

# El Dorado Hills Area Planning Advisory Committee



## APAC 2021 Board

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

The County of El Dorado Planning and Building Services Department

2850 Fairlane Court  
Building C  
Placerville, CA 95667  
ATTN: Rommel Pabalinas, Planning Manager

RE: Central El Dorado Hills Specific Plan 2nd Recirculated Draft Environmental Impact Report A14-0003, SP12-0002, SP86-0002-R-2, Z14-0005, PD14-0004, TM14-1516, DA14-0003

Mel,

The El Dorado Hills Area Planning Advisory Committee (EDHAPC) would like to provide the following public comment on the 2nd Recirculated Draft Environmental Impact Report for the Central El Dorado Hills Specific Plan project.

**June 10, 2021**

## **EL DORADO HILLS AREA PLANNING ADVISORY COMMITTEE**

### **REVIEW AND COMMENT: SECOND PARTIAL RECIRCULATED DRAFT EIR, CENTRAL EL DORADO HILLS SPECIFIC PLAN**

The El Dorado Hills Area Planning Advisory Committee (EDHAPAC) has reviewed the Second Partial Recirculated Draft EIR for the Central El Dorado Hills Specific Plan (RDEIR).

Because the County and Applicant added a new alternative, Zoning-Consistent, to the RDEIR, it is appropriate at this time to state that Alternative 1 "No-Project" and Alternative 4 "Zoning-Consistent" are more aligned with the desires of the community than the project as currently proposed. This finding is based on:

- The content of the January 6, 2020, EDHAPAC report which concluded, in part: ".the proposed project does not provide adequate benefits to El Dorado Hills, or El Dorado County, to merit a General Plan Amendment, or to justify the rezone of the old Executive Golf Course property."
- The clear opposition to the currently proposed project as voiced by community members at the three Planning Commission meetings contemplating the Central

El Dorado Hills Specific Plan (CEDHSP). The last meeting was held at the District Church in January of 2020.

- The CEDHSP proposal has not changed in any material respect since the January 2020 Planning Commission Hearing held in El Dorado Hills at District Church

The EDHAPAC has the following comments with respect to the RDEIR:

## **1. 4.3.4 ALTERNATIVE 4—ZONING CONSISTENT**

- A. EDHAPAC agrees with Kirk Bone of Serrano Associates, LLC: The Zoning-Consistent alternative is the same as the “no project” alternative (Kirk Bone comments at the May 12, 2021, EDHAPAC meeting and May 27, 2021, Planning Commission workshop). As such, it should not be listed as a separate alternative in the RDEIR. Rather, salient points from paragraphs under section 4.3.4 should be incorporated into and made consistent with paragraphs under section 4.3.1.
- B. EDHAPAC recommends that the RDEIR identify which uses noted as “zoning consistent” are “by-right” and which are by Conditional Use Permit.
- C. EDHAPAC recommends that the RDEIR clarify that uses on the property must be consistent with the General Plan Open Space designation and the Recreational Facilities-High zone. This means the primary use must be for recreation and that uses identified in the RDEIR such as hotels and general merchandise are to be in support of a recreational facility.

Section 130.25.010 of the El Dorado County code: “The RFH Zone applies to regulate and promote recreational uses and activities with high concentrations of people or activities or a more urban nature, such as recreational vehicle parks, sports field and complexes, and amusement parks or facilities that are primarily located in Community Regions and Rural Centers.” All land use detailed in Section 130.25.020 Matrix of Allowed Uses are subordinate to this paragraph.

## **2. 4.3.4.1 AESTHETICS**

- A. EDHAPAC recommends that the RDEIR identify which uses noted as “zoning consistent” are “by-right” and which are by Conditional Use

Permit.

- B. In light of the fact that the goal of this paragraph is to identify potential uses that are Zoning-Consistent, EDHAPAC recommends the RDEIR state explicitly that the Zoning-Consistent height-limit is 35 feet. This is important given that the RDEIR states that zoning consistent uses may “involve large structures.”
- C. EDHAPAC takes issue with the statement that the “impacts on the visual character would be greater (under the “zoning consistent” alternative) than under the proposed project due to more intensive development of the former Executive Golf Course parcel and the residential development along the ridgelines.”

The DEIR offers no support for this conclusion. Rather, it appears Zoning-Consistent development of the former Executive Golf Course parcel would be less intensive than medium and high density housing under the current proposal. Further, the development of the lots C and D under the existing El Dorado Hills Specific Plan do not appear to have greater impact to “important public scenic views along the US 50 corridor” when compared to the moderate and high density housing proposed on the golf course parcel.

### **3. 4.3.4.13 RECREATION**

- A. EDHAPAC is concerned that this section analyzes reduced opportunity for public parks as a requirement of development without analyzing the effect on overall recreation. For example, this section of the RDEIR does not even mention the recreational opportunities that would be offered by developing the 98-acre former Executive Golf Course as recreational facilities. Contrary to the RDEIR, it appears the opportunity for recreation is greater under the Zoning-Consistent alternative than under the current CEDHSP proposal.

Further, the DEIR states “Effects of the Zoning-Consistent alternative on the deterioration of existing neighborhood parks would, therefore, be greater than those associated with the proposed project...” without explaining how the Zoning-Consistent alternative would cause a deterioration of neighborhood parks.

**4. 4.3.4.14 TRAFFIC AND CIRCULATION**

- A. EDHAPAC is concerned that the RDEIR states “The public trail system that would be constructed under the proposed project would not be constructed under the Zoning-Consistent Alternative. Therefore, implementation of this alternative could conflict with planned pedestrian and transit improvements.”

The reality is a public trail system might be required by the County as part of issuing Conditional Use Permits or variances for project development. The correct wording should be “The public trail system....might not be constructed under the Zoning-Consistent Alternative.”

**5. VMT Analysis**

- A. The sections dealing with VMT and associated analysis appear to be consistent with El Dorado County’s VMT Methodology.

EDHAPAC appreciates the opportunity for thoughtful review of development projects proposed in the El Dorado Hills area, and believes that allowing for resident feedback to planning issues provides a framework for the best possible project result; for project applicants, El Dorado County, and our El Dorado Hills community.

Respectfully,

John Richard  
El Dorado Hills Area Planning Advisory Committee CEDHSP Subcommittee Chair