**El Dorado Hills Area Planning Advisory Committee**

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The El Dorado Hills Area Planning Advisory Committee (EDH APAC) in conjunction with input from El Dorado Hills residents working on our Town & Country Village El Dorado 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

**Town and Country Village El Dorado: Draft EIR**
(General Plan Amendment GPA22-0001, Rezone Z22-0001, Tentative Subdivision Map TM22-0001, Development Agreement DA24-0001)

# EDH APAC Officers' & Subcommittee Comments

## Project Area vs Program Study Area

EDH APAC understands the intent of trying to define the additional program study area, to avoid a 'serial' project, or a 'piecemeal' project approach, as required under CEQA. However, despite the recommendations from planning staff, and the DEIR consultant(s) to consider the program study area as part of the project, the result is precisely what was intended to be avoided - a proposed project, and an undefined program area with no specific project details that seeks changes to the Bass Lake Hills Specific Plan prior to a formal project, and actual details and data being proposed.

EDH APAC believes that any programming changes to the program study area separate from the proposed project be delayed, and that only the proposed project be analyzed and reviewed to move forward. Changes to the Bass Lake Hills Specific Plan area in the program study area should be submitted as a separate project application, and studied on its own merits before modifying the Bass Lake Hills Specific Plan. The Hotels and cottages project is the project that contains the most detail and the most analysis, and rightfully should be the reviewed project.

## Chapter 4.9 - Noise

**Page 513**
**Chapter 4.9 – Noise**
**Page 4.9-28**
**Table 4.9-13**

**Predicted Traffic Noise Level Increases at Existing Sensitive Receptors – 2023 Existing vs. 2023 Existing Plus Project**

Does not include the Bass Lake Road, Barbary Way intersection in the measured intersections table.

**Page 544**
**Chapter 4.9 - Noise**
**Page 4.9-59**
**Table 4.9-44**

**Predicted Traffic Noise Level Increases at Existing Sensitive Receptors – 2040 Cumulative vs. 2040 Cumulative Plus Project**

Does not include the Bass Lake Road, Barbary Way intersection in the measured intersections table.

**Page 546**
**Chapter 4.9 - Noise**
**Page 4.9-61**

EDH APAC has significant concerns about noise generation through operation of the project. Event noises that carry uphill towards residences in the Bass Lake Hills Specific Plan and the adjacent Bar J Ranch community in Cameron Park were never contemplated in the Bass Lake Hills Specific Plan Environmental analysis.

Further, noise generation from the planned cabin residential element is immediately adjacent to existing RE5 and RE10 properties, as well as elements of the recent residential development in the Bass Lake Hills Specific Plan area. The density of the residential cabin element of the Town

& Country Village El Dorado proposal likewise, was not considered or studied in the Environmental analysis of the Bass Lake Hills Specific Plan.

EDH APAC recommends a continuous periodic noise monitoring program for outdoor events to ensure expected analyzed operational noise levels from events do not exceed the acceptable County Noise level standards.

**Table 4.9-45**
**Predicted Traffic Noise Level Increases at Existing Sensitive Receptors – 2040 Super Cumulative vs. 2040 Super Cumulative Plus Project**

Does not include the Bass Lake Road, Barbary Way intersection in the measured intersections table.

## Chapter 4.10 Public Services and Recreation

**Page 568**
**Page 4.10-20**

Discusses the closest Park(s) and recreational facilities. The DEIR mentions Christa McAuliffe Park, Dave West Park (CP CSD) and the Bass Lake Regional Park (EDH CSD) but fails to note the Laurel Oaks Park located east of Bass Lake Rd at 5031 Whistlers Bend Way, El Dorado Hills, CA.

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## Chapter 4.11 - Transportation

1. EDH APAC has significant concerns with roadway design elements of the existing Bass Lake Road - US50 interchange in the plan area. The westbound off-ramp features only a yield traffic control sign onto northbound Bass Lake Road, and is striped in a manner that generates significant confusion for drivers new to the area. The hospitality aspect of the proposed project suggests a significant increase in visitors new to the area. Residents of the Bass Lake area have learned to 'compensate' for the confusing road design. EDH APAC recommends that the Town and Country Village El Dorado project facilitate a restriping of the westbound US50 offramp onto northbound Bass Lake Rd as an immediate interim solution until the interchange is redesigned and improved. An additional interim improvement should be a full stop sign control for all turn movements of the westbound US50 off ramp at the Bass Lake Road interchange.


*Westbound Bass Lake Road-US50 Interchange offramp lane striping - merge arrows point to one lane that becomes two lanes, that becomes one lane.*

2. Additionally, no signage exists that indicates to northbound motorists on Bass Lake Road that the right lane at Bass Lake Rd and Country Club Drive is right turn only - even though the roadway is painted with turn arrows, when the lane is occupied by many vehicles, the painted arrows are not visible. Numerous residents have mentioned that northbound vehicles in the right turn lane on Bass Lake Rd continue through the intersection only to discover that Bass Lake Rd north of Country Club Dr is a single northbound lane.


*Northbound Bass Lake Rd approach to right turn lane at Country Club Drive - no turn signage*

3. EDH APAC has significant concerns about the design of the Bass Lake Road-US50 interchange. Exploring the Cumulative Analysis contained in the DEIR, with 4,000 additional residences proposed on the south side of US50 at Bass Lake Rd, and the increased vehicle traffic resulting from the proposed Project Area, the two-lane capacity (an LOS function of the El  Dorado County General Plan Transportation Element) under the US50 overpass of Bass Lake Rd is likely to become a bottleneck.


*Bass Lake Road/Marble Valley Road US50 2-lane underpass - north view*


*Bass Lake Road/Marble Valley Road US50 2-lane underpass - south view*

Further, sightlines are poor for the westbound US50 Bass Lake Rd off ramp for both

south and northbound traffic onto Bass Lake Rd. The westbound US50 Bass Lake Road offramp to northbound Bass Lake Rd is controlled by a YIELD sign. EDH APAC recommends that this be reconfigured to a full STOP sign controlled intersection for the westbound US50 Bass Lake Road offramp to northbound Bass Lake Road.

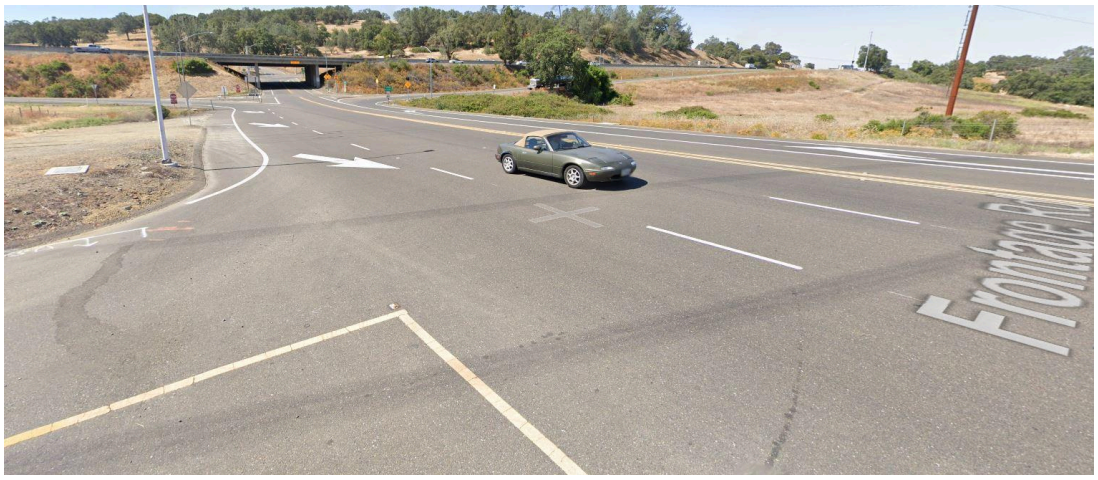

*Westbound US50 Bass Lake Road off ramp with impeded visibility to the south*

4. EDH APAC has significant concerns about the right-in and right-out project access points along Bass Lake Road. El Dorado County expended significant resources in funding, analysis, and design time to realign the Country Club Drive-Bass Lake Road intersection, with the new alignment moved 1600 feet to the north. The previous intersection was one of the poorest performing intersections in unincorporated El Dorado County, and CalTrans indicated a need to move the intersection away from the Bass Lake Rd-US50 interchange. Placing two new driveways 700 and 900 feet away from the interchange would seem to impact the Bass Lake Rd-US interchange in the same fashion as the old Country Club Drive alignment. EDH APAC would recommend three northbound lanes from US50 on Bass Lake Rd in front of the project site, with the right-most lane being reserved for access into and out of the Project site only. A four lane Bass Lake Road alignment will eventually be required, so some consideration should be made for Right of Way along Bass Lake Road in front of Project Site.

*Approximate project access driveways from Bass Lake Road with combined merge lane from US50 westbound off ramp and OLD Country Club Drive*

5. EDH APAC has significant concerns about the former Country Club Drive (FRONTAGE ROAD) design and function. EDH APAC recommends that the former Country Club Driver (FRONTAGE ROAD) be <u>restricted to RIGHT-IN and RIGHT-OUT turn movements ONLY.</u>


*Old Country Club Drive/Frontage Road westbound approach to Bass Lake Road*



*Old Country Club Drive/Frontage Road at Bass Lake Road view to south and offramp*

6. EDH APAC has significant concerns about the Program Study Area Trip Generation data. When additional projects are proposed as part of the Program Area, Trip Generation and overall Transportation elements will require extensive analysis and mitigation.

Chapter 4.11 - Transportation (continued)

**4-11 Project Development Area**
**Page 599**
**Page - 4.11-23**

***Conclusion (DEIR)***
*The residential component of the **Program Study Area** would generate VMT per resident above the unincorporated El Dorado County baseline average. Therefore, the proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and a significant impact could occur.*

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1. EDH APAC has significant concerns about the Program Study Area exceeding VMT limits. There is no concrete development proposal for the Program Study Area, only suggestions of what “might be” considered.

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***Mitigation Measure(s) (DEIR)***

*Alternative modes of transportation are not available for the residential portion of the Program Study Area. Therefore, the following mitigation measure focuses on reducing the availability of automobiles to*

*discourage travel. According to CAPCOA, the Program Study Area would require a 13.83 percent reduction in VMT to facilitate a less-than-significant finding for VMT impacts under CEQA.*

*Because alternative modes are not available for the residential portion of the Program Study Area and the following mitigation measure is not anticipated to reduce per capita VMT by the required 13.83 percent, impacts would remain significant and unavoidable.*

***Project Development Area***
***None required.***

***PAGE 600***
***Program Study Area***

***4.11-3*** *The below measures shall be implemented as practicable, to the satisfaction of the El Dorado County Engineer. VMT mitigation is based on guidance from the California Air Pollution Officers Association (CAPCOA).*

***Unbundling of Parking Costs from Rent***

*Unbundling, or separating, a residential project's parking costs from property costs shall require those who wish to purchase parking spaces to do so at an additional cost. On the assumption that parking costs are passed through to the vehicle owners/drivers using the parking spaces, unbundling would result in decreased vehicle ownership, and thus, a reduction in VMT and GHG emissions. Unbundling may not be available to all residential developments, depending on funding sources. Unbundling would reduce parking demand by up to 15.7 percent under ideal conditions, based on an upper limit of $300 per month per parking space. Benefits are proportional to the fee; for example, a $150/month fee would provide half the benefit of a $300/month fee.*

***Reduced Parking Supply***

*Reducing the total parking supply available at a residential project or site would create scarcity and add additional time and inconvenience to trips made by private auto, thus disincentivizing driving as a mode of travel. Reducing the convenience of driving would result in a shift to other modes and decreased VMT, and thus, a reduction in GHG emissions and VMT. Evidence of the effects of reduced parking supply is strongest for residential developments. Such measures would reduce VMT by up to 13.7 percent if all on-site parking was eliminated, and by up to a prorated amount based on a lower level of implementation. Generally, El Dorado County requires one and a half to two parking spaces per multi-family unit; therefore, reducing the parking supply to one space per unit would reduce VMT by a maximum of 6.85 percent.*

***PAGE 601***
***Page 4.11 - 26***

***4.11-4*** *Substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Based on the analysis below, the impact would be less-than-significant.*

*The following discussion includes an analysis of the proposed project's potential to substantially increase hazards to vehicle safety for both the Project Development Area and the Project Buildout.*

***Project Development Area and Project Buildout***

*As discussed above, the TIS included an analysis of collision history along the project area roadways. Pursuant to the TIS, the most collision-prone area within the vicinity of the project site is the portion of Bass Lake Road located between the US 50 eastbound offramp and Country Club Drive. However, the overall collision rate for Bass Lake Road between the US 50 eastbound ramps and Country Club Drive is 0.80 collisions per million VMT, which is well below the statewide average of 1.03 collisions per million VMT. In addition, as part of the Project Development Area improvements, the project would widen a portion of Bass Lake Road from two lanes to four lanes (two in each direction) from US 50 to just north of Country Club Drive. The widening project is currently in the County's CIP and identified as CIP 36105054.*

*The proposed project would not include any new sharp curves or dangerous intersections, and would not be located in the vicinity of any such roadway features. As discussed further in Chapter 3, Project Description, of this EIR, vehicle access to the project site would be provided by private roads connecting to Bass Lake Road to the west and to Country Club Drive to the north. Bass Lake Road would provide primary access to the Project Development Area south of Country Club Drive, containing the proposed hotels, Event Center/Museum, and restaurants. Primary access to the proposed cottages and secondary access to the proposed hotel would be provided from Country Club Drive. At the time that future development proceeds within the Program Study Area, a new roadway would be constructed and would connect the two portions of the project site. The new roadway would be comprised of a 45-foot right-of-way including two 14-foot travel lanes, and would include a roundabout in the Program Study Area to enhance traffic safety.*

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***Conclusion***

*Based on the above, the proposed project would not substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and a less-than-significant impact would occur.*

***Mitigation Measure(s)***

***None required.***

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2. EDH APAC has significant concerns about these potential proposed mitigation measures for the Program Study Area - the El Dorado Hills Community, and El Dorado County on a larger level, have never implemented public transit in a meaningful, successful manner. Facilities and transportation options simply do not exist to serve our El Dorado Hills Community in a fashion that would leverage "less parking". To suggest these as viable mitigation measures is wish-casting, and ignores any actual achievable mitigation. Our community has been designed since 1962 as a car-focused transit community.

## Additional Traffic Infrastructure Questions

- **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, and the proposed project driveways/access points.
- **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 Bass Lake Road, the Old Country Club Drive/Frontage Road, and Country Club Drive, as well as the impacts of project mitigations and capacity improvements on numerous Bass Lake Road and Country Club Drive 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?

## 4.13 Utilities and Service Systems

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***From DEIR***
***Page 625***
***Page 4.13-1***
***4.13.2 Existing Environmental Setting***
*Section - Water Supply and Delivery Infrastructure.*
*Seeks annexation into the EID Service Area for water and sewer.*

***Page 655***
***Page 4.13-31***
***4.13-2 Have sufficient water supplies*** *available to serve the project and reasonably foreseeable future development during normal, single dry, and multiple dry years. Based on the analysis below, the impact is less than significant*

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### 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 three 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/] 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 section of Mr. Dunn's analysis in his Water Supply Demand Analysis, Mr Dunn indicates:

> *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.***

Mr. Dunn's initial analysis focused on the proposed Village of Marble Valley Specific Plan, and the Lime Rock Village Specific Plan - residents have expressed concerns about the available water supply in the El Dorado Hills area due to the recent increase in large development projects. We include Mr. Dunn's analysis here as a pointed question to the ability to supply water in the El Dorado Hills Area - not to the question of overall water rights and EID district wide supply, but specifically water supply in El Dorado Hills.

## Additional EDH APAC Questions on Water supply and water facilities

1. **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?
2. **Wastewater System Analysis:**
    - What is the optimal location for a force main, and what are the associated costs?
3. **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?

**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.
- **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 any detention 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?
    - 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?

## Chapter 4.14 Wildfire

**Page 672**
**Page 4.14-7**
**El Dorado Hills Fire Department**

The EIR discusses the EDH Fire Department Station 86 located at 3670 Bass Lake Road. EDH APAC would encourage further discussion of necessary Fire Apparatus required to wage a firefighting event in the proposed hotel structures, and whether Ladder Truck 85 located at Station 85, 1050 Wilson Blvd El Dorado Hills, CA has an adequate response time for a structure fire at the proposed hotel facilities, based on estimated response times from three travel routes (via US50 4.5 miles - 8 minutes, via Serrano Pkwy - 5.4 miles, 9 minutes, or Serrano Pkwy and Bass Lake Rd - 6.1 miles, 12 minutes).

## Chapter 5.3 Cumulative Impacts

EDH APAC appreciates the effort of the applicant and the DEIR authors to address the cumulative impacts of the proposed Project Area and Plan Study Area along with other adjacent proposed development projects. This Cumulative Impacts section of this DEIR exceeds cumulative impact analysis from several other recent DEIR for projects in the El Dorado Hills

area. Significant amounts of development projects adjacent to the applicants' proposed Town and Country Village El Dorado project have substantial bearing on the cumulative aspects and impacts in El Dorado Hills.

EDH APAC believes that a cumulative analysis is necessary, and that mitigation and infrastructure capacity improvements **should be proportionally shared based on the degree of impact(s) across all of the proposed development projects**.

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An area resident that chooses to remain anonymous has provided these comments and concerns to be included in EDH APAC's DEIR review document.

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This is evidence of a prematurely submitted document. What is the project being analyzed? Maybe options A-B-C? Maybe B, D, E and F instead? Maybe X-Y and a set of undefined new items dreamed up on the fly, not included in the current dream possibilities listed and described by spokesperson Pane? It looks like the project proponent is hoping to appeal to all audiences—equestrians, bike riders, shoppers, wine drinkers, and many, many more, hoping you can appeal to everyone in some way to get approval.

With no defined project, this is not the time to move ahead—decide what the project is, then analyze impacts of those As, Bs Cs and so on together and alternatives. Equestrian trails may not work with biking. You need to finish the project definition first. Go back to the beginning and make some decisions. This seems like it is eternally changeable—worker housing becomes saleable cottages or part of the motel complex. A worker is fired and does not want to move for six months to allow their child to continue at the local school—where does the replacement live? No one will have a say without hammering out details now. The cottages remain a vagary.

I cannot find any definition of what the promised museum/meeting room might involve. A museum is not a display of unconnected and unrelated objects someone likes or wants to show off in glass cases, reminding one of a 19th century cabinet of curiosities. A true museum involves professional scholars and designers developing the theme, context, signage and artifact selection. How about information on how this will be developed, funded, managed, and updated as needed? What if the complex is sold? Who owns the artifacts?

The cultural resource section is still not completed—Josh Pane said at the 9-4-2024 APAC meeting that the person in charge of that was going out in the field on Thursday to do some additional fieldwork. Or will we have to believe he just misspoke and all resources are correctly identified, recorded, and evaluated for their significance under the appropriate criteria? The road names are not correct, and your maps at presentations seem to have changed several times, with now something called the "Old Clarksville Toll Road" --never a name in use for any roadway in the region. Will this change again with some archival research?

Many sections are unclear trying to deal with an undefined project.  The hotel and other facilities need to be chosen and to be defined as a set plan, allowing other modifications. Then several groups of the team need to rewrite their sections, and identify impacts to the selected overall plan.

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EDH APAC has benefited from numerous discussion opportunities with the Town & Country Village El Dorado applicants.The applicants have exceeded any other proposed project in terms of outreach and seeking feedback. The applicants have held presentations at the following EDH APAC meetings:

January 13 2021

April 14 2021

August 11 2021

January 12 2022

February 8 2023

July 18 2023 (SCOPING MEETING ANNOUNCEMENT ONLY)

August 9 2023

September 4, 2024

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 Town and Country Village El Dorado Subcommittee.**

El Dorado Hills Area Planning Advisory Committee
*“Non-Partisan Volunteers Planning Our Future Since 1981”*