

El Dorado Hills Area Planning Advisory Committee



APAC 2024 Officers

John Davey, Chair jdavey@daveygroup.net
John Raslear, Vice Chair jjrazzpub@sbcglobal.net
Timothy White, Vice Chair tjwhitejd@gmail.com
Brooke Washburn, Vice Chair washburn_bew@yahoo.com
Robert Williams, Secretary bobw1800@gmail.com

1021 Harvard Way, El Dorado Hills, CA 95762
<https://edhapac.org>

August 26, 2024

TO: Bianca Dinkler, Senior Planner
County of El Dorado Planning Department
2850 Fairlane Court, Building C
Placerville, Ca 95667
Email: generationsatgreenvalley@edcgov

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) in conjunction with input from El Dorado Hills residents working on our Generations at Green Valley review subcommittee, would like to submit the following comments, observations, and questions in response to the Generations at Green Valley DRAFT Environmental Impact Report public review period.

El Dorado Hills Area Planning Advisory Committee Comments

GENERATIONS AT GREEN VALLEY: Draft EIR

(General Plan Amendment GPA22-0001, Rezone Z22-0001, Tentative Subdivision Map TM22-0001, Development Agreement DA24-0001)

EDH APAC Officers' Comments

Initial Study

The Importance of a Comprehensive Initial Study

The Initial Study is a foundational document in the CEQA process, serving as a preliminary assessment of potential environmental impacts. It is crucial for identifying significant effects, informing the subsequent Notice of Proposed Action (NOP), and ensuring a transparent and accountable environmental review.

Concerns Regarding the Waiving of the Initial Study

EDH APAC is deeply concerned about the County's decision to waive the Initial Study for the Generations at Green Valley project. This decision raises questions about the thoroughness of the environmental review process and the potential for overlooking significant impacts. The Notice of Preparation, and following Scoping Meeting, not being informed by the Initial Study, was presented to the public on March 12, 2024. The resultant DRAFT Environmental Impact Report was made available to the public on June 27, 2024, a mere 107 days later - to many, it seems that the Scoping Meeting, without being informed by an Initial Study, was essentially completed without significant input from the Scoping Meeting - suggesting that the DEIR was largely completed prior to the Scoping Meeting.

Potential Reliance on Previous Project

Many community members and the EDH APAC believe that the County may be relying on the Initial Study from the previously rejected Dixon Ranch residential project on the same property to justify waiving the Initial Study requirement for this new development.

Key Differences Between Dixon Ranch and Generations at Green Valley

While the Generations at Green Valley project proposes a less dense development than the Dixon Ranch project, relying on an outdated Initial Study from the previous project is not appropriate. The Initial Study should have been completed based solely on the specific details and proposed scope of the Generations at Green Valley project.

Conclusion

A comprehensive Initial Study is essential for ensuring that the potential environmental impacts of the Generations at Green Valley project are fully evaluated. By waiving this crucial step, the County risks overlooking significant issues that could have far-reaching consequences for the community and the environment.

Utilities

Utility And Roadway Rebuild Costs And Funding

In our response to the project NOP and Scoping meeting we provided the following concerns:

Analyze the significant planning, construction and inspection costs of all utilities. Analyze and identify all alignments both new, combined capacity and rebuilt for the extensive network of utilities throughout the northern portion of El Dorado Hills required for this proposed subdivision project. Include all costs including but not limited to notifications, relocation of existing infrastructure, loss to disruption of businesses, all materials, design, permits, traffic control, relocations and conflict with existing

infrastructure. Clearly analyze the funding breakdown of all aspects of the extensive utilities that will be needed to convert 280 acres of agriculture land to highest intensity densities of residential that is needed to support this subdivision Generations at Green Valley. Include in analysis of costs all utilities: water, sewer, power, fiber, and any arial both onsite and offsite for new utility alignments, utility capacity upgrades, and replacement of existing utilities.

Analyze the extensive cost to streets and roads for repaving of utility trenches through existing neighborhoods, surface streets and arterial roads such as Green Valley Road and Silva Valley Road. The requirement of lane line to lane line asphalt paving over a trench is industry standard when trenching through existing streets and roads. Analyze the cost of full lane width asphalt paving in and throughout neighborhoods, surface streets and arterial roads. Analyze and identify who will pay the cost of trenching then full width paving 1600 linear feet of gravity wastewater in Highland Hills, Highland View and Sterlingshire. Analyze and identify the funding structure of the cost of 8,500 linear feet of force main from Highland Hills to Saint Andrews Lift Station. Including but not limited to administration costs, inspection costs, all materials, material testing, traffic striping costs, costs of traffic control, added costs of night work, added costs to access materials at night, cost of notifications, costs of loss to disruption of businesses. Analyze and identity costs of County Inspection for oversight and protection of existing infrastructure and include file retention, material testing and documentation costs.

EDH APAC recognizes that Utility providers, via their entitled easements, typically repair via a patching over smaller trenches, without fully restoring roadways to their pre-existing condition - however, it seems unfair to injure existing residents (via both public and private road), only to benefit a new development project.

EDH APAC recommends that the project Development Agreement between the applicant and the County, and conditions of approval, should establish funding adequate to resurface any roadway that requires significant ditching and pavement repair.

Utility Infrastructure And Alignments

Our NOP and Scoping Meeting comments reflected:

Analyze and clearly identify all utility alignments to a scale and detail sufficient to give clear indication of impacts and conflicts to decision makers and the public.

EDH APAC recommends that the full scope of infrastructure construction costs and impacts be communicated to immediate residents in the area. Advanced notification of lane and road closures should be provided for all phases of the construction.

Contracts With Private Roads And Subdivisions

Similarly, construction activities impacting private roads need to be communicated to the private owners of these roads by utilities and private construction companies.

Water, Sewer, Ground Water

Offsite Water Improvements

EDH APAC has concerns and questions regarding the following elements in the DEIR

- **Pipeline Construction:** The proposed 10-inch pipeline from the project's southern border to Greenview Drive and the connection to the 8-inch water distribution pipeline within Lima Way.
- **Capacity Analysis:** Assessing the capacity of existing water lines to support the proposed development.
- **Construction Impacts:** Identifying potential conflicts and impacts during construction, including temporary permits and easements.
- **Wastewater Improvements:** Analyzing the existing 8-inch gravity wastewater line and proposing necessary upgrades, including upsizing and force main construction.
- **Funding Structure:** Determining how the costs of these improvements will be allocated among the county, ratepayers, and other entities.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Pipeline Alignment and Capacity:**
 - What is the optimal alignment for the 10-inch pipeline?
 - What is the expected capacity of the pipeline, and how does it compare to the projected demand from the development?
 - Are there any existing utilities or infrastructure that could conflict with the pipeline alignment?
2. **Construction Impacts:**
 - What are the potential temporary construction permits required for the project?
 - How will construction impacts be mitigated, such as traffic management and noise control?
 - What easements will be needed for the pipeline and other infrastructure?
3. **Wastewater System Analysis:**
 - What is the current capacity of the 8-inch gravity wastewater line, and is it sufficient to handle the additional load from the development?

- What is the condition of the existing pipe, and does it require any repairs or replacements?
 - What is the optimal location for the force main, and what are the associated costs?
4. **Funding Structure:**
- How will the costs of the offsite water improvements be divided among the county, ratepayers, and other entities?
 - What is the expected impact on water rates for existing residents and businesses?
 - Are there any opportunities for cost-sharing or collaboration with other projects?

Data and Analysis Requirements

To conduct a thorough analysis, the following data will be needed:

- **Existing utility infrastructure:** Maps, plans, and records of water, sewer, and other utilities in the area.
- **Development plans:** Site plans, zoning information, and projected water and sewer demands.
- **Hydrological data:** Rainfall, runoff rates, and groundwater levels.
- **Soil conditions:** Information on soil types, permeability, and corrosivity.
- **Traffic data:** Existing traffic volumes and projected future traffic patterns.

By addressing these questions and collecting the necessary data, we can develop a comprehensive analysis of the offsite water improvements proposed for the project. This analysis will help decision-makers understand the potential benefits and costs of the project and make informed decisions.

Ground Water

EDH APAC has the following concerns and questions:

- **Groundwater Drawdown:** Assessing the potential for groundwater levels to decline due to the proposed development.
- **Recharge and Intrusion:** Analyzing the impact of the development on groundwater recharge and the potential for saltwater intrusion.
- **Water Rights:** Examining the water rights of surrounding properties and how they may be affected.
- **Water Source:** Determining whether the proposed development will use septic systems, recycled water, or wells, and analyzing the potential impacts of each option.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Groundwater Drawdown:**
 - What is the current groundwater level in the area, and what is the expected rate of groundwater recharge?
 - How much groundwater is expected to be used by the proposed development?
 - What is the potential for groundwater drawdown to impact existing wells in the area?
2. **Recharge and Intrusion:**
 - How will the development affect groundwater recharge rates?
 - Is there a risk of saltwater intrusion into the groundwater aquifer?
 - What measures can be taken to mitigate the potential for groundwater recharge and intrusion problems?
3. **Water Rights:**
 - What are the water rights of surrounding properties, and how do they relate to the proposed development?
 - Are there any conflicts or potential conflicts over water rights?
 - How will the development's water use be managed to avoid conflicts with existing water rights?
4. **Water Source:**
 - What are the advantages and disadvantages of using septic systems, recycled water, or wells for the proposed development?
 - What are the potential impacts of each option on groundwater quality and quantity?
 - How will the water source be managed to ensure adequate supply and minimize environmental impacts?

Data and Analysis Requirements

To conduct a thorough analysis, the following data will be needed:

- **Groundwater data:** Historical groundwater levels, aquifer characteristics, and recharge rates.
- **Hydrogeological maps:** Maps showing the location of groundwater aquifers and their boundaries.
- **Water rights information:** Records of water rights for surrounding properties.
- **Soil data:** Information on soil types, permeability, and infiltration rates.
- **Land use data:** Information on current and future land uses in the area.

By exploring these questions, and collecting the corresponding data, we can develop a comprehensive analysis of the groundwater impacts of the proposed development. This analysis will help decision-makers calculate and consider the potential risks and benefits of the project.

Drainage

- **Watershed Analysis:** Assessing the impact of the proposed development on the overall watershed.
- **Onsite and Offsite Drainage:** Analyzing the drainage patterns both within the project site and in surrounding areas.
- **Water Retention Ponds:** Evaluating the need for and use of water retention ponds, particularly for fire suppression.
- **Drainage Contributions:** Determining the impact of the development on drainage in neighboring areas, such as Highland View, Green Springs Ranch, Serrano Western Sierra Way, and Green Valley Road.
- **Drainage Infrastructure:** Identifying the necessary drainage infrastructure both on and off the site.
- **Hydraulic Study:** Conducting a comprehensive hydraulic study to evaluate drainage flows and potential impacts.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Watershed Analysis:**
 - What is the current condition of the watershed, and how will the development affect its hydrology?
 - Are there any sensitive areas or resources within the watershed that could be impacted by increased runoff?
 - How will the development's stormwater runoff be managed to minimize impacts on the watershed?
2. **Onsite and Offsite Drainage:**
 - What are the existing drainage patterns in the area, and how will they be affected by the development?
 - What are the potential impacts of increased runoff on surrounding properties and infrastructure?
 - How will the development's drainage system be designed to prevent flooding and erosion?
3. **Water Retention Ponds:**
 - Are water retention ponds necessary to manage stormwater runoff from the development?
 - What will be the primary use of the ponds, and will they be designed to serve multiple purposes (e.g., fire suppression, recreation)?
 - How will the ponds be maintained and operated to ensure their effectiveness?
4. **Drainage Contributions:**
 - How will the development's drainage contribute to the overall runoff in surrounding areas, such as Highland View, Green Springs Ranch, Serrano Western Sierra Way, and Green Valley Road?

- What are the potential impacts of increased runoff on these areas, and how can they be mitigated?
5. **Drainage Infrastructure:**
- What type of drainage infrastructure will be needed to manage stormwater runoff from the development, such as storm drains, swales, and detention ponds?
 - How will the drainage infrastructure be designed to accommodate seasonal flows and prevent flooding?
6. **Hydraulic Study:**
- What is the scope and methodology of the required hydraulic study?
 - What data will be used to inform the study, such as rainfall data, topography, and land use information?
 - What are the expected outcomes of the study, and how will they be used to inform the development's design?

Water Supply

EDH APAC member Alastair Dunn has completed extensive analysis on water availability for existing and proposed projects in the El Dorado Hills area. Mr. Dunn has a long and distinguished career in land acquisition, development, and the entitlement and approvals process both in El Dorado County and many other areas of the United States.

EDH APAC has submitted this analysis recently on two other Specific Plan Proposals - EDH APAC has provided a page with Mr. Dunn's analysis on the EDH APAC [El Dorado Hills Water Supply Analysis June 2024](#)

[\[https://edhapac.org/el-dorado-hills-area-water-supply-analysis-june-2024/\]](https://edhapac.org/el-dorado-hills-area-water-supply-analysis-june-2024/)

we also include the links to these supporting documents of Mr. Dunn's analysis in this list:

- [EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1](#)
- [EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2](#)
- [EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3](#)
- [EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4](#)
- [EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5](#)
- [EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6](#)
- [EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7](#)

- [EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8](#)
- [EDH WATER – Supply + Demand Analysis -W-FULL](#)
- [EDH Projects in EDH – CamPk plan areas – may 2024-A-Dunn1](#)

In the conclusion of Mr. Dunn’s analysis in his [Water Supply Demand Analysis](#), Mr Dunn concludes:

As the arrows show, no matter what, EDH has an imbalance of supply of water, particularly in the short run.

Summary: Given the positive assertion that: “there is sufficient water to cover the needs of all EDH projects” in general and Marble Valley and Lime Rock Valley Specific Plans, in particular; is false.

The main issue of imbalance in the medium and long term is the certainty of water rights secured and capital improvements achieved, see Exhibit 8 & 9. It is beyond my ability and the scope of this work to make any qualifying remark other than to say; I am uncomfortable with the caveats made in memoranda qualifying EID’s water availability. To quote one such caveat: “The water rights applications and environmental analysis are still pending”. And “the District cannot predict whether or when El Dorado Water Reliability Project may be approved”. Indeed, the Tully and Young Memo of May 30, 2014, is rife with caveats that are now eleven ten years old.*

*Admittedly EID has achieved much since 2013, however, to continue to write long memos and outdated references in the Marble Valley DEIR underscoring the water rights secured and capital improvements made, it is imperative that a fresh review of these critical issues are factually reviewed, and if possible, qualified by a concrete probability (0 to 100) to give a measure of credibility as to water supply. (*MSR & SOI Update (final) Public -Service & Infrastructure, page 7-16 in reference to 2010 EDWPA’s environmental report).*

SECTION FIVE: CONCLUSION *At this point, all I can say to EDH-APAC is: “Houston we have a problem”. The fact that 17000 units are planned in the EDH area should give anyone reason to question the availability of water for such a fantastic, planned demand. Throughout the DEIRs from 2013 to 2024 there are **statements concluding that there “is” sufficient water to attend Marble Valley’s (and Lime Rock’s) potable water needs. I suggest that this is not true for the EDU area.***

Traffic

Traffic Circulation

- **Study Intersections:** Identifying all intersections that will be affected by the development.
- **Traffic Circulation:** Assessing the impact of the development on traffic flow throughout El Dorado Hills.
- **Traffic Safety Improvements:** Identifying and analyzing potential traffic safety improvements, including changes to signal timing and other measures.
- **Phasing:** Considering the potential for phasing traffic improvements over time.
- **Transparency:** Ensuring that the analysis is transparent and based on factual data, rather than assumptions.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Study Intersections:**
 - What are the key intersections that will be affected by the development, and what is the current traffic volume at these intersections?
 - How will the development's traffic generate additional traffic at these intersections?
 - What are the potential impacts of increased traffic on congestion and safety at these intersections?
2. **Traffic Circulation:**
 - How will the development's traffic impact traffic flow on major roads in El Dorado Hills, such as Green Valley, Silva Valley, Bass Lake, El Dorado Hills Blvd, Francisco, and internal subdivision roads?
 - What are the potential impacts of increased traffic on congestion, safety, and air quality?
 - How will the development's traffic be managed to minimize impacts on existing traffic patterns?
3. **Traffic Safety Improvements:**
 - What are the potential traffic safety improvements that could be implemented to mitigate the impacts of the development's traffic?
 - How will these improvements be evaluated for their effectiveness and cost-benefit?
 - Will the improvements be implemented in phases, or will they be implemented all at once?
4. **Transparency:**

- How will the analysis ensure that all potential impacts of the development's traffic are identified and evaluated?
- Will the analysis be based on factual data and avoid relying on assumptions?
- How will the analysis be communicated to the public and decision-makers?

Traffic Infrastructure

- **Identification of Intersections:** Identifying all intersections that will be affected by the development.
- **Cost Estimates and Timeframes:** Providing cost estimates and timeframes for necessary infrastructure improvements.
- **Realistic Mitigations:** Ensuring that proposed mitigations are practical and effective in addressing traffic impacts.
- **Comprehensive Analysis:** Conducting a comprehensive analysis of traffic infrastructure needs, including road improvements, signal timing, and lane striping.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Identification of Intersections:**
 - What are the key intersections that will be affected by the development, and what is the current traffic volume at these intersections?
 - How will the development's traffic generate additional traffic at these intersections?
 - What are the potential impacts of increased traffic on congestion and safety at these intersections?
2. **Cost Estimates and Timeframes:**
 - What are the estimated costs of necessary infrastructure improvements, such as signal timing, lane striping, and road widening?
 - What is the expected timeframe for implementing these improvements?
 - How will the costs of these improvements be allocated among the developer, the county, and other entities?
3. **Realistic Mitigations:**
 - Are the proposed mitigation measures for traffic impacts realistic and effective?
 - Are there any potential constraints or limitations that could prevent the implementation of these measures?
 - How will the effectiveness of the mitigation measures be monitored and evaluated?
4. **Comprehensive Analysis:**
 - Has the analysis considered all necessary traffic infrastructure improvements, including road widening, signal timing, lane striping, and traffic control measures?
 - Are the proposed improvements consistent with the design standards and guidelines for the area?

- How will the effectiveness of the traffic infrastructure improvements be evaluated?

5. El Dorado County Capital Improvement Program

- What projects exist in the County's Capital Improvement Program that the project might impact?
- What are the possible projects in the Capital Improvement Program that might become reimbursable to the project applicants?

Traffic Geometrics

- **Site Distance:** Ensuring adequate site distance for safe turning and merging.
- **Safety:** Assessing the safety of proposed road improvements.
- **Vehicle Capacity:** Evaluating the capacity of roads to handle the projected traffic volume.
- **Speed Zones:** Determining appropriate speed zones for different road segments.
- **Curve Data:** Analyzing the geometry of curves to ensure safety and adequate sight distances.
- **Acceleration/Deceleration:** Assessing the need for acceleration and deceleration lanes at intersections.
- **Right-of-Way Availability:** Determining the availability of right-of-way for road improvements.
- **Signing, Repaving, Striping, Drainage:** Identifying necessary improvements to signing, repaving, striping, and drainage.
- **Impacts to Adjacent Uses:** Assessing the potential impacts of road improvements on adjacent properties and uses.
- **Access:** Analyzing the need for new access points or modifications to existing access points.
- **Signal Study:** Conducting a signal study to evaluate the need for new signals or modifications to existing signals.
- **Intersection Widening:** Assessing the need for intersection widening to improve traffic flow.
- **Relocation of Existing Infrastructure:** Identifying any necessary relocation of existing infrastructure, such as utilities or structures.
- **Costs:** Estimating the costs of proposed traffic geometric improvements.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Site Distance:**
 - Are the proposed site distances for intersections and driveways adequate to ensure safe turning and merging?
 - What modifications may be necessary to improve site distances?
2. **Safety:**

- How will the proposed road improvements affect traffic safety, such as reducing accident rates?
 - What safety features will be incorporated into the design of the improvements?
3. **Vehicle Capacity:**
- Will the proposed road improvements be sufficient to accommodate the projected traffic volume? (LOS metrics of the El Dorado County Adopted General Plan Transportation Element for both the El Dorado Hills Community Region, and Rural Region)
 - What are the potential impacts of increased traffic on congestion and safety?
4. **Speed Zones:**
- What are the appropriate speed zones for different road segments?
 - How will speed zones be enforced and monitored?
5. **Curve Data:**
- Are the proposed curves adequately designed to ensure safety and adequate sight distances?
 - What modifications may be necessary to improve curve geometry?
6. **Acceleration/Deceleration:**
- Are acceleration and deceleration lanes needed at intersections to improve traffic flow and safety?
 - What is the estimated cost of providing these lanes?
7. **Right-of-Way Availability:**
- Is sufficient right-of-way available for the proposed road improvements?
 - If not, what are the potential alternatives for acquiring additional right-of-way?
8. **Signing, Repaving, Striping, Drainage:**
- What improvements are necessary to signing, repaving, striping, and drainage?
 - What is the estimated cost of these improvements?
9. **Impacts to Adjacent Uses:**
- What are the potential impacts of road improvements on adjacent properties and uses, such as noise, vibration, and loss of access?
 - How will these impacts be mitigated?
10. **Access:**
- Are new access points needed, or can existing access points be modified to accommodate the development?
 - What are the potential impacts of new access points on traffic flow and safety?
11. **Signal Study:**
- Is a signal study necessary to evaluate the need for new signals or modifications to existing signals?
 - What are the expected outcomes of the signal study?
12. **Intersection Widening:**
- Are intersection widening improvements necessary to improve traffic flow and safety?
 - What is the estimated cost of intersection widening?
13. **Relocation of Existing Infrastructure:**

- Are there any existing utilities or structures that will need to be relocated to accommodate road improvements?
 - What is the estimated cost of relocating these infrastructure elements?
14. **Costs:**
- What is the estimated total cost of the proposed traffic geometric improvements?
 - How will the costs be allocated among the developer, the county, and other entities?

EDH APAC members have significant concerns about the traffic geometrics at both of the proposed project access roads on Green Valley Road, as well as the impacts of project mitigations and capacity improvements on numerous Green Valley Road intersections of both public roads and private driveways.

Right of Way

- **Identification of Required Right-of-Way:** Determining the specific right-of-way needs for proposed traffic improvements.
- **Acquisition Methods:** Evaluating the potential methods for acquiring necessary right-of-way, including eminent domain.
- **Phasing:** Considering the potential for acquiring right-of-way in phases.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Identification of Required Right-of-Way:**
 - What specific right-of-way is needed for the proposed traffic improvements, such as for widening roads, constructing new lanes, or creating turn lanes?
 - How much right-of-way is required for each improvement?
 - Are there any existing easements or other rights-of-way that could be used to reduce the need for additional acquisitions?
2. **Acquisition Methods:**
 - What are the potential methods for acquiring necessary right-of-way, such as negotiation, condemnation, or dedication?
 - What are the potential costs and timelines associated with each method?
 - Are there any environmental or regulatory constraints that could affect the acquisition process?
3. **Phasing:**
 - Can the acquisition of right-of-way be phased to minimize disruptions and costs?
 - What are the potential benefits and drawbacks of phasing the acquisition process?
 - How will the phasing of right-of-way acquisition be coordinated with the construction schedule for the project?

Emergency provisions and Fire

Emergency Evacuation

- **Identification of Emergency Routes:** Identifying both onsite and offsite emergency routes.
- **Intersection Analysis:** Assessing the potential for traffic congestion at key intersections during emergencies.
- **Traffic Improvements:** Identifying necessary traffic improvements to facilitate emergency evacuation.
- **Cost Analysis:** Estimating the costs associated with implementing emergency evacuation improvements.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Identification of Emergency Routes:**
 - What are the primary emergency routes in the area, and how will they be affected by the development?
 - Are there any new emergency routes that need to be created or improved?
 - How will the development's traffic impact the ability of emergency vehicles to access and evacuate the area?
2. **Intersection Analysis:**
 - What are the key intersections that could become congested during emergencies?
 - How will the development's traffic contribute to congestion at these intersections?
 - What are the potential impacts of congestion on emergency response times?
3. **Traffic Improvements:**
 - What traffic improvements are necessary to facilitate emergency evacuation, such as widening roads, improving signal timing, or creating dedicated emergency lanes?
 - What is the estimated cost of these improvements?
 - How will the effectiveness of these improvements be evaluated?
4. **Cost Analysis:**
 - What is the total estimated cost of implementing emergency evacuation improvements?
 - How will the costs be allocated among the developer, the county, and other entities?

EDH APAC appreciates the applicants' efforts to coordinate Emergency Evacuation elements with adjacent property owners, and reminds residents that EVA routes work for the benefit of both the proposed projects, as well as for adjacent properties (EVA routes both out of, and into

the proposed project property). However, EDH APAC would defer to the El Dorado Hills Fire Department's recommendations on Emergency Evacuation routes.

Emergency and Vehicle Access

- **Identification of Access Points:** Identifying all proposed access points, including emergency vehicle access points (EVAs).
- **Restrictions and Limitations:** Analyzing any restrictions or limitations on access points, such as through-traffic restrictions.
- **County Requirements:** Determining the county's requirements for access to the development.
- **Adequacy of Access:** Assessing the adequacy of the proposed access points, including design criteria, site distances, and acceleration/deceleration distances.
- **Signalization:** Determining whether the proposed main access road should be signalized.
- **EVA Design and Restrictions:** Analyzing the design and intended use of the proposed EVAs, including restrictions and maintenance requirements.
- **HOA Involvement:** Assessing the role of HOAs in the construction, maintenance, and operation of EVAs.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. **Identification of Access Points:**
 - What are the proposed access points to the development, including EVAs?
 - Are there any existing access points that may be modified or expanded?
 - How will the development's traffic be distributed among these access points?
2. **Restrictions and Limitations:**
 - Are there any restrictions or limitations on through-traffic access to the development?
 - How will these restrictions be enforced?
3. **County Requirements:**
 - What are the county's requirements for access to the development, including the number and type of access points?
 - How will the proposed access points comply with county regulations?
4. **Adequacy of Access:**
 - Are the proposed access points adequate to handle the expected traffic volume?
 - Do the access points meet the design criteria for site distances, acceleration/deceleration distances, and turning radii?
5. **Signalization:**
 - Should the proposed main access road be signalized?
 - What are the potential benefits and drawbacks of signalizing the access road?

6. EVA Design and Restrictions:

- What is the intended use of the proposed EVAs, and are there any restrictions on their use?
- How will the EVAs be designed to ensure that emergency vehicles can access the development quickly and efficiently?
- What maintenance requirements will be in place for the EVAs, including gates and other infrastructure?

7. HOA Involvement:

- What is the role of HOAs in the construction, maintenance, and operation of EVAs?
- Are there any agreements or contracts between the developer and HOAs regarding the EVAs?

EDH APAC recommends that agreements with adjacent property owners and HOAs be codified prior to project construction, and that Conditions of Approval be drafted as part of the project entitlements to fund and provide a backup administrative function to govern these agreements in the event of 1) sale of private property burdened with EVA routes, 2) the failure, or restructure of Homeowners Associations (on both the project property, and adjacent HOAs that are burdened with EVA routes) - these requirements must run with the land.

Fire Suppression - wildfire plan

- **Fire Suppression Systems:** Assessing the adequacy of proposed fire suppression systems, including water supply, hydrants, and firebreaks.
- **Wildfire Mitigation Plans:** Evaluating the effectiveness of the proposed wildfire mitigation plan in reducing the risk of wildfires.
- **Coordination with Local Agencies:** Ensuring coordination with local fire departments and other agencies involved in wildfire response.

Key Questions and Areas of Analysis

To provide a comprehensive analysis, the following questions should be addressed:

1. Fire Suppression Systems:

- Are the proposed fire suppression systems adequate to meet the needs of the development?
- What is the source of water for the fire suppression system, and is it reliable?
- How will the fire suppression system be maintained and tested?

2. Wildfire Mitigation Plans:

- What are the key components of the proposed wildfire mitigation plan?
- How will the plan be implemented and maintained?
- What are the potential effectiveness of the plan in reducing the risk of wildfires?

3. Coordination with Local Agencies:

- How will the developer coordinate with the El Dorado Hills Fire Department and other agencies involved in wildfire response?
 - Are there any agreements or protocols in place for emergency response?
 - How will the development's fire suppression systems be integrated into the local fire department's response plan?
-

EDH APAC Generations At Green Valley Subcommittee Comments

The APAC subcommittee submits the following comments listed below on the Generations at Green Valley DEIR. We have extensively researched and studied the more than 2000 pages of Documents and Appendixes for this project. We as a committee find a current rush to build mentality in the lack of adequate analysis of significant and community wide impacts.

INITIAL STUDY

El Dorado Hills APAC as the non-partisan volunteer Area Planning Advisory Committee that reviews a number of projects in the El Dorado Hills area is concerned with El Dorado County, as lead agency, waiving the Initial Study as part of the CEQA planning process. There are current projects that are negative declarations that the County is doing an Initial Study for. This is a project that requires not only one of the most significant General Plan Amendments from Agriculture and Low Density to Highest Intensity Density but additionally requires the highest and most incompatible density change for this region that is currently mostly low density 5-10 acre ranches to a high density subdivision defined by the County to be a Community Region to accept the highest intensity densities.

APAC finds The County of El Dorado as Lead Agency by choosing to “Waive the Initial Study” that is required by the Lead Agency to identify Impacts to include in the DEIR was arbitrary and biased. Many in the community questioned the fairness especially in light of the fact there are negative declaration projects the County are currently doing Initial Study's for. Additionally The Lead Agency, El Dorado County, had 1000's of pages, studies, meetings with stakeholders, developer, internal staff, cost analysis and knowledge of 100's of significant and unmitigable impacts but only gave the public 5 pages and 3 graphs of documentation for the NOP, Notice of Preparation.

VIOLATION OF THE BROWN ACT Another Element APAC takes significant issue with is The County held no public meetings during the NOP or DEIR. The only public meetings were Developer Presentations. The Lead Agency is required to hear public comments throughout this process by holding public meetings at milestones. One of which is taking comments from the public on what should be included in the DEIR. The County stated on the Notice of Preparation letter there would be a meeting in Placerville at the Planning Commission room on July 11th between 5:30pm-7:30pm to take public comment on what should be in the DEIR. This was a violation of the Brown Act.

The County's own statement in the Notice of Preparation "meeting to be held July 11th to take public comment of what should be included in the DEIR" and then not holding an officially noticed meeting violates the Brown Act. The meeting was held in the Planning Commission Room but not noticed as a planning commission meeting or noticed as any Lead Agency meeting, 2 Planning Commissioners were present, There was no noticing of this meeting to the public in Legistart as is required of an official County meeting. The meeting was called a presentation by the Developer and then the County said it was to take public comment on what was to be included in the DEIR. This is a significant violation of the BROWN ACT. This alone should stop this project from moving forward and require the County to do an Initial Study based on the 1000's of pages of information they have that the public doesn't have as well as The County's own statement in the Notice of Preparation "meeting to be held July 11th to take public comment of what should be included in the DEIR" and then not holding an officially noticed meeting.

NOP COMMENTS REQUESTED TO ANALYZE SIGNIFICANT IMPACTS IGNORED

The Generations at Green Valley Subdivision Draft Environmental Impact Report fails to show substantial evidence for the conclusions reached. The lead agency failed to address many significant responses to study requests and requests of analysis of impacts given in the NOP comments that were submitted to the County during the NOP comment period. Generations at Green Valley Subdivision Draft EIR either failed to analyze or makes light of the broad community impacts that will result from such a scale

of density increase in an area that is predominately rural and is supported only by a curvy two lane rural road, with little or no shoulders, multiple substandard driveway encroachments and lacking the necessary Geometric Standards and Safety Elements.

COMMUNITY REGION

The Generations at Green Valley DEIR severely fails to address this land being adopted into the Community High Density Region without proper environmental analysis

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”.

The Generations at Green Valley failed to analyze the Community Region applicability and compatibility of this designation when the proposed project is surrounded by rural zoning where 10 acre, 5 acre, and the western perimeter and smallest parcels of ½ acre.

The parcel was broad brushed with a designation of Community Region defined as the area to accept the highest intensity density zoning. The DEIR failed to analyze the CEQA requirement of compatible zoning and non compatible zoning and how it relates to this project with a high percentage of the 280 acres to have 6000 sf parcel and 10,000 sf parcel sites. The DEIR fails to analyze and identify the legal course the County took to incorporate this new designation of Community Region without changing the zoning or doing a General Plan Amendment but with a broad brush determined this land surrounded by existing rural zoning and identified as Agriculture grazing and low density for the parcel known as Generation will accept the highest intensity densities. The Project DEIR fails to analyze how this is not in conflict with the Zoning Ordinance that restricts rezoning if not compatible with existing uses. Existing uses are rural ranches and large parcels that would not be compatible with the designation of highest intensity densities. The location of the proposed subdivision is in the rural area that the County incorporated into a planning area that County of El Dorado identified in a designation term called the “Community Region”. The definition of the Community Region given by El Dorado County is a region to accept the highest intensity densities in El Dorado County. Back when the Community Region was designated the County was required to do a CEQA analysis parcel by parcel to analyze all impacts of the designation that was in significant conflict with the existing rural, low density zoning, agriculture, biologically significant, geologically significant and historically significant parcels. The County is on public record that it would take many years and be such a financial expense they deferred to “the Next Board” to start the process as members of the Board were terming out. The next Board nor the following Board ever did the analysis. The Board and County staff were alerted that this was in violation of CEQA. The then sitting Board changed the language of the General Plan and the Zoning Ordinance to accept the omission without fulfilling the CEQA requirement. This could have legal implications to the County and the risk to the developers for non compliance of CEQA when a blanket designation is incompatible with existing uses, existing Zoning and existing General Plan designation.

FINDINGS OF LESS THAN SIGNIFICANT

There is Inadequate analysis and conclusions in the Generations at Green Valley 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 Mitigations section. This is not fair to the Developer, The Developer's investors or the Residents Impacted by a large scale subdivision that does not have currently anywhere near the infrastructure to support it. And in trying to mitigate that, it asks a very rural side of El Dorado Hills to accept and support a density equivalent to a major urban city center.

INADEQUATE CONSIDERATION OF CUMULATIVE EFFECTS

There is Inadequate considerations of cumulative effects from the primary proposed access roads for 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 potentially 40% increase to vehicles per day onto Green Valley Road from this project. This is significant growth without the offsite traffic infrastructure to support the capacity. In the original proposed project "Dixon Ranch" which is still an option in Chapter 5 of the DEIR for 605 high density residential subdivision, the DEIR pulls out 90% of the offsite infrastructure that was analyzed in the original project. The DEIR fails to identify why the offsite infrastructure for the same or similar density would be removed from the project other than this caused the original Dixon Ranch project to be denied based on not meeting fiscal neutrality.

INSUFFICIENT ACCESSES AND CIRCULATION

The primary accesses for this proposed project is either through a non-standard already at capacity with steep 17% grade at Lima Way with no sidewalks or safe pedestrian safe streets infrastructure. 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. The DEIR fails to meet the road capacity and safety requirement in the transportation element of the General Plan. The DEIR highlights the failing of the project to meet the safety element and transportation element of the General Plan for circulation, safe streets, capacity, and adequate evacuation routes.

The project DEIR fails to analyze all Traffic Circulation and identify all study intersections. Traffic circulation, traffic safety improvements inclusive of improvements

at occupancy and improvements phased in and over future time periods. Conditions of a project must be transparent and fully analyzed and not based on assumptions such as “changing timing on a signal” as that was already proven not a viable option as changing timing on one leg of signal only lengthens it on other leg that is still an impact with traffic backup which significantly impacts Traffic Safety. The project DEIR fails to analyze traffic circulation throughout El Dorado Hills on significant and effected roads, including but not limited to Green Valley, Silva Valley, Bass Lake, El Dorado Hills Blvd, Francisco, as well as all internal subdivisions roads affected Aberdeen, Appian Way, Highland Hills, Loch Way, Sangiovese, Green Springs, Malcolm Dixon, Western Sierra and internal Serrano roads. The DEIR fails to analyze traffic circulation for all phases of significant and extensive utilities installed and construction impacts.

The DEIR fails to analyze significant offsite Traffic Geometrics of all improvements for this development for meeting site distance, safety, vehicle capacity, speed zones, curve data, acceleration/ deceleration lanes for accesses, right a way availability for improvements, signing, repaving, striping, drainage, impacts to adjacent uses, access, signal study, intersection widenings, relocation of existing infrastructure, and costs.

All study intersections need to be fully identified and analyzed with cost estimates of improvements and time frame of implementation. Comments such as improvements to intersection timing of Intersection X/Y would not be adequate analysis of Traffic Infrastructure needed for this level of project. If you increase timing to one leg you decrease it for the other. CEQA, requires mitigations to be realistic and timely and not be so vague that they are not practical to overcome significant impacts. The DEIR fails to analyze and identify meaningful and complete infrastructure for this project. The only transportation infrastructure improvements given are two signal timing and two driveways at the proposed entrance and exit of Green Valley Road. It says nothing about asphalt paving lane line to lane line inclusive of all signing striping and traffic control for 10,100 linear feet of open trenching for upsizing the 1600 ft of existing gravity wastewater and 8,500 ft of force main. It does not analyze or identify acceleration or deceleration lanes at the proposed project entrances under design speeds of Green valley Road nor the inadequate distance between the driveways to provide adequate acceleration/ deceleration on and off a high speed arterial parallel capacity main County Arterial Road. It only refers to them as pockets, pockets are for driveways. This is a high speed County Road Connection with a posted speed of 55mph not a driveway. This exemplifies the failure of the DEIR to consider the appropriate traffic infrastructure needed for this project. Driveway Access A & C off Green Valley Road are high speed acceleration and deceleration lanes that require major grading, geometric design and drainage. The signalized commercial access approach for this project is not a pocket. The Project DEIR even fails to use correct transportation infrastructure terminology. There are many flaws that the Lead Agency needs to not rush but to do a complete and

thorough analysis of this very controversial project that will require many exceptions, redesigns and incurred costs if not fully vetted up front. The DEIR must include a complete and thorough constructability review as is required on all projects.

OFFSITE UTILITY AND ROADWAY REBUILD COSTS

The DEIR fails to analyze the Utility And Roadway Rebuild Costs And Funding. It fails to identify significant planning, construction and inspection costs of all utilities. The DEIR fails to identify all alignments both new, combined capacity and rebuilt for the extensive network of utilities throughout the northern portion of El Dorado Hills offsite in and through existing neighborhoods required for this proposed subdivision project and to sufficient detail. The DEIR fails to analyze in any detail relocations and conflict with existing infrastructure. The DEIR clearly failed to analyze the funding breakdown of all aspects of the extensive utilities that will be needed to convert 280 acres of low density and agricultural grazing land to highest intensity densities of residential that is needed to support this subdivision Generations at Green Valley. The DEIR failed to address the NOP comments requesting that the DEIR include in analysis of costs all utilities: water, sewer, power, fiber, and any arial both onsite and offsite for new utility alignments, utility capacity upgrades, and replacement of existing utilities. As well as analyze the extensive cost to streets and roads for repaving of utility trenches through existing neighborhoods, surface streets and arterial roads such as Green Valley Road and Silva Valley Road. The requirement of lane line to lane line asphalt paving over a trench is industry standard when trenching through existing streets and roads. The DEIR failed to analyze the cost of full lane width asphalt paving in and throughout neighborhoods, surface streets and arterial roads. Failed to analyze and identify who will pay the cost of trenching then full width paving 1600 linear feet of gravity wastewater in Highland Hills, Highland View and Sterlingshire. Failed to analyze and identify the funding structure of the cost of 8,500 linear feet of force main from Highland Hills to Saint Andrews Lift Station. Including but not limited to administration costs, inspection costs, all materials, material testing, traffic striping costs, costs of traffic control, added costs of night work, added costs to access materials at night, cost of notifications, costs of loss to disruption of businesses. The DEIR fails to clearly identify all offsite utility infrastructure and alignments to a scale and detail sufficient to give clear indication of impacts and conflicts to decision makers and the public.

OFFSITE WATER/ OFFSITE SEWER

Offsite Water Improvements states new construction of a 10 inch pipeline from projects southern border to Greenview Drive in Serrano. Analyze and identify this alignment, capacity, construction impacts, temporary construction permits and maintenance easements with Serrano. Contracts With Private Roads And Subdivisions Analyze and Identify contracts for install and maintenance of infrastructure through private roads and

or private right of way. Construction Impacts Analyze the significant time interruption of the traveling public, analyze the significant impacts to residents and businesses on the north side of El Dorado Hills and throughout the limited commute arterial roads in El Dorado Hills. Analyze the sequence of construction of the extensive utility install identified and the number of years the residents will live under construction interruptions for the benefit of the Generations at Green Valley High Density subdivision. Analyze the significant and unmitigable noise to residences and businesses. Analyze the impact of the cost and operational logistics to notify residents, work at home residents and businesses of utility construction open trench crossings when impacting their accesses, noise from construction activity as well as outages. Analyze all impacts of construction when utilities are trenched through existing roads and through existing neighborhoods as well as main arterials of El Dorado County. Analyze construction impacts to emergency vehicles and emergency routes. Clearly show all alignments and substantiations for alignments. It took 2 years to put a fiber line through Highland Hills and they did not go back and cover the sand slurry for over a year leading to extensive water intrusion under the pavement. Pictures taken, reported to the County. This road is now damaged due to a faulty fiber install. Will the repairs to the road damage come from the District/ El Dorado Hills road budget paid by the taxpayers of El Dorado Hills/ El Dorado County? Analyze and Identify costs associated with damage to existing infrastructure and who pays for them. Analyze and identify capacity of utilities. Include analysis of utilities on steep grades for life cycle, maintenance, and cost. Analyze and identify any existing utilities that are to be shared with Generations at Green Valley High Density Subdivision to sufficient scale and detail to inform decision makers and clearly identify all impacts. The project indicates a connection to an 8" water distribution pipeline within Lima Way. The 8" water distribution was not designed to support the high density subdivision and was installed before a "Community Region" designation of highest intensity densities was broad brushed over this 280 acre parcel. Analysis shall be done to determine if potable water line capacity exists that will not cause a drop in pressure or hammering of water utility damaging existing property by the connection at Lima Way in the Highland View. The DEIR fails to analyze and Identify to sufficient scale all proposed utilities along alignments so that decision makers, tax payers, ratepayers, residents and businesses impacted can see the magnitude of the build in and throughout Northern El Dorado Hills and have an understanding of the significant and unmitigable conflicts both constructability as well as the limited circulation of roads impacted for years that residents will be subjected to for the benefit of this subdivision.

The DEIR fails to analyze and identify with sufficient scale and detail which utilities are tie-ins to existing to share capacity, which utilities are open cut to upsize utility and which utilities are open cut new installs. The project indicates connection to existing 8" gravity wastewater within Lima Way at the top of Aberdeen Lane in Highland View. This wastewater conveyance alignment is through Highland View, Highland Hills and

Sterlingshire following an 17% grade near the top of Aberdeen Lane near Lima Way in Highland View. An analysis for blow out velocity at added capacity needs to be made by a qualified sewer design engineer. The DEIR fails to analyze service operation under added capacity as well as due to steep terrain 17% at top of Aberdeen Lane in Highland View. DEIR fails to analyze condition and service life of pipe with a camera inspection of existing 8" gravity wastewater. Thrust blocks should be verified from as-built drawings. The project indicates upsizing approximately 1,600 linear feet of existing gravity wastewater pipeline upstream of the Highland Hills Lift Station. All alignments shall be clearly analyzed and identified with mapping to sufficient scale and detail that conflicts can be clearly identified in the DEIR/ EIR. The DEIR continues to lack sufficient scale and detail for all off site utilities needed to support the project. For example gravity utility lines are usually first installed with improvements and construction occurring post install. After many years after install there could be potential conflicts with upsizing if something was built within the minimum offset zone, such as other utilities, fiber and electrical are typical ones, foundations, culverts and drainage are very common, structures and many others. Without a full analysis this could require a complete realignment or section of realignment and or moving of what is in conflict. The DEIR fails to analyze and Identify all alignment constructability and costs associated with any relocated infrastructure. The DEIR fails to analyze and identify the funding structure of this 1600 linear feet upsizing to gravity wastewater. Analyze what portion of this extensive utility build is to be funded by the County, paid by the rate payer, identified as funded by Zone of Benefits or any other funding structure. Many of the utilities here in the El Dorado County foothills are a ½ to ⅓ of their life cycle due to terrain, corrosive soils, high subsurface water washing out trench material which leads to joint failures, uplift from subsurface water and underground spring activity among other issues. The Lead agency must do a full analysis of each utility and its actual condition and capacity as well as identify actual and potential conflicts in order to provide decision makers with accurate and full information on the enormous undertaking and cost associated with just the utility and public services portion of this project.

TRAFFIC CONSTRUCTION CIRCULATION / TRAFFIC CONTROLS DURING CONSTRUCTION

The DEIR fails to analyze Traffic Circulation during construction of these large utility builds that will potentially affect El Dorado Hills region wide, Bass Lake, Cameron Park, Green Valley Road from Folsom to Rescue. The project indicates construction of approximately 8,500-linear feet force main from the Highland Hills Lift Station to an existing 15-inch gravity wastewater pipeline that flows to the St. Andrews Lift Station. The DEIR fails to analyze alignment, full costs and all impacts of 8500 linear feet of force main. Analyze and identify funding structure for this extensive and costly 8,500 linear feet of force main. What percentage is distributed to existing El Dorado Hills, El Dorado County, Bass Lake, Green Springs, Malcolm Dixon, Serrano Residents and all

Western Slope Communities both directly and increases in rate upcharges. The DEIR needs to provide sufficient analysis to allow decisions to be made regarding the proposed project, without making assumptions that are fatal flaws when construction begins. These fatal flaws that occur in prior projects are a product of not having a full analysis and full disclosure of conflicts and impacts. CEQA law requires full and complete analysis be provided to all decision makers, responsible agencies and the public. Too many projects put an assumption in the NOP and EIR only to have to redesign and incur costly design changes, alignment changes, dual capacities not disclosed and added at last minute which are passed on to the County, Rate Payer, Residents, and Zone of Benefits which the residents pay for. The DEIR fails to analyze and identify full constructability reviews to determine cost equity and fiscal neutrality of the project. This is critical to give the public and the decision makers the true accurate cost that will be incurred by the County, the existing residents and the rate payers. Traffic Control costs are some of the highest costs of a construction project. The DEIR fails to analyze logistics of constructability along with accident prevention in work zones, especially with traffic controls on Green Valley Road and the costs associated. Again this is a significant and unmitigable impact that has been ignored in the DEIR.

ZONE OF BENEFITS

Is defined as an area identified as benefiting from the improvements and incorporated as a funding source to pay for a portion or percentage of the developers infrastructure costs. In reality these areas can be not benefitting but be incurring significant impacts. The Zone of Benefit must be thoroughly and clearly disclosed both in mapping,

alignments, engineering reports and costs. Justification of Zone of Benefits must be demonstrated and analyzed. Existing neighborhoods that will be absorbing significant costs of this development under “Zones of Benefit” must be clearly analyzed and transparent to the public as well as all decision makers.

FIRE SUPPRESSION / EVACUATION ROUTES/ MODEL ROUTES Analyze fire suppression requirements, infrastructure to provide fire suppression, adequacy of water availability for fire suppression. Full analysis of State Fire Safe and Fire Wise Practices for the project and how the surrounding region is impacted. Analyze Evacuation routes and model the routes at both peak commute hours and all school commute hours. An incident 15 years ago closed Hwy 50 for four hours causing gridlock on Green valley Road. It was documented by a resident and reported to the County that it took 2 hours to go 2 miles. Green Valley Road is the only parallel capacity arterial road that serves El Dorado Hills that extends from Sacramento County into El Dorado County. Traffic Infrastructure Historically El Dorado Hills has seen projects approved and Improvements delayed for decades if ever put in due to not overcoming design elements that were not identified and analyzed fully in the project planning documents

or assumptions made without adequate analysis.

DRAINAGE

The DEIR fails to fully and with sufficient detail analyze watershed as well as drainage both onsite and offsite resulting from the proposed project. Analyze and identify Water retention ponds and intended use, will these be primarily for fire suppression?

Analyze

the quantity of watershed hydrology that will contribute to all surrounding developments. Specifically, Analyze drainage contributed to Highland View, Green Springs Ranch, Serrano Western Sierra Way, and Green Valley Road. Analyze the specific drainage infrastructure needed for this project both on site and offsite. A complete Hydraulic Study needs to be provided and analyzed. Drainage planning and design is a significant project element and critical in the foothills where seasonal flows can be short term with erosive and flooding potential.

PUBLIC SERVICES

Analyze all Public Services that will be required by this project. The costs of these Public Services and the Funding Sources. Analyze costs and identify who will absorb the costs of these Public Services. Costs that are assigned to a Zone of Benefit should clearly analyze benefit and show transparent costs to existing and surrounding neighborhoods. Water Supply Analyze existing entitlements and water resources for the project. The prior Dixon Ranch project denied by the Board of Supervisors indicated inadequate entitlements, The DEIR fails to analyze how this has changed. Right Of Way Analyze Right of Way needed for improvements identified in project at build or at some time in the future.

LEFT TURN LANE AT LOCH WAY

The County does not own the Right of Way that would allow installation of a 2-way turn lane at Loch Way for instance. The DIER fails to analyze the needed left turn into Loch Way that was included on the previous project, Dixon Ranch. It was demonstrated that rear ends from traffic westbound on Green Valley approaching Loch Way are a significant safety issue. Why has this been removed from the project? The DEIR fails to show how this significant impact will be mitigated.

Analyze all right of way needs for evaluation of infrastructure to be a realistic consideration. Acquiring the Right of Way along Green Valley Road could likely be through eminent domain (taking of private property) at some locations. Analyze all locations that could potentially require additional Right of Way . Offsite Improvements Analyze all offsite improvements for design, right of way, operational needs, timing of installation. Identify what improvements will be required at- build

and identify any sequenced improvements as well as costs and funding of costs. Analyze what improvements will be required prior to issuance of building permits for the project. Analyze and identify improvements for Condition at Occupancy.

CONDITIONS OF APPROVAL

The DEIR fails to analyze all onsite and offsite improvements that will be conditioned Prior to Approval of the Project along with Funding structure. funding structure.

EMERGENCY EVACUATION

The project DEIR fails to come close to any adequate analysis of the significant impact of emergency routes both onsite and off site. The DEIR fails to adequately model evacuation routes giving realistic times as well as provide a complete and thorough analysis of access of emergency vehicles since large portions of Green Valley Road have no shoulder and would make sections impassable in an emergency or evacuation. .

PEDESTRIAN FACILITIES AND INFRASTRUCTURE

A project this size would attract pedestrian and bicycle traffic onto Green Valley Road. This is a major parallel capacity arterial road connecting Sacramento County with El Dorado County. The DEIR for Generations at Green Valley fails to include any analysis for pedestrian and bicycle facilities that would be required as part of ADA and Complete Streets as well Traffic Safety Improvements necessary for pedestrian and bicycle transit to public centers, CSD parks, and trails. The project states it will build trails and community park which will attract pedestrians yet again the recurring theme is all off site infrastructure that was previously included in the Dixon Ranch Project including study intersections has been removed from the project to avoid not achieving fiscal neutrality.

TRUSTEE AGENCIES/ RESPONSIBLE AGENCIES

The DEIR fails to show how the project is engaging Trustee and Responsible Agencies on critical elements of the project. There is asbestos identified on this parcel, riparian creeks that call to be filled in, wetlands that call to be filled in, significant drainage rerouting, significant loss of wildlife habitat, significant loss in biological resources, 56 acres of oak trees that are called out for removal.

The Generations DEIR fails to identify the Trustee Agency and the element of the project that it will have specific jurisdiction over as well as any acceptances needed form

Trustee Agencies. The project should include all analysis, approvals and exceptions given by Trustee Agencies. The following list is not all inclusive. • California Department of Fish and Wildlife (CDFW)- Section 1602 Streambed Alteration Agreement; • Central Valley Regional Water Quality Control Board (CVRWQCB)- StormWater Pollution Prevention Plan (SWPPP) approval prior to construction activities pursuant to the Clean Water Act; • El Dorado County Air Quality Management District (SCAQMD)- Approval of construction related air quality permits; • U.S. Army Corps of Engineers (USACE)- Section 404 Clean Water Act permit. Responsible agencies must actively participate in the lead agency's CEQA process and consider the lead agency's environmental document prior to acting upon or approving the project. Without a complete and thorough Initial Study affording a complete NOP the Responsible Agencies will not have the minimum information to determine impacts of their responsibility or specialized interests and this has delayed projects. Ground Water Analyze groundwater impacts from drawdown, limitations of groundwater recharge or intrusion. Analyze water rights of surrounding existing parcels on wells. Is septic, recycled water or wells proposed for this project? If so, analyze all elements and effects on existing and surrounding properties.

PARCEL APN 126-150-023

The DEIR fails to identify why this portion of the project is being removed as part of a Boundary Line Adjustment and being processed under a separate application. The NOP comments requested the Lead Agency identify why the project is requiring this separate application to be separated and piecemealed but is integral and project reliant.

EVA, EMERGENCY VEHICLE ACCESSES AND MAIN ENTRANCES AT GREEN VALLEY ROAD

The prior project was required to provide three full unrestricted accesses triangulated equidistance on the perimeter of the property. The Generations Project shows two full

use encroachments for the proposed project accessing Green Valley Road (Commercial Driveway A & C) with two EVA's, emergency vehicle accesses, at Lima Road to Highland View and at Green Springs Road through Green Springs Ranch. The DEIR fails to identify the County requirement for access for this development. The project appears to be reliant on the two EVA's, to meet access requirements. The DEIR fails to analyze the adequacy and design criteria of the two roadway connections A and C onto Green Valley Road for this 280 acres of high density designation subdivision. The DEIR fails in analysis of approach design curve data, site distances, acceleration deceleration separation distances as well as other significant geometric elements that if not analyzed can increase costs or require major redesign of the project.

The project appears to be reliant on the two EVA's identified at Lima and Green Springs Road. Emergency vehicle accesses are not planned or designed to meet full use

encroachment criteria although the DEIR identifies Lima Way not as a Emergency Vehicle Access but an access with restricted use and calls for it to be operated and monitored by the HomeOwners Associations. This is a significant failure of the DEIR to clearly identify how Lima will be restricted and what resources, if any the HOA's will be given resources to operate/ maintain or block it if it became necessary. The NOP comments requested that the project proponent clearly state the EVA's restrictions and method to restrict through traffic. The DEIR failed to clearly identify maintenance of EVA infrastructure of gates installed, and identify contracts with HOA's for construction, maintenance and operation of EVA's.

ACCIDENT DATA, DESIGN SPEEDS, SPEED SURVEYS

The DEIR fails in Analyze accident data, design speeds and previous speed surveys. The area is known to residents for its high accident rate with higher average vehicle speeds than posted speed limit. This segment of Green Valley Road is on a horizontal Vertical Curve that will need to be analyzed for site distance of intersection of the two road connections onto Green Valley Road (Access C & A) for vehicle traffic heading eastbound on Green Valley Road.

ECONOMIC ACCOUNTABILITY

The DEIR fails to present an accurate economic accountability cost benefit analysis for the project. The DEIR has removed much of the offsite improvements from what was previously presented with the previous project. Much of the traffic, drainage, safety, pedestrian, ADA improvements still exist but they are removed from the project to get around fiscal neutrality.

SUMMARY

In Summary this is only a partial and limited identification of significant elements of this project that will have significant regional impacts and costs. The Lead Agency, El Dorado County, must provide a thorough and complete Initial Study with identification of all elements that could have potential significant mitigable and unmitigable impacts. This is not anywhere near an acceptable DEIR as it removes much of the offsite traffic infrastructure to support this project that was identified in the previous project. The alternative of 605 houses is still there in Chapter 5 under alternatives, if it is being proposed as an alternative then all infrastructure needed to support that alternative must be analyzed and significant impacts mitigated.

Our Board, our Staff and our Planning Commission are entrusted to provide a process that gives our decision makers, responsible agencies and the public a document that presents clearly and in entirety the full impacts and the costs of the proposed project. EDHAPAC appreciates the opportunity to review and provide feedback on proposed development projects to mitigate impacts in our El Dorado Hills

Community. Through question and feedback, our goal is to realize the best possible project outcome for our community, the project applicants, and for El Dorado County

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. 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 required. 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 leaves out 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 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. 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 Generations at Green Valley project is proposing and associated unresolved traffic impacts.

Of significant failings is the environmental document meant as a tool for decision makers does not provide any economic accountability or cost benefit analysis of the project. It does not disclose any costs associated with the true and full mitigations to bring them into Less than Significant and negates very important and costly elements such as right of way acquisition, geometric design, large utility builds, drainage, and full disclosure and cost analysis of improvements. The DEIR needs to disclose fully the complete improvements, Right of Way required and available as well as the costs to implement.

Concerns submitted by the Community

Generation DEIR feedback Linda Campbell Aug 2024

Housing

Only referencing “lots” and not actual dwelling unit counts. The developer could confirm that there will only be one dwelling unit per lot, since those are assumptions made throughout the analysis from other departments.

El Dorado County Ordinance Section 130.24.020 allows 1 primary dwelling plus 2nd dwelling per lot in HDR zoning, and General Plan policy 2.2.1.2 allows 1-5 per acre, so would like to confirm only one per lot.

Also related to the type of dwelling, are any of these intended to be categorized as affordable? If so, then what is the projected income level designation (medium, low, very low, etc)?

What is the estimated timeline for the project (start and end), factoring in when infrastructure is planned to be available?

Green Springs Rd.

Since Green Springs Rd is a private road, then is there some agreement not mentioned that the project can use that road for the EVA gate or anything else?

Lima Way

Will this EAE be gated in only one direction? In other words, is it only for people exiting Generations, or would it also be opened in an emergency if needed for those exiting Aberdeen Way?

Drainage

How long does this take, and what happens if the permit and/or alteration agreement are not approved?

”These improvements would require permitting under the federal Clean Water Act (Section 404) from the U.S. Army Corps of Engineers, federal Clean Water Act (Section 401) certification or waiver with the Central Valley Regional Water Quality Control Board, and approval of a streambed alteration agreement (1602 Permit) from California Department of Fish and Wildlife Service.”

Oak Woodland Resources

Appendices page 333: Is mitigation other than payment still allowed? I would like staff to confirm that there are alternatives to payment, and the county will not be responsible for any payment based on the conservation agreement between Rural Communities United and the County (agreement made 2022).

Offsite Infrastructure Cost

What is the total cost to the public for offsite infrastructure?

Request to review the Fiscal Impact Analysis that the applicant stated they provided for review.

Grazing / Agricultural

Since these parcels are in a rural region, then they should be evaluated by the Ag Commission in regard to grazing viability according to Policy 8.1.2.2. This was part of a historical ranch, and the current Draft EIR refers to the fact that seasonal grazing still occurs on these parcels.

Parcel Number	Current Acreage
126-020-001	20
126-020-002	140.5
126-020-003	80

126-020-004	9.66
126-150-023	39.39

Safety – Evacuation Planning

There is no standard mass transportation available in this location. Particularly since this is intended to be primarily age-restricted, are the homeowners required to have their own transportation? If not, then what would be the plan, or the risk associated with evacuation requirements and people not being able to evacuate on their own?

Application/Documentation Updates

In a few different meetings the applicant has brought up changes that were being made, but how will they move forward and be included in documentation for ongoing reviews?

A couple examples that were brought up in August 14, 2024 meeting:

1. Statement that now they were introducing 10% affordable housing in the age-restricted
2. The turn directions on/off Green Valley Road, which are different than what is represented in the maps on Draft EIR.

New Roadway Impacts on other Parcels

It is not clear if the new roadways into the planned parcels cross those owned by others. If they are identified, then can the specific sections be provided in response? Has approval been received from those property owners and, if not, is the county planning to use eminent domain to cross their land for this development?

Reminder on Measure E

Section TC-Xa 7: Before giving approval of any kind to a residential development project of five or more units or parcels of land, the County shall make a finding that the project complies with the policies above. If this finding cannot be made, then the County shall not approve the project in order to protect the public’s health and safety as provided by state law to assure that safe and adequate roads and highways are in place as such development occurs.

EDH APAC appreciates the opportunity to review and provide feedback on proposed development projects to mitigate impacts in our El Dorado Hills Community. Through

question and feedback, our goal is to realize the best possible project outcome for our community, the project applicants, and for El Dorado County.

EDH APAC Generations At Green Valley Subcommittee

El Dorado Hills Area Planning Advisory Committee

“Non-Partisan Volunteers Planning Our Future Since 1981”