

# El Dorado Hills Area Planning Advisory Committee



## APAC 2024 Officers

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The County of El Dorado Planning Department  
Director of Planning: Karen Garner  
2850 Fairlane Court  
Building C  
Placerville, CA 95667

Monday July 1, 2024

RE: 2024 third and fourth quarter project processing schedule

Director Garner,

The officers and members of the El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to take an opportunity to register some concerns that our organization, and our community, have in regards to the suggested project review schedule for the third and fourth quarters of 2024.

Based on comments and updates from Planning Commissioners, it has been suggested that the following items are scheduled before the Planning Commission:

- **July 11** [Generations At Green Valley](#) EIR presentation.  
379 single-family residential lots, 1 Park lot, 1 clubhouse, 9 open space lots, 13 landscape lots, and 3 road lots on Green Valley Road in El Dorado Hills. Public Scoping Meeting was held on March 12, 2024
- **July 25** [Town and Country Village El Dorado](#) EIR presentation  
Two hotels, two restaurants, a museum, an event center, associated parking, 56 residential cottages for employee housing, and an additional 56 residential cottages that may be rented on a daily or extended stay basis. Public Scoping Meeting was held in August 2024
- **August 8** [Village of Marble Valley Specific Plan](#) and [Lime Rock Valley Specific Plan](#) informational.

**Marble Valley SP** – 2,342 acres of land consisting of approximately 3,236 dwelling units and 475,000 square feet of commercial. The project is located in between El Dorado Hills and Cameron Park area south of Highway 50. Public Scoping Meeting was held in March 2013

**Lime Rock Valley SP** – Lime Rock Valley Specific Plan proposes for the development of 740 acres of land consisting of approximately 800 dwelling units. The project is located south of Highway 50 in the Cameron Park area. Public Scoping Meeting was held in March 2013

This suggests that most of these projects would be back with their completed Final EIRs, and seeking their project approvals and entitlements by the end of the 2024. In fact, multiple applicants have told EDH APAC that they intend to have their projects processed and approved by “this board” before the end of the year.

This also puts multiple major development projects before planning commissioners, elected Supervisors, and residents during several seasonal holidays, when residents, County Staff, and decision makers already have full schedules.

### **Planning Department remains consistent with State Law, and County policies and ordinances.**

It is important to note that EDH APAC recognizes not just the need, but also the Planning Staff’s commitment to, processing project applications and reviews in accordance with State law, and the County’s own policies and ordinances.

EDH APAC also understands the commitment of the Planning Department to the Board of Supervisors’ recent ‘Improvements to the County’s Development Review Process’ resolution, with the goal to offer efficient and predictable processes. However, to most residents, general plan amendments, community region changes, and zone changes go beyond the ordinary of what might be considered as “predictable” due to their out-of-the-ordinary nature, and what must be studied, analyzed, and vetted in the discretionary review process.

## **Applicants commenting on the nature of the approvals process schedule setting.**

In the past year, several applicants have suggested to EDH APAC that the Planning Department determines the schedule of the entitlement and approvals process, and have offered that such scheduling was beyond their control. This is counter to what residents have heard from Planning Staff, and from County agencies. And while these comments are probably offered as a 'marketing' effort to provide a certain perspective to benefit developers, when they are repeated, it doesn't benefit applicants, staff, or County residents.

In the past several years we have seen examples of applicants specifically setting the schedule. Scoping meetings and NOPs for DEIRs for projects in 2013, with the resultant DEIR finally being released to the public in 2024. Eleven years to prepare DEIR documents, and yet the public is limited by CEQA statute to 45-60 day public review periods to study and analyze 5000 pages of DEIR documents and supporting appendices.

The Generations at Green Valley residential development project is another large project. The NOP for the Draft EIR was provided in late February 2024, and the Scoping meeting was held in mid-March 2024. The intent of the Scoping meeting is to inform the environmental review process - yet, 107 days after the scoping meeting, the DEIR was released. To EDH APAC, it appears that the scoping meeting was merely a formality, a checkbox for CEQA - with only 107 days between the scoping meeting and the release of the DEIR, it would seem that the DEIR was essentially already completed prior to the Scoping Meeting. EDH APAC was further disappointed that the Initial Study for the project was waived, prior to the Public Scoping Meeting - missing another opportunity to better establish and inform the potential environmental impacts of the project.

The CEDHSP project that received an unanimous advisory recommendation for denial from the Planning Commission in June 2022 then sat for eighteen months, pending a hearing at the Board of Supervisors, that was eventually tentatively scheduled for late January 2024, but was finally canceled due to the close of escrow on the sale of the property, and the withdrawal of the project.

From these simple examples, in many impactful ways, applicants do direct the timing of project reviews, and public hearings. EDH APAC certainly recognizes the rights of applicants to shepherd their projects as they move forward through the review and entitlement process to meet required dates and timelines. In fact, when consulting with

project applicants about public discussions at EDH APAC meetings, my message to every applicant as EDH APAC Chair is consistent - we allow for project applicants to present their projects at a time that most benefits the needs of their project. We simply believe that the collaborative nature of project review should also allow time for thoughtful consideration by residents to provide input and feedback.

## **Large Projects and impactful projects require adequate public review.**

When considering the 1,000 residential unit CEDHSP project between 2019 and 2022, the County determined that the scope and impacts of the project on the El Dorado Hills community required significant review and discussion. The County chose to conduct **four** public Planning Commission Hearings, with one hearing held in the evening locally in El Dorado Hills to allow residents to attend - over 500 community members took advantage of the hearing schedule to attend in person.

We have a slate of multiple development projects proposed in El Dorado Hills that would be of similar impact - in fact the Village of Marble Valley Specific Plan proposes development at a factor three times the size of the CEDHSP project. The Lime Rock Valley Specific Plan proposes a similarly sized residential development as the CEDHSP, yet in this instance, it appears that both projects may be analyzed as a single intertwined project. For the CEDHSP project, EDH APAC suggested that the two plan areas should be considered and analyzed as separate projects, but they were analyzed as a single project. For the Marble Valley SP and Lime Rock Valley SP, these have been submitted as two separate projects, but are being analyzed and processed as almost one project. Certainly the projects do have commingled impacts, but are we truly reviewing and analyzing two projects, or one? EDH APAC recommends that each project be reviewed by the Planning Commission separately.

If the CEDHSP merited four Planning Commission hearings for a 1000 residential unit development across 336 acres in two plan areas, EDH APAC suggests that the Marble Valley SP with 3,236 dwelling units and 475,000 square feet of commercial across 2,342 acres, the Lime Rock Valley SP with 800 dwelling units across 740 acres, and the Generations at Green Valley project with 376 residential units across 280 acres should consider at least one Public Planning Commission Hearing with applicant presentations, staff presentations, and public comments. EDH APAC would recommend a second Public Planning Commission Hearing for each of the projects to solely allow for Commissioner deliberations, and analysis. These Public Planning Commission Hearings could be scheduled back to back, with the Applicant, Staff, and public

comments considered on day 1, and the Commission deliberations held on day 2. If not held on consecutive days, then they could be held over consecutive weeks, or, at the discretion of the Planning Commission, they could be held at planned consecutive Planning Commission meetings (the typical second and fourth Thursdays of each month).

### **Fairness to applicants - Fairness to residents**

With the focus of major development in El Dorado County isolated to just a few community regions, and El Dorado Hills being the the community region most impacted, residents believe that thoughtful review and analysis of impacts on our community, especially for projects seeking massive entitlements such as General Plan Amendments, Zone changes, the establishment of new Specific Plan Areas - with the accompanying ability to alter tentative maps and land use over several decades, along with 20 to 30 year Development Agreements, that we have only one opportunity to get it right, as entitlements granted are permanent. Our ability to have positive input on what our community becomes is integral to our identity and our quality of life. Our desire is to maintain consistency with State Law and County Policies. We certainly want to make sure that any approved development is structured in a manner that offers the applicant the best opportunities for success, and to provide growth in a manner in El Dorado Hills that mutually rewards the applicant and our community.

Respectfully,

**John Davey Chair, Tim White Vice Chair,  
John Raslear Vice Chair, Brooke Washburn Vice Chair**

### **El Dorado Hills Area Planning Advisory Committee**

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