PC 1/13/20
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Charlene Tim <charlene.tim@edcgov.us>

23 pages

Fwd: Objection to CEDHSP, General Plan Amendment, Zoning Change

John Richard <jr.gotwake@gmail.com> Thu, Dec 12, 2019 at 2:14 PM
To: charlene.tim@edcgov.us, planning@edcgov.us

Char,

Nice meeting you today and thank you for explaining how the Legistar is organized.

Please see the attached letter to the planning commissioners. My intention is that my letter be entered into the public comments.

Thank you,

John Richard

---------- Forwarded message ---------
From: **John Richard** <jr.gotwake@gmail.com>
Date: Thu, Dec 5, 2019 at 5:06 PM
Subject: Objection to CEDHSP, General Plan Amendment, Zoning Change
To: <jvegna@edcgov.us>, <gary.miller@edcgov.us>, <jeff.hansen@edcgov.us>, <james.williams@edcgov.us>

Commissioners:

Please see the attached letter detailing my objections and concerns with respect to the Central El Dorado Hills Specific Plan, associated general plan Amendment and zoning change.

I have provided the letter in PDF format. If you have problems clicking through on any of the reference links, please let me know and I will provide them under separate cover.

Respectfully,

John Richard
2086 Lamego Way
El Dorado Hills, CA 95762
916-221-2586

CEDHSP Objections - John Richard x.pdf
455K

December 5, 2019

John Vegna
Gary Miller
Jeff Hansen
James Williams
El Dorado County Planning Commission
2850 Fairlane Court
Placerville, CA 95667

RE: OBJECTION TO PROPOSED CENTRAL EL DORADO HILLS SPECIFIC PLAN, RELATED GENERAL PLAN AMENDMENT AND ZONING CHANGE

Planning Commissioners:

I am writing to express my objection to the Central El Dorado Hills Specific Plan, the related General Plan Amendments, and the associated zoning change and entitlement requests as outlined in the County of El Dorado Planning and Building Department Planning Commission Staff Report prepared by Mel Pabalinas for the agenda of November 14, 2019 (the Staff Report) (collectively, the CEDHSP).

My objection focuses on three primary issues. First, the community of El Dorado Hills has expressed overwhelming opposition to the CEDHSP. Second, notwithstanding statements in the Staff Report Attachment 6 "General Plan Consistency Analysis" and Attachment 8 "CEQA Findings of Fact and Statement of Overriding Consideration," the CEDHSP is clearly inconsistent with material parts of the 2004 El Dorado County General Plan (the General Plan). Third, the project applicant and El Dorado County has not presented an accurate description of the project, its benefits or its objectives.

1. **The community of El Dorado Hills overwhelmingly opposes the plan**

   As you are aware, the CEDHSP is subject to discretionary approval by the Board of Supervisors because it does not conform to existing General Plan land use designations nor related zoning. The project applicant has no right or reasonable expectation that it can develop the CEDHSP area as proposed nor did it buy the former executive golf course property with any promise, implied or otherwise, that it could develop it as anything other than "open space-recreational facility."

   Given the discretionary nature of the proposal, the El Dorado County Planning Commission and Board of Supervisors have an obligation to review the plan in the context of what is in the interests of the existing members of the community. Givin the

community's overwhelming opposition to the proposed plan, approval of the CEDHSP is tantamount to telling the community of El Dorado Hills that it does not know what is in its own best interest.

As a recap, there is significant evidence that the members of the community oppose the CEDHSP:

a. November 2013 through January 2014, the Community Economic Development Advisory Committee for El Dorado Hills (CEDAC) conducted a community survey (performed by AIM Consulting). The study concluded, among other things, that the community "truly values its open spaces." 61% of respondents "felt there needed to be more public open space areas." 92.2% of respondents agreed that "keeping the look and feel of El Dorado Hills mixture of urban-like and rural-like charm" is important.
https://www.eldoradohillscsd.org/images/community_interest/golf/eldoradohills_comm_survey_report.pdf

b. CSD Measure E: On the November 3, 2015, ballot, more than 91% of El Dorado Hills voters voted against rezoning the Executive Golf Course to allow residential and commercial development on the property.
https://ballotpedia.org/El_Dorado_Hills_Community_Services_District_Former_Golf_Course_Rezoning_Advisory_Question,_Measure_E_(November_2015)

c. All but one public comment at the November 13 APAC meeting and the November 14 planning commission meeting opposed to the CEDHSP.

Though the community has expressed significant opposition to the CEDHSP, the applicant has made no meaningful effort to revise the project to address concerns. In fact, at both the November 13 APAC meeting and the November 14 planning commission meeting, Kirk Bone, the developer's representative, started his presentation by stating "not much has changed" from the plan as it was originally proposed and that was overwhelmingly rejected by the community.

The developer has consistently resisted making changes to address community concerns. Most recently, at the planning commission meeting on November 14, 2019, when asked about increasing the currently proposed park size to address community concern about loss of open space, Kirk Bone said if the applicant has to make any more concessions, it might need to "walk away" from the project. This is a surprising reply given (a) one of the biggest issues for the community is loss of usable and visible open space, and (b) the developer has not made meaningful concessions to address community concerns.

2. The CEDHSP is inconsistent with many provisions of the General Plan

As you are aware, in order for a specific plan to be approved, it must be consistent with the General Plan (CA Gov 65450-65457). Staff Report and Attachment 6 conclude the CEDHSP is consistent with the General Plan. Attachment 8 contains multiple assertions that the CEDHSP meets General Plan policies. Kirk Bone, applicant's representative, states that the CEDHSP is consistent with 121 of 121 General Plan policies..

However, notwithstanding Staff Report conclusions and statements by Mr. Bone, any reasonable interpretation of the General Plan will conclude that the CEDHSP is inconsistent with respect to many Goals and Policies. While the CEDHSP is partially consistent, CA Gov 65454 states "No specific plan may be adopted or amended unless the proposed plan or amendment is consistent with the general plan." The code makes no provision for partially consistent specific plans, or even mostly consistent.

I have attached a detailed list of inconsistencies. As I compared the CEDHSP to the general plan, I found it troubling that the Staff Report does not address areas of inconsistency and, instead, only looks at portions of the general plan where the CEDHSP can be found consistent. Even with such selective analysis, a number of the findings of consistency are dubious. Several obvious and critical inconsistencies were completely ignored by the Staff Report:

a. <u>GOAL 2.1: LAND USE. "Protection and conservation of existing communities and rural centers...."</u>

There is no reference in the Staff Report, including attachments, to this opening clause of Goal 2.1. I suspect because the County and staff knows that the CEDHSP is inconsistent on this point. Rather, the Staff Report skips this clause and finds consistency in the third clause that reads "curtailment of urban/suburban sprawl." Even then, it ignores that urban and suburban sprawl is similarly contained under existing land use designations.

We know the CEDHSP is inconsistent with the opening clause of Goal 2.1 because *the community says it is* as evidenced by the Measure E advisory vote, the CEDAC survey, and almost all public comments. In no way does the CEDHSP protect and conserve the existing community of El Dorado Hills. In fact, it does the opposite by changing open space to high-density residential at the gateway to the community. If the County believes the CEDHSP protects and conserves existing communities, as required, then the staff should identify specifically how it does so..

b. GOAL 2.3: NATURAL LANDSCAPE FEATURES. "Maintain the characteristic natural landscape features unique to each area of the County."

As with the opening clause of Goal 2.1, the Staff Report does not address Goal 2.3. Again, the community has voiced, unequivocally, that the rezoning of the Executive Golf course and subsequent development with high density housing is inconsistent with Goal 2.3. It is obvious: the CEDHSP eliminates 160 acres of highly visible open space and its natural landscape features. Project applicant claims this is offset by open space in Village D-1 Lots C and D, both largely inaccessible to the public, hidden from view, and subject to asbestos related health risks..

c. GOAL 2.4: EXISTING COMMUNITY IDENTITY. "Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents

Again, the Staff Report does not address Goal 2.4, skipping an important point of inconsistency. And, again, likely because the County knows the CEDHSP is inconsistent with this goal. The community has stated clearly that rezoning the executive golf course detracts from the quality of life and community pride of El Dorado Hills residents.

Sadly, the list of General Plan goals and policies left unaddressed by the Staff Report is extensive and reveals many inconsistencies. For details, please see the attached "CEDHSP General Plan Inconsistencies.".

3. The project applicant and El Dorado County have not presented an accurate description of the project, its history, or its objectives

a. Biased interpretation of alternatives to the CEDHSP

The applicant and the Staff Report assert that meaningful benefits accrue to the community by way of the CEDHSP. These arguments consistently ignore the fact that many of these benefits will accrue under the existing General Plan land-use designations and associated zoning without the approval of the CEDHSP. Further, they ignore virtually all costs associated with securing CEDHSP benefits, including damage to the character of El Dorado Hills, the loss of desirable open space, and elimination of future recreational opportunities

b. The analysis of the CEDHSP in Staff Report Attachment 8, "CEQA Findings" uses circular logic to advocate for the CEDHSP

As required by law, Staff Report Attachment 8, *CEQA Findings of Fact and Statement of Overriding Considerations*, analyzes alternatives to the CEDHSP. One alternative it looks at is "No project."

However, the Staff Report is defective because it analyses the this alternative based on whether it meets the *CEDHSP objectives*. It is circular logic: the CEDHSP objectives did not exist until the CEDHSP was proposed and the objectives were written explicitly to incorporate the features of the CEDHSP. Thus, alternative land uses, particularly the "No Project" option, will never meet the CEDHSP objectives.

Just as a law's existence cannot be the source of its own constitutional validity, we cannot look to the outcomes of a development to automatically rule out the beneficial outcomes of all alternative land uses. We know the outcomes will be different with different uses. The Staff Report uses such circular logic to dismiss more desirable alternatives.

Specifically, the Staff Report rejects what it calls the "Measure E Alternative" (no project) because it does not

- create a new transportation system
- improve bicycle connectivity
- maintain characteristics of natural landscape on Village D-1 lots C and D
- minimize impacts on oak woodlands on Village D-1 lots C and D

The first two conclusions are easily rebutted if one does not assume they are requirements simply because they are part of the CEDHSP proposal. For example, is it truly a requirement that a new transportation system is created in El Dorado Hills? Is it a requirement that bicycle connectivity be improved? Does this mean all new development in El Dorado Hills must meet these objectives. Bicycle paths are nice benefits, but they are certainly not reasons to reject alternatives and should not be the litmus test for new housing.

The second two conclusions are simply misleading. While it is true that the CEDHSP will maintain the characteristics and natural landscape of Village D-1 Lots C and D, it is equally true that it will also destroy the characteristics and natural landscape of the former executive golf course and the Pedregal Area, including damage to oak woodlands. To be clear, oak woodlands will be impacted under the CEDHSP, particularly in Pedregal. Staff has not quantified

any net benefit in this regard between the "no project" alternative and the CEDHSP.

Further, while the CEDHSP will minimize impacts on oak woodlands on Village D-1 lots C and D to a greater degree than the "Measure E Alternative," the fact is that the County has already implemented extensive oak woodland protections on the currently entitled lots.

c. CEDHSP community benefits, as detailed in presentations by the applicant and staff before the planning commission and as memorialized in the Draft Development Agreement, are exaggerated and do not take into account negative impacts associated with the CEDHSP

A key argument made in the CEDHSP and the Staff Report (including Attachment 8, "CEQA Findings") is that the CEDHSP provides significant community benefits. However, many of the benefits detailed will accrue to the community under the existing land use designations and, therefore, are not benefits unique to the CEDHSP. To the extent there are unique benefits associated with the CEDHSP, they come at the cost of less usable and visible open space, elimination of future recreational facilities, and significantly increased traffic. El Dorado Hills residents have clearly stated they do not wish to pay this price.

Finally, many of the benefits asserted by the developer and County are, in reality, findings of no-negative-impact with respect to certain aspects of the CEDHSP. Including "non-negatives" or mitigated impacts as community benefits underlines the scarcity of actual benefits afforded by the CEDHSP.

The key benefits, as outlined by Kirk Bone (APAC November 13 and before the Planning Commision November 14), each followed by a brief analysis:

- ***Fiscally neutral with respect to county general fund, EDH CSD, and EDH Fire***
  Analysis: This is true of the existing land use designation and is not a *community benefit of the CEDHSP*. A finding that the CEDHSP does not negatively impact the community fiscally does not mean that it provides a community benefit. In fact, for a general plan amendment and zoning change, this is the absolute *minimum* bar that should be met before the county considers such a proposal.

- ***Community Benefit Fee--$4,500,000***
  Analysis: As pointed out in public comments, this is more accurately described as a "General Plan Amendment Inducement Fee." Even Kirk

Bone, at the November 13 APAC meeting, said he has never seen a "Community Benefit Fee" before and that it is simply an extraction by the County to allow the project to move forward..

There are multiple problems with this fee. First, there is no guarantee that any of this fee will directly benefit El Dorado Hills, the community that is absorbing the negative impacts of the CEDHSP. Thus, it doesn't accomplish the implied meaning of its awkward title. Rather, this fee appears to help El Dorado County with general fiscal issues and, in so doing, induces the Board of Supervisors to vote in favor of a plan that would otherwise be rejected. As such, it is clearly a "pay to play" fee meant to sidestep the desires of the community.

Second, notwithstanding that the County has included the Community Benefit Fee in the "County-Wide Benefit" section of the Development Agreement, the Development Agreement states the "County may use these funds for any purpose benefiting the *community* (emphasis added)." Does this mean the County intends to use the funds to benefit the community, El Dorado Hills, absorbing the impact of the CEDHSP? If so, then the language in the agreement should clearly define the future use of this fee.

However, I suspect the County does not intend to spend the money in the local community and, rather, staff purposefully obfuscates its actual intentions. As with the misleading use of the word "infill" throughout the CEDHSP and Staff Report, the Staff Report, Development Agreement, and CEDHSP often use words in ways that are misleading and obfuscating.

Third, the community of El Dorado Hills, as demonstrated by its overwhelming opposition to the CEDHSP, does not find this fee to be an adequate benefit to compensate for the loss of usable open space and increased traffic imposed by the CEDHSP.

- ***Property Transfer Fee--$100,000 annually***
  Analysis: Much of this fee can accrue under existing land use designations when Pedregal and Village D1 are developed and is not a benefit unique to the CEDHSP.

  Further, the Development Agreement states this fee shall be used for the "ongoing maintenance of the properties referred to in paragraph 3.2.4 if they exist and, if not, shall be used by the County for other services that

benefit the community." However, the only properties mentioned in paragraph 3.2.4 (Community Benefit Fee) are by way of aspirational language provided by the developer that it desires the County use the Community Benefit Fee in conjunction with the CSD to provide facilities in El Dorado Hills. Given that the County determines if the Community Benefit Fee is used to provide such facilities and has, thus far, refused to guarantee such facilities, it is a stretch to think the wording in this paragraph means the County intends to use the Property Transfer Fee to benefit the local community. Again, it appears staff is intentionally misleading the public.

- ***Public Park Maintenance Funding--TBD via future LLAD or similar***
  Analysis: Two problems: First, Kirk Bone (APAC meeting November 13) stated the funds generated will be used to offset the "fair share" of the impact of the new residents in the CEDHSP. Thus, there is no benefit other than to offset impacts of the proposed plan. As with the claim of fiscal neutrality, mitigating impacts of the CEDHSP is not a community benefit. Rather, it is the minimum bar for consideration of the proposal.

  Second, impact-offset funds of this sort can be generated under existing General Plan land use designations. As with traffic mitigation, it is not a benefit unique to the CEDHSP.

- ***No cost dedication/restriction of open space and construction of publicly-accessible trails***
  Analysis: This is clearly not a material benefit for several reasons. First, the proposed trails and open space come at the cost of building medium and high density housing on existing open space land that is prized by the community. The proposed CEDHSP open space land (Village D1, Lots C and D) is less visible and less accessible than the open space that will be removed (the executive golf course land). In summary, this benefit comes at such a high cost such that it is, in reality, an obvious net negative.

  Second, nothwithstanding that the trails within the housing developments of the CEDHSP will be open to the public, there is no doubt that the primary use and benefit of such trails will be for residents of the CEDHSP. If you doubt this, I suggest you look at trail use in Serrano. You will find that trails within Serrano are used primarily by residents of that Serrano.

  Third, changing the zoning of the former executive golf course, currently "open space - recreational facility," to high density residential permanently removes the option to use that land for future trails or recreational facilities. Community residents value the vista and access afforded by the

former golf course. In addition, the Western Slope of El Dorado County and Folsom are adding residents at a rapid pace. Given nearby population growth, it is likely that recreational facilities will be economically viable in the near future even if unviable today. It is short sighted to adopt a General Plan amendment and zoning change that precludes such use. It is clearly not a benefit to the community nor the County.

- ***No Cost Dedication of Country Club Drive Right of Way--$3,000,000***
  Analysis: At the November 13 APAC meeting, Kirk Bone described the value of this dedication as having a "little bit of a cost saving effect on the TIM fees going forward." In other words, the benefit is relatively small and can be achieved without the CEDHSP through existing TIM fee structure or TIM fees collected from the development of the Pedregal area under existing land use designations.

  This benefit can also be secured through fees associated with a separate specific plan for the Pedregal area or entitlements associated with the development of EDH 52 (potential Costco site) and does not require amending the general plan nor changing zoning.

  Further, the acquisition of this right of way is already in the current TIM Fee Program budget. Thus, the frontage road between Silva Valley Parkway and El Dorado Hills Boulevard can move forward without the CEDHSP.

- ***Advanced Construction of Country Club Drive--$8,500,000***
  Analysis: Portraying this as a benefit of the CEDHSP is misleading for three specific reasons.

  First, the asserted benefit is one of timing only. Per the Development Agreement (3.2.2 and 3.3), the developer will receive "TIM fee credits and/or reimbursements for the construction of Country Club Drive." Thus, the construction is paid by the County through TIM fee reimbursements or other funds.

  The Draft Development Agreement says the Developer will not start construction until it "...has received the credits provided hereunder, applicable dollar for dollar, in an aggregate amount equal to the total construction cost of Phase 1 of Country Club Drive....inclusive of all permitting costs incurred by Developer in connection with processing and securing permits necessary to construction [sic] of Phase 2."

Second, the benefit of timing is questionable given that Phase 1 of Country Club Drive (the segment commencing at El Dorado Hills Boulevard and terminating at the eastern project boundary) is a necessity of the project. Its purpose, per the Draft Development Agreement, is to provide access to housing proposed in the CEDHSP. By itself, it contributes nothing of benefit to the community or County and must be built in order for the developer to build homes on the former golf course.

With respect to Phase 2 (the segment between the eastern edge of the CEDHSP and Silva Valley Parkway), the benefit of timing is marginal. In the absence of traffic associated with the development of the CEDHSP, there is no immediate need for the frontage road.

Third, the County has an opportunity to collect TIM fees from the development of EDH 52 that can be used toward the construction of Country Club Drive.

- ***Dedication to CSD of Parkland in Excess of Obligation***

Analysis: There are multiple problems.

First, and most serious, the proposed 15 acre park is adjacent to the freeway. Not only is this unpleasant for users of the proposed park, but the location poses significant health risks recognized by the State of California. The California Environmental Protection Agency and California Air Resources Board (CEPA/CARB) recommends that new sensitive land uses, specifically including playgrounds, be sited at least 500 feet from freeways because the populations that use such facilities are vulnerable to cancer and other negative health effects as the result of exposure to high levels of air pollution and particulate matter. The most vulnerable populations identified by CEPA/CARB are the exact ones expected to spend time in the proposed park: children, pregnant women, and the elderly.

CEPA/CARB recommends "doing everything possible to avoid locating sensitive receptors [vulnerable users] within the highest risk zones." CARB found non-cancer health risks were elevated within 1000 feet of freeways and strongest within 300 feet. Further, its report noted that particulate pollution fell by 70% at 500 feet from freeways, greatly reducing health risks.

The non-cancer health effects are serious: reduced lung function in

children was associated with traffic density (Brunekreef, 1997); increased asthma hospitalizations associated with living within 650 feet of heavy traffic (Lin, 2000); increased asthma symptoms within 300 feet of freeways (Venn, 2001); asthma and bronchitis symptoms associated with proximity to high traffic in an area with otherwise good air quality (Kim, 2004); increased medical visits in children living within 550 feet of heavy traffic (English, 1999). CEPA/CARB found that "in these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects."

CEPA/CARB also states "...proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure." It found relative cancer risk is 300-1700 near freeways--that means 300-1700 times more likely and should give you pause.

The risk is so great that state law prohibits the siting of schools within 500 feet of freeways with 100,000 vehicles per day. Caltrans counts peak month traffic on Highway 50 at Latrobe Road at 106,000 vehicles per day (average), well within CEPA/CARB's advisory parameters.

Interestingly, CEPA/CARB suggests that the County's general plan and related zoning be used to avoid pollution related health risks identified above. Nevertheless, these exact health risks are an inherent part of the CEDHSP proposal. Without the CEDHSP, the general plan works as intended and minimizes health risks to vulnerable members of the community.

Please see the following for reference:
https://ww3.arb.ca.gov/ch/handbook.pdf
http://lapublichealth.org/eh/docs/AQinFreeways.pdf

Second, the community has expressed, by way of the Advisory Vote, that it does not wish to trade current and future recreational opportunities afforded by the former executive golf course for a freeway-adjacent park. This holds true even if the former golf course land remains vacant.

Third, the CSD has multiple park locations, including Bass Lake Road, that can be built out to serve the same or similar function as the park proposed in the CEDHSP. Further, no evidence has been presented that the community or CSD feels there is a shortage of park space available for development of community facilities.

Fourth, new parks are not a benefit unique to the CEDHSP. As part of the entitlement process for the Pedregal area, the County can require the installation of a parks and/or mitigation fees to improve other park locations including off Bass Lake Road. While Pedregal area parks will be smaller than the park proposed in the CEDHSP, any such parks will likely be healthier, safer, and more desirable.

- ***Contribution toward environmental review and permitting of Highway 50 pedestrian overcrossing--$500,000***
  Analysis: this is a benefit of relatively little value. While it's nice to think El Dorado Hills will become a pedestrian and bike-centric community that will make extensive use of a pedestrian overcrossing, it is unlikely to happen given it is primarily a bedroom community and will become more-so if the CEDHSP is approved. There are no studies or supporting that an overcrossing will be widely used or that it is of any benefit greater than the existing undercrossing. Further, $500,000 is a small fraction of the ultimate cost of such a facility. The money needed for construction would likely be better spent on community facilities that would see greater use.

- ***Net Positive TIM fee contributions without triggering new roadway improvements--$20,000,000***
  Analysis: TIM fee contributions are meant to mitigate costs of managing increased traffic associated with new development. Because traffic impacts accumulate with each new development, the fact that no new roadway improves are triggered by the CEDHSP does not mean there are no real costs or impacts of its development. (For example, the next project approved might be a 100 unit subdivision that will trigger $20,000,000 of roadway improvement, but that trigger might be tripped only because the CEDHSP was developed first. In other words, the bulk of the cost will be incurred because of the CEDHSP even if it is not the trigger event.) To imply that CEDHSP TIM fees are in excess of actual impact is disingenuous at best.

  In addition, $20,000,000 net appears to be an exaggeration as $8,500,000 of the TIM fees will be reimbursed to the developer for construction of Country Club Drive.

  In any event, it is clear that the CEDHSP, if developed as proposed, will have a significant impact on traffic in the long run. The $20,000,000 contribution to TIM fees is not a net benefit--it is merely mitigation of

impacts. Labeling mitigation measures as "benefits" underscores the lack of benefits associated with the CEDHSP.

- ***SACOG SCS Consistency***
  Analysis: It's getting redundant, but this is not a unique benefit provided by the CEDHSP. SACOG SCS consistency can be met with the existing land use designations.

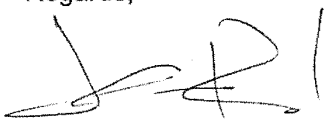
- ***Affordable Housing Contribution--$368,000***
  Analysis: This is a nice but small benefit. $368,000 might be the cost of one low income housing unit. It is also a benefit that is likely met by development under existing land use designations.

- ***Contribution to County's Intelligent Transportation System Project*--$368,000**
  Analysis: The Draft Development Agreement identifies this as "The proposed Project's...fair share of the El Dorado Hills Intelligent Transportation System (ITS project)." Again, describing a mitigation or "fair share" payment as a benefit is disingenuous. In any event this payment represents only 7% of the cost of the ITS project--a relatively small proportion. In addition, fair share payments can be secured under the existing land use designations.

I regret that this letter must be as long as it is. The unfortunate fact is that the County has done a poor job analyzing this project and there are many legitimate concerns and questions left unaddressed by staff. At the end of the day, the CEDHSP is opposed by the community, is patently inconsistent with the El Dorado County General Plan even after proposed amendments, and has been misrepresented to voters and community members.

Please take these concerns seriously.

Regards,



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CEDHSP INCONSISTENT WITH GENERAL PLAN

The El Dorado County General Plan (GP) forth specific goals, objectives, and policies to guide the growth and development of El Dorado County (the County).

Residents in the community base decisions on the GP documents and changing them sometimes means meaningful promises are broken. In the case of the Central El Dorado Hills Specific Plan associated GP Amendment (CEDHSP), the proposed land use is radically different than the land use as outlined in the GP. Approval of the CEDHSP by the Board of Supervisors would be a clear violation of the trust of the residents of the community..

Planning Commission Staff (Staff) prepared a Staff Report including Attachment 6-General Plan Consistency Analysis because, by law, a specific plan cannot be approved unless it is consistent with the GP. In its review, Staff uses a very narrow view of the General Plan and also ignores goals, objectives, and policies where the CEDHSP is inconsistent with the GP. Additionally, Staff does not address the actual goals in the GP and instead addresses subparagraph "objectives" and "policies" for each goal. Further, staff avoids comparing the status quo (e.g. existing entitlements at Village D-1 Lots C and D and existing open space in the CEDHSP area) to the proposed CEDHSP.

1. **Inconsistent with General Plan Land Use Element**

    a. **GOAL 2.1: LAND USE. "Protection and conservation of existing communities and rural centers; creation of new sustainable communities; curtailment of urban/suburban sprawl; location and intensity of future development consistent with the availability of adequate infrastructure; and mixed and balanced uses that promote use of alternate transportation systems."**

        i. Staff does not address the clause "Protection and conservation of existing communities". Given the definitive rejection of the CEDHSP by advisory vote, it is impossible to argue that CEDHSP protects and preserves the existing community when the existing community opposes it by an overwhelming margin.

    b. **Objective 2.1.1: COMMUNITY REGIONS. [deleted for brevity]...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.**

i. Staff does not address this objective. It is very similar in wording to Goal 2.4 below. Given that Objective 2.1.1 is similar to Goal 2.4, we can take it to mean that this is something seriously contemplated by the GP even though it was ignored by Staff.

It is impossible to find consistency between the GP Objective 2.1.1 and CEDHSP We know conclusively that CEDHSP is inconsistent on this point because the advisory vote showed greater than 90% of community residents are opposed to the plan. To claim CEDHSP is consistent with Objective 2.1.1 is the equivalent of saying community residents do not know what they value in their community and that they should have no say in its composition.

Specifically, based on the advisory vote, CEDHSP clearly does not preserve the character of existing urban centers nor does it contribute to the quality of life of County residents. Residents of the affected community value the area's existing character, which includes open space as it currently exists and as it is currently designated under the General Plan.

c. **Policy 2.2.5.3: "The County shall evaluate future rezoning: (1) To be based on the General Plan's general direction as to minimum parcel size or maximum allowable density; and (2) To assess whether changes in conditions that would support a higher density or intensity zoning district. The specific criteria to be considered include, but are not limited to, the following:"**

i. **4. Distance to and capacity of the serving elementary and high school**

1. Notwithstanding anything said in the DEIR, Oak Ridge is beyond capacity currently. Will the kids of CEDHSP be shipped to a distant high school? If so, then approval of the CEDHSP without addressing this issue would ignore the "Distance" consideration.

ii. **15. Existing land use patterns**

1. Existing land use in the CEDHSP area is primarily open space. Using such land for medium and high density residential is clearly not consistent with the existing land use.

Staff ineffectively addresses this issue by claiming consistency based on nearby residential use. This is a very narrow interpretation of the General Plan. A broader, and more accurate, interpretation is that the CEDHSP area existing land use is *Open*

Space. If this were not the case, then we would expect item 15 to read "Land use patterns in adjacent areas" rather than "Existing land use patterns."

d. **GOAL 2.3: NATURAL LANDSCAPE FEATURES. Maintain the characteristic natural landscape features unique to each area of the County**

   i. As with Goal 2.1, Staff ignores this and, instead, focuses tightly on a specific objective. CEDHSP clearly does not maintain the "characteristic natural landscape features" as required by Goal 2.3. The plan exchanges open space, natural grasslands, and undeveloped slopes for medium and high density residential.

   Staff erroneously claims consistency because the CEDHSP complies with Policy 2.3.2.1 "Disturbance of slopes thirty (30) percent or greater shall be discouraged to minimize the visual impacts of grading and vegetation removal." However, this policy is only a subset of Goal 2.3.

e. **GOAL 2.4: EXISTING COMMUNITY IDENTITY. Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents.**

   i. Staff does not address Goal 2.4 nor any of its delineated policies, likely because it is impossible to find consistency between GP Land Use Goal 2.4 and the CEDHSP We know conclusively that CEDHSP is inconsistent with Goal 2.4 because the advisory vote showed greater than 90% of community residence are opposed to the plan. To claim CEDHSP is consistent is the equivalent of saying community residents do not know what they value in their community and that they should have no say in its composition.

   Specifically, based on the advisory vote, CEDHSP clearly does not contribute to the quality of life of County residents. Residents of the affected community value their community's existing character, which includes open space as it currently exists and as it is currently designated under the General Plan.

f. **Policy 2.4.1.2 The County shall develop community design guidelines in concert with members of each community which will detail specific qualities and features unique to the community as Planning staff and funds are available. Each plan shall contain design guidelines to be used in project site review of all discretionary project permits. Such plans may be**

developed for Rural Centers to the extent possible. The guidelines shall include, but not be limited to, the following criteria (...list follows):

i. As with other goals, objectives and policies, staff does not address Policy 2.4.1.2. If the County is abiding by this policy, then it will abide by the Advisory Vote, in which greater than 90% of community members voted against approval of the CEDHSP. If the Board of Supervisors approves the CEDHSP, then it is clearly not developing guidelines in concert with members of the community. CEDHSP is a discretionary project and the County is bound by Policy 2.4.1.2.

g. **Policy 2.4.1.5 The County shall implement a program to promote infill development in existing communities.**
   i. **B. Project sites may not be more than five acres in size and must demonstrate substatially [sic] development has occurred on 2 or more sides of the site**
      1. Staff ignores this policy. Per the CEDHSP document, the proposed specific plan is an infill program, but it is greater than five acres and it does not demonstrate substantial development has occurred on two or more sides of the site. In most of the Serrano Westside Planning Area portion of the CEDHP, development has occurred on only one side of the site.

         From the CEDHSP document:

         "The Plan Area is mostly undeveloped, however it is an infill property surrounded by existing residential and non-residential development" (2-6)

         "The following opportunities illustrate the positive aspects of the Plan Area and the Project Proponent has integrated these criteria into the land use concept: ...Utilize undeveloped or underdeveloped infill locations..." (2-38)

         "...the Plan Area is considered an infill location..." (7-1)

   ii. **D. Approval of a project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

      1. The DEIR recognizes significant effects relating to air quality. Its conclusions with respect to traffic effects are suspect.

h. **GOAL 2.5: COMMUNITY IDENTITY. Carefully planned communities incorporating visual elements which enhance and maintain the rural character and promote a sense of community.**

   i. Again, Staff does not address the specific goal of the GP and the CEDHSP is obviously not consistent with Goal 2.5. Besides being part of the GP, development at Village D-1 Lots C and D will have minimal impact on the visual elements which enhance and maintain the rural character and promote a sense of community. However, development on the currently designated open space in the CEDHSP area will have a major impact that will negatively affect the rural character and sense of community of El Dorado Hills.

i. **GOAL 2.6: CORRIDOR VIEWSHEDS. Protection and improvement of scenic values along designated scenic road corridors**

   i. I cannot find a definitive list of "scenic road corridors." It appears the compilation of this list is a work in progress. Staff does not address this issue and it might be that this section of El Dorado Hills Boulevard is protected.

2. **Inconsistent with the General Plan Housing Element**

   a. **Policy HO-1.9 The County shall work with local community, neighborhood, and special interest groups in order to integrate affordable workforce housing into a community and to minimize opposition to increasing housing densities.**

      i. Staff does not address this policy. The Advisory Vote, with greater than 90% of the community opposed to the CEDHSP, shows the CEDHSP is inconsistent with the General Plan Housing Element HO-1.9. If the County has tried to minimize opposition to increasing housing densities and failed, that does not mean it has met the obligations of HO-1.9. Rather, it means it has been unable or unwilling to minimize the opposition and, therefore, the CEDHSP is inconsistent with the GP. In any event, it does not appear the County has tried to meet this obligation.

   b. **Policy HO-1.25 The County shall encourage programs that will result in improved levels of service on existing roadways and allow for focused reductions in the Traffic Impact Mitigation (TIM) Fee. Such programs may include, but not be limited to, analyzing the traffic benefits of mixed-use development.**

i. Staff does not address this policy. Clearly, CEDHSP does not encourage improved levels of service on existing roadways. Given it is a discretionary project and requires a zone change, the burden is on the County to show it is part of a program that meets Policy HO-1.25, otherwise it is inconsistent with the GP.

Additionally, Policy HO-1.25 can be met through the land use designations of the existing GP. CEDHSP adds nothing to further this policy.

c. **Policy HO-4.1 The development of affordable housing for seniors, including congregate care facilities, shall be encouraged.**
   i. Staff asserts consistency with the GP. In a narrow interpretation of the GP, this is technically true. However, Policy HO-4.1 does not say "Reduce open space in order to develop affordable housing for seniors..." In a holistic read of the GP, the CEDHSP is clearly inconsistent.

   Additionally, affordable housing for seniors is an optional part of the CEDHSP, making it inconsistent with the GP. It will only be developed by the project sponsor if it is the most profitable option during the CEDHSP is build out.

3. **Inconsistent with General Plan Conservation and Open Space Element**

   a. **GOAL 7.6 OPEN SPACE CONSERVATION. Conserve open space land for the continuation of the County's rural character, commercial agriculture, forestry and other productive uses, the enjoyment of scenic beauty and recreation, the protection of natural resources, for the protection from natural hazards, and for wildlife habitat.**
      i. Staff does not address Goal 7.6 directly. The CEDHSP clearly reduces open space, so it cannot be consistent with the goal of conserving open space. Staff asserts the CEDHSP is consistent with the GP by focusing narrowing on Objective 7.6.1.1.E.

   b. **Objective 7.6.1 IMPORTANCE OF OPEN SPACE. Consideration of open space as an important factor in the County's quality of life.**
      i. **Policy 7.6.1.1 The General Plan land use map shall include an Open Space land use designation. The purpose of this designation is to implement the goals and objectives of the Land Use and the Conservation and Open Space Elements by serving one or more of the purposes stated below. In addition, the designations on the land use map for Rural Residential and Natural Resource areas are also**

intended to implement said goals and objectives. Primary purposes of open space include:

1. **C. Maintaining areas of importance for outdoor recreation including areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes including those providing access to lake shores, beaches and rivers and streams; and areas which serve as links between major recreation and open space reservations including utility easements, banks of rivers and streams, trails and scenic highway corridors.**

2. **E. Providing for open spaces to create buffers which may be landscaped to minimize the adverse impact of one land use on another**

   .

   a. By ignoring all but subsection E, Staff asserts the CEDHSP is consistent with Goal 7.6. But a comprehensive read of Goal 7.6 including Objective 7.6.1.1.C shows the CEDHSP is, in fact, inconsistent with the GP. It is true the CEDHSP provides for open space, but it does so by reducing total open space in the specific plan area. It is incorrect to consider trading more open space for less open space as consistent with Goal 7.6 and its subsections.

      Further, we cannot foresee future uses of what is currently zoned open space with respect to recreation. Part of the CEDHSP area was once a golf course and, according to the CEDHSP document, constructed as a marketing tool to attract homebuyers to El Dorado Hills (2.5.1). Those homebuyers, the current members of the community, should not lose the possibility of again seeing that land used for recreational purposes. In the future, the open space in the CEDHSP area might be used for another form of recreation vital to the community. Goal 7.6 states, specifically, that the County is to "maintain areas of importance for outdoor recreation including...areas particularly suited for park and recreation purposes..." This clause alone makes the CEDHSP inconsistent with the GP.

4. **Inconsistent with the Parks and Recreation Element**

    a. **GOAL 9.1: PARK ACQUISITION AND DEVELOPMENT. The County shall assume primary responsibility for the acquisition and development of regional parks and assist in the acquisition and development of neighborhood and community parks to serve County residents and visitors**

        i. **Policy 9.1.1.1 [Lists a table showing guidelines for acres of park per 1,000 population]**

            1. Staff asserts consistency with the GP because the CEDHSP provides for a 15 acre Community Park and a 1-acre neighborhood park with the *potential* for an 11-acre park site at the limited commercial / civic designated site.

               There are multiple problems. First, these parks come at the cost of a significant amount of open space and the option for the creation of future recreational opportunities on the existing open space land. The community, by way of the Advisory Vote, clearly stated it would rather maintain existing open space than have the parks promised by the CEDHSP. If the CEDHSP is to be consistent with Goal 9.1, then it must be consistent with the wants and desires of the community.

               Second, Staff has not demonstrated a need for these additional parks by showing a deficiency in park space as outlined in Policy 9.1.1.1.

               Third, the parks proposed by the project sponsor are inadequate: One is tucked against the freeway in a noisy and undesirable location where many might not want their children breathing particulate matter from highway 50. The other is on the corner of El Dorado Hills Boulevard and Serrano Parkway. This is a busy intersection--most parents will not be comfortable with their children playing or tossing a ball in this location.

               Fifth, Staff brings up a *potential* park as part of its consistency argument. If it's not *required* in the CEDHSP, then it should not be considered as consistent with the GP.

               Sixth, Staff did not address the park space that would otherwise be required on development of Village D-1 Lots C and D. The CEDHSP most likely sees a loss of park land on those lots.

Again, Staff has taken a very narrow view of the intent of the GP to declare consistency. A comprehensive read shows the CEDHSP is largely inconsistent with Objective 9.1.1

PC 1/13/20
#1

Charlene Tim <charlene.tim@edcgov.us>
2 pages

Fwd: EDH "old" golf course

Rommel Pabalinas <rommel.pabalinas@edcgov.us> Sun, Dec 15, 2019 at 7:14 AM
To: Charlene Tim <charlene.tim@edcgov.us>
Cc: Debra Ercolini <debra.ercolini@edcgov.us>

fyi

---------- Forwarded message ---------
From: **Gordon Allred** <buckallred@gmail.com>
Date: Sat, Dec 14, 2019 at 2:21 PM
Subject: EDH "old" golf course
To: <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>, <jvegna@edcgov.us>, <gary.miller@edcgov.us>, <jeff.hansen@edcgov.us>, <james.williams@edcgov.us>, <rommel.pabalinas@edcgov.us>

There are many reasons to vote NO REZONE on this issue. The most critical is to maintain the quality of life for current and future residents of El Dorado Hills.

The Planning Commission and the Board of Supervisors will vote on this question so please consider the future needs of El Dorado Hills to preserve Open Space that is useable, workable and accessible for our community. This site was and is zoned "Open Space Recreation" and should remain so in the heart of El Dorado Hills.

We understand that El Dorado County Planning Staff have worked with the applicant to try to update and mitigate any old issues or new requirements. We also gather from the hearing on 11/14/19 that CSD has tried to be part of that process but was more or less shut out when their requests for an Increase in Park Quality and Size was rejected by applicant. We feel that the site should remain as currently zoned.

A few highlights for your consideration in voting NO REZONE:

1. A Measure E Advisory Vote resulted in 91% of El Dorado Hills voters returning a NO REZONE of the EDH Executive Golf Course on November 3, 2015.

2. There will be an increase in traffic flow at all points caused by this rezone that would impact not only the center of El Dorado Hills but the entire community.

3. Having a park next to Highway 50 seems too little and too close to increased emissions.

4. There are already 9400 homes in the planning stages in EDH so why concentrate more congestion in the heart of EDH.

5. Water use will increase by the build out of all current projects and an added burden will be leveled if another 1,000 units are approved. EDH has experienced water rationing in recent years so any projections can only be guesses and it seems sensible to leave this site as zoned. Once all current projects are built the reality would be known as to the EID capabilities to provide service to all of EDH customers.

6. Perhaps applicant should build out the 135 units in Serrano that are already approved rather than exchange it as that Serrano area is not accessible or easily utilized by the community for quality open space.

7. This site as zoned "Open Space Recreational" is the most suitable location for any of these uses: a multi-recreational facility, a community center, play parks, regional park, sports fields, trails, tennis courts and quality open space.

This project is not fiscally viable without imposing additional taxes. Why would you approve a project that would destroy the beauty of El Dorado Hills and that is projected to lose money at inception and into perpetuity? There are other alternatives that would be much more appealing to the residents and to El Dorado Hills proper and could provide revenue to the County that it needs.

We kindly request that you please vote NO REZONE on this in order to preserve the original protections for this prime quality "Open Space Recreation" in the heart of El Dorado Hills for our current and future generations of El Dorado County Kids.

Thank You For Your Thoughtful Consideration,

Gordon Allred, EDH resident
916 792 7906

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Rommel (Mel) Pabalinas, Planning Manager (Current Planning Division)
El Dorado County Planning and Building Department
2850 Fairlane Court, Building C
Placerville, CA 95667
Main Line 530-621-5355
Direct line 530-621-5363
Fax 530-642-0508

PC 1/13/20
#1

Charlene Tim <charlene.tim@edcgov.us>

2 pages

Fwd: reasons for opposition to EDH rezone of old golf course parcel

Rommel Pabalinas <rommel.pabalinas@edcgov.us> Sun, Dec 15, 2019 at 8:24 AM
To: Charlene Tim <charlene.tim@edcgov.us>, Debra Ercolini <debra.ercolini@edcgov.us>

fyi

---------- Forwarded message ---------
From: **Cathy Devito** <catdevitosf@yahoo.com>
Date: Wed, Dec 11, 2019 at 4:34 PM
Subject: reasons for opposition to EDH rezone of old golf course parcel
To: 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>, jvegna@edcgov.us <jvegna@edcgov.us>, gary.miller@edcgov.us <gary.miller@edcgov.us>, jeff.hansen@edcgov.us <jeff.hansen@edcgov.us>, james.williams@edcgov.us <james.williams@edcgov.us>, rommel.pabalinas@edcgov.us <rommel.pabalinas@edcgov.us>
Cc: tjwhitejd@gmail.com <tjwhitejd@gmail.com>, jdavey@daveygroup.net <jdavey@daveygroup.net>, jjrazzpub@sbcglobal.net <jjrazzpub@sbcglobal.net>, bwashburn@murphyaustin.com <bwashburn@murphyaustin.com>

Hello,
First, thanks to each of you for your public service. I'm a homeowner and resident of EDH; the following reasons are why I request you vote NO REZONE of the EDH Executive Golf Course parcel.

1. The rezone is not necessary for the County to meet its RHNA and/or other local or State measures.
Housing is already under development to meet the criteria. Although there may be changes to requirements in the future, there is plenty of land still available in the County to meet the needs.

2. The developer purchased the parcel in question knowing how it was zoned, and both County and developer have heard public opinion on the subject since 2015. Overwhelmingly opposed by people who live and pay taxes in this community.
A rezone would be mostly an economic benefit for the developer.
Any "trade" for other land on the ridge seems a ploy by the applicant/developer, as that land is more costly to develop and represents far fewer homes for developer profit. Why does the community need to suffer the loss of prime open and usable space to make it easier for a developer to profit? A smaller park next to a freeway is distasteful and not a fair trade. Why trade at all.

3. An expectation that retirees from the Bay Area will continue to purchase in EDH in droves may be optimistic. Most, like myself, were attracted to the semi-rural setting and relative lack of traffic congestion. It is quickly changing and there are many other options for this demographic, both in and out of State, whether downsizing or looking for a better quality of life for self / family.

Prop 90 is over in EDC, traffic congestion has appreciably increased, and now the 'new normal' of power outages during increasingly frightening fire seasons. This is not an attraction to EDH.

What does make EDH attractive and unique is the open space, recreation for families, adults, safer roads, less traffic. Let's please not exchange open, usable community space for more dwellings, since we already have over 9000 in the planning stages.

4. Where are the new jobs (close by) to support those with mortgages? Local mass transit options to get to Sacramento or other urban areas that do provide such employment? We continue to lose larger employers, most recently Blue Cross, replaced by more housing and retail/big box/warehouse. At some point that seems unsustainable.

Our schools are overcrowded already, and we are threatened with water rationing and power outages. Where is the mitigation v. contribution to these problems?

Let's work with what we have approved already, to see what additional impacts we - the taxpayers - will need to bear with respect to water, congestion and infrastructure maintenance and development.

5. The completion of residential and commercial projects underway at our Hwy 50 intersections will significantly increase traffic in all directions, including all the way to Green Valley and Francisco. Silva Valley and EDH Blvd cannot be widened sufficiently.

Already there is significant congestion during non-commute hours at Green Valley/Silva and EDH/Francisco intersections. These routes are used as cut-throughs by personal and commercial vehicles. In just 3 years I've seen a huge increase on local roads during both commute and non-commute hours. The location of the potential rezone area is smack in the middle of this and would add significantly.

I am not against development in general, but we also have a more fiscally responsible way to develop the open land without adding a tax burden to our residents, destroying the very reason why they chose to live here.

Thank you for your time and consideration.

Cathy Devito
3311 Bellingham Place
El Dorado Hills, CA 95762
415-652-2902

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Rommel (Mel) Pabalinas, Planning Manager (Current Planning Division)
El Dorado County Planning and Building Department
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PC 1/13/20
#1

Charlene Tim <charlene.tim@edcgov.us>
2 pages

Fwd: Opposition to Golf Course Re-Zone

Planning Department <planning@edcgov.us> Wed, Dec 18, 2019 at 9:22 AM
To: Charlene Tim <charlene.tim@edcgov.us>

---------- Forwarded message ---------
From: **The BOSONE** <bosone@edcgov.us>
Date: Wed, Dec 18, 2019 at 9:12 AM
Subject: Fwd: Opposition to Golf Course Re-Zone
To: Planning Department <planning@edcgov.us>

Kind Regards,

Cindy Munt
Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
CLICK HERE to follow Supervisor Hidahl on Facebook
CLICK HERE to visit Supervisor Hidahl's web page

---------- Forwarded message ---------
From: **Wendy Jones** <wendyandalexjones@gmail.com>
Date: Tue, Dec 17, 2019 at 6:38 PM
Subject: Opposition to Golf Course Re-Zone
To: <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>

I oppose the re-zone of the golf course for these reasons:
1. The proposed residences are located on the old golf course which had been promised and zoned for recreational use and open space. The current owners knew when they purchased it what it was zoned for.
2. In 2015, 91% of the residents voted to keep this land as originally zoned, recreational use and open space.
3. Up to 2000 additional cars will be competing for space on already clogged roads, namely, El Dorado Hills Blvd. There are already back ups heading toward Green Valley and there is no mitigation planned in this direction.
4. From what I have read there is no benefit to the community, only the developers. The project's own fiscal analysis foresees the county will lose money every year, to the toon of several millions of dollars.
5. The plan's technical studies are out-of-date, in many cases about ten years old. EDH has grown substantially and is very different than it was when the technical studies were undertaken. A new study should be re-done by an independent third party and should reflect actual current traffic impacts, etc.
6. The "Serrano Westside" and the "Pedregal" projects have been thrown together even though the only commonality is that they both create traffic problems for EDH Blvd and they have the same

owner. They should be considered separately because they have different settings, hydrology, wildlife, type of development, previous zoning and land use, etc. The tables in the plan do not segregate impacts by location creating (intentional?) confusion. The Corps of Engineers divided the project into two parts, with separate permits for each. The county should do the same.

7. The plan has many omissions:

-What happens to the large portion of Pedregal bordered by Gillette on the north, existing Ridgeview residences on the west, a housing development on the south, and apartments on the east? This is a large blank space, suggesting some hidden intent on the part of the developer.

-What about the wetlands impacts? The wetlands delineation and other biological studies were done during the drought years. The rain of the last few years has dramatically changed the impact areas, with springs and seeps on the Pedregal side and more wildlife. There are more impacts now than when the project proponent conveyed their documents. The Corp of Engineers should be given current facts about these wetlands before issuing a permit since so much has changed and more will be destroyed.

8. There seems to be some unexplained density transfers between the ridge about the archery range (an alleged asbestos site) and either/or the golf course or Pedregal sites that are not normal in development and not likely legal. Promises made by Parker in the 1980's for protecting cultural and biological resources were not kept, with many design changes. The County and Corp of Engineers should review compliance measures undertaken by Parker for Serrano before issuing any new permits to this developer. Noncompliance by Parker in the past may be a harbinger of things to come if this developer is allowed to continue with these projects.

9. Where is the input from the High School District on the impact the influx of new families will have on already overcrowded Oak Ridge High School? The district may receive tax dollars from the project but there is no plan in place to deal with the overcrowding. This must be addressed before any new housing projects are allowed in the Oak Ridge High School attendance area.

This project undermines the nature and rural feel of our community. Bay Area folks are coming here looking to escape what this developer is creating. I have lived in Camino and El Dorado Hills most of my life. I don't want to live in Bay Area Lite. Please keep the golf course zoned recreational/open space.

Thank you.

Wendy Jones

PC 1/13/20
#1

Charlene Tim <charlene.tim@edcgov.us>

2 pages

Fwd: Central El Dorado Hills Specific Plan

Planning Department <planning@edcgov.us> Thu, Dec 19, 2019 at 3:18 PM
To: Charlene Tim <charlene.tim@edcgov.us>

---------- Forwarded message ---------
From: **Kevin Ratliff** <kevratliff@gmail.com>
Date: Thu, Dec 19, 2019 at 1:58 PM
Subject: Central El Dorado Hills Specific Plan
To: <planning@edcgov.us>
Cc: EDC COB <edc.cob@edcgov.us>, The BOSONE <bosone@edcgov.us>, vegna@sbcglobal.net <vegna@sbcglobal.net>

I am writing to express my opposition to the rezone of the old golf course. First and foremost, the General Plan is a critical document that creates a long-term vision for the County and provides guidance for growth. Far too often we see a deep-pocketed developer come in and propose an amendment to the plan which is almost *always* granted even in cases similar to this where the local residents express deep opposition. This needs to STOP. The General Plan needs to be followed, which in the case of this project means a complete rejection of the plan until a proposal is received that honors the General Plan and the open space recreation zoning.

There are many reasons to vote NO REZONE on this issue. The most critical is to maintain the quality of life for current and future residents of El Dorado Hills.

The Planning Commission and the Board of Supervisors will vote on this question so please consider the future needs of El Dorado Hills to preserve Open Space that is useable, workable and accessible for our community. This site was and is zoned "Open Space Recreation" and should remain so in the heart of El Dorado Hills.

We understand that El Dorado County Planning Staff have worked with the applicant to try to update and mitigate any old issues or new requirements. We also gather from the hearing on 11/14/19 that CSD has tried to be part of that process but was more or less shut out when their requests for an Increase in Park Quality and Size was rejected by applicant. We feel that the site should remain as currently zoned.

A few highlights for your consideration in voting NO REZONE:

1. A Measure E Advisory Vote resulted in 91% of El Dorado Hills voters returning a NO REZONE of the EDH Executive Golf Course on November 3, 2015.

2. There will be an increase in traffic flow at all points caused by this rezone that would impact not only the center of El Dorado Hills but the entire community.

3. Having a park next to Highway 50 seems too little and too close to increased emissions.

4. There are already 9400 homes in the planning stages in EDH so why concentrate more congestion in the heart of EDH.

5. Water use will increase by the build out of all current projects and an added burden will be leveled if another 1,000 units are approved. EDH has experienced water rationing in recent years so any projections can only be guesses and it seems sensible to leave this site as zoned. Once all current projects are built the reality would be known as to the EID capabilities to provide service to all of EDH customers.

6. Perhaps applicant should build out the 135 units in Serrano that are already approved rather than exchange it as that Serrano area is not accessible or easily utilized by the community for quality open space.

7. This site as zoned "Open Space Recreational" is the most suitable location for any of these uses: a multi-recreational facility, a community center, play parks, regional park, sports fields, trails, tennis courts and quality open space.

This project is not fiscally viable without imposing additional taxes. Why would you approve a project that would destroy the beauty of El Dorado Hills and that is projected to lose money at inception and into perpetuity? There are other alternatives that would be much more appealing to the residents and to El Dorado Hills proper and could provide revenue to the County that it needs.

We kindly request that you please vote NO REZONE on this in order to preserve the original protections for this prime quality "Open Space Recreation" in the heart of El Dorado Hills for our current and future generations of El Dorado County Kids.

Thank You For Your Thoughtful Consideration,

Kevin Ratliff
Rosado Drive
El Dorado Hills

PC 1/13/20.
#1

Charlene Tim <charlene.tim@edcgov.us>
3 pages

Fwd: No Rezone

Rommel Pabalinas <rommel.pabalinas@edcgov.us> Fri, Dec 20, 2019 at 6:54 AM
To: Charlene Tim <charlene.tim@edcgov.us>, Debra Ercolini <debra.ercolini@edcgov.us>

fyi

---------- Forwarded message ---------
From: **Dianne Gross** <diannegross@gmail.com>
Date: Thu, Dec 19, 2019 at 10:20 PM
Subject: No Rezone
To: <bosone@edcgov.us>, <bosthree@edcgov.us>, <bostwo@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>, <jvegna@edcgov.us>, <gary.miller@edcgov.us>, <jeff.hansen@edcgov.us>, <james.williams@edcgov.us>, <rommel.pabalinas@edcgov.us>

Planning Commission,

Please the attached for my views on rezoning the golf course.

Respectfully,
Dianne Gross

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Rommel (Mel) Pabalinas, Planning Manager (Current Planning Division)
El Dorado County Planning and Building Department
2850 Fairlane Court, Building C
Placerville, CA 95667
Main Line 530-621-5355
Direct line 530-621-5363
Fax 530-642-0508

Letter-to-Hidahl-and-others-1-.docx
15K

December 19,2019
Email: bosone@edcgov.us
bostwo@edcgov.us
bosthree@edcgov.us
bosfour@edcgov.us
bosfive@edcgov.us
jvegna@edcgov.us
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jeff.hansen@edcgov.us
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There are many reasons to vote NO REZONE on this issue. The most critical is to maintain the quality of life for current and future residents of El Dorado Hills.

The Planning Commission and the Board of Supervisors will vote on this question so please consider the future needs of El Dorado Hills to preserve Open Space that is useable, workable and accessible for our community. This site was and is zoned "Open Space Recreation" and should remain so in the heart of El Dorado Hills.

We understand that El Dorado County Planning Staff have worked with the applicant to try to update and mitigate any old issues or new requirements. We also gather from the hearing on 11/14/19 that CSD has tried to be part of that process but was more or less shut out when their requests for an Increase in Park Quality and Size was rejected by applicant. We feel that the site should remain as currently zoned.

A few highlights for your consideration in voting NO REZONE:

1. A Measure E Advisory Vote resulted in 91% of El Dorado Hills voters returning a NO REZONE of the EDH Executive Golf Course on November 3, 2015.

2. There will be an increase in traffic flow at all points caused by this rezone that would impact not only the center of El Dorado Hills but the entire community.

3. Having a park next to Highway 50 seems too little and too close to increased emissions.

4. There are already 9400 homes in the planning stages in EDH so why concentrate more congestion in the heart of EDH.

5. Water use will increase by the build out of all current projects and an added burden will be leveled if another 1,000 units are approved. EDH has experienced water rationing in recent years so any projections can only be guesses and it seems sensible to leave this site as zoned. Once all current projects are built the reality would be known as to the EID capabilities to provide service to all of EDH customers.

6. Perhaps applicant should build out the 135 units in Serrano that are already approved rather than exchange it as that Serrano area is not accessible or easily utilized by the community for quality open space.

7. This site as zoned "Open Space Recreational" is the most suitable location for any of these

uses: a multi-recreational facility, a community center, play parks, regional park, sports fields, trails, tennis courts and quality open space.

This project is not fiscally viable without imposing additional taxes. Why would you approve a project that would destroy the beauty of El Dorado Hills and that is projected to lose money at inception and into perpetuity? There are other alternatives that would be much more appealing to the residents and to El Dorado Hills proper and could provide revenue to the County that it needs.

We kindly request that you please vote NO REZONE on this in order to preserve the original protections for this prime quality "Open Space Recreation" in the heart of El Dorado Hills for our current and future generations of El Dorado County Kids.

Thank You For Your Thoughtful Consideration,

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