Appendix A

NOP and Scoping Comments

NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: November 6, 2020

To: Agencies and Interested Parties

From: Gina Hamilton, Planning Division, County of El Dorado

Subject: **Notice of Preparation of a Draft Environmental Impact Report for the Creekside Village Specific Plan Project (Application Nos. General Plan Amendment GPA20-0001, Rezone Z20-0005, Specific Plan SP20-0001, Tentative Map TM20-0002)**

Review Period: November 6, 2020 to December 7, 2020

County of El Dorado will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed Creekside Village Specific Plan (proposed project) located in unincorporated El Dorado County (County). This Notice of Preparation (NOP) initiates the environmental scoping process in accordance with the California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR] Section 15082). The purpose of an NOP is to provide sufficient information about the proposed project and its potential environmental effects to allow public agencies, organizations, tribes and interested members of the public the opportunity to provide a meaningful response related to the scope and content of the EIR, including feasible mitigation measures and project alternatives that should be considered in the EIR (CEQA Guidelines, 14 CCR 15082[b]). The proposed project and location are briefly described below.

PROVIDING COMMENTS

El Dorado County is soliciting written comments from public agencies, organizations, and individuals regarding the scope and content of the environmental document. Because of time limits mandated by State law, comments should be provided no later than 5:00 PM on Monday, December 7, 2020. Please send all comments to:

Gina Hamilton, Senior Planner
County of El Dorado Planning Division
2850 Fairlane Court
Placerville, CA 95667
Email: creeksidevillagesp.edcgov.us

Agencies that will need to use the EIR when considering permits or other approvals for the proposed project should provide the name of a contact person, phone number, and email address in their comment. Comments provided by email should include "Creekside Village NOP Comment" in the subject line, and the name and physical address of the commenter in the body of the email.

PROJECT LOCATION

The project site is located south of Highway 50, west of Latrobe Road and south of Investment Boulevard in the El Dorado Hills area (APN 117-010-012), see Figure 1. The project site is bordered on the north by the existing El Dorado Hills Business Park and the John Adams Academy Charter School, to the east by the Blackstone master planned community (Valley View Specific Plan), to the south by undeveloped rural

residential and industrial lands, and to the west by undeveloped land in the Carson Creek Specific Plan zoned for research and development.

PROJECT DESCRIPTION

The project applicant proposes to develop a new 926-unit residential community located on an approximately 208-acre site. The project would include 115.9 acres of single-family low-density residential development, 21.0 acres of single-family medium-density residential development, 14.3 acres of parks, 46.3 acres of open space preserves and buffers, and 10.4 acres of roadways. The proposed land use map is provided in Figure 2. The current zoning and General Plan land use designation for the project site is Research & Development (R&D). The project would require a general plan amendment from R&D to AP - Adopted Plan and a rezone from R&D to SP - Creekside Village Specific Plan and establish a Specific Plan for Creekside Village. The project's Draft Tentative Map is shown in Figure 3

The Creekside Village Specific Plan includes a single-family low-density residential land use designation that would include single-family residential, accessory dwelling units (ADUs), and junior ADUs[1] as well as neighborhood and community serving amenities such as parks, community clubhouses, and emergency services facilities. Low-density development would range from 4 to 8 dwelling units per gross acre, with a target dwelling unit count of 676. The single-family medium-density residential land use designation would allow for single-family dwellings, and two- and three-family dwellings as well as parks and public facilities. As shown in Figure 3, the draft Tentative Map includes two parcels designated for future development of medium-density residential that would range from 8 to 12 dwelling units per gross acre with a target dwelling unit count of 250. Three parks are proposed: an 8.8-acre village park in the northeast area along Latrobe Road, a 3.3-acre neighborhood park in the south central area of the site, and a third 2.2-acre park located in the southeast corner of the site. The proposed Open Space Preserve designation would protect intermittent drainages, seasonal wetlands, vernal pools, and ponds extending from the west to the northeast part of the project site. An Open Space buffer would be located along the western, northern, and southern borders of the site, as well as along Royal Oaks Drive.

The proposed project includes amendments to the El Dorado County General Plan, adoption and implementation of the Creekside Village Specific Plan, and rezoning. In addition, the project may require the County's approval of a development agreement, financing plan, and subsequent development permits and entitlements including a Development Permit and Tentative Maps.

The proposed project also includes a request to annex into the El Dorado Hills Community Services District as part of a separate service district annexation request. The El Dorado Local Agency Formation Commission (LAFCO) is the agency with statutory responsibility for such boundary changes and it is expected that the EIR will address LAFCO's needs for environmental evaluation and disclosure under CEQA.

It is anticipated that additional State and federal actions will be required for implementation of the proposed project, including: a Clean Water Act (CWA) 401 Cerftication (Regional Water Quality Control Board – Central Valley Region), a CWA Section 404 permit (U.S. Army Corps of Engineers); an Incidental Take Authorization through a Section 7 Consultation (U.S. Fish and Wildlife Serivice and U.S. Army Corps of Engineers), a California Department of Fish and Wildlife (CDFW) 1602 Streambead Alteration Agreement, and a CDFW 2081 Incidental Take Permit.

POTENTIAL ENVIRONMENTAL IMPACTS

Pursuant to the CEQA Guidelines, 14 CCR 15063, the County is preparing an EIR to determine if the proposed project may have a significant effect on the environment. The purpose of the EIR is to provide the public with information on environmental effects that would result from project construction and operation. The County anticipates that the EIR will address the following topic areas:

[1] A junior ADU is defined as a unit that is no more than 500 square feet in size and contained entirely within a single-family residence. A junior ADU may include a separate bathroom, or may share bathroom facilities with the existing structure (California Government Code Section 65852.22).

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Public Utilities
- Transportation
- Wildfire

Based on a preliminary analysis, the County has determined that impacts to the following topics would not be significant. Therefore, these topics will not be analyzed further in the EIR.

- Agricultural Resources and Forestry Resources
- Hazards and Hazardous Materials
- Mineral Resources

Full documentation of the factual basis for this determination will provided in the EIR. Unless specific comments are received during the NOP public comment period that indicates a potential for the project to result in significant impacts, these topics will not be analyzed further in the EIR.

SCOPING MEETING

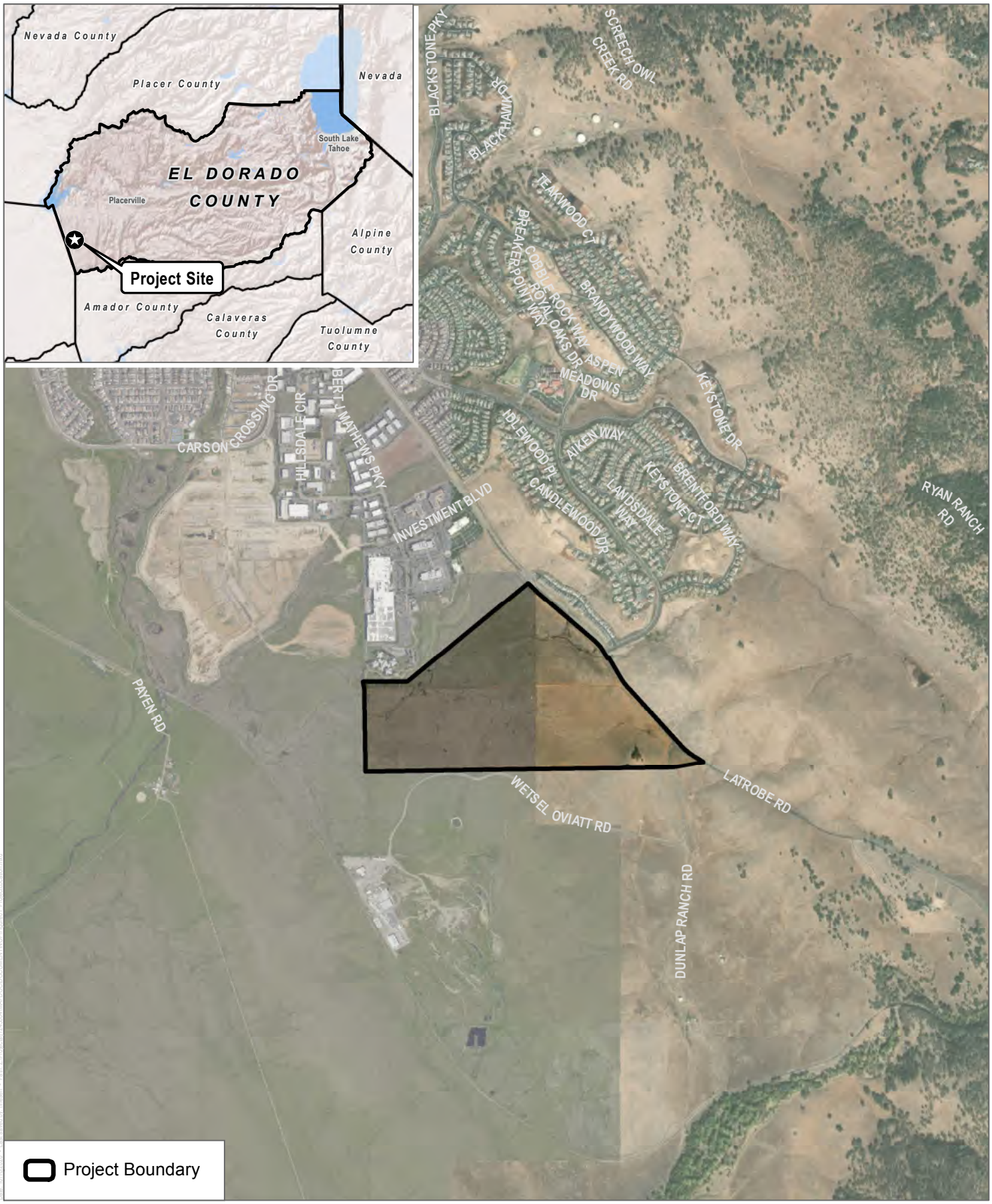
El Dorado County will hold a scoping meeting to receive verbal comments regarding the scope and content of the environmental document and answer general questions regarding the environmental process. Due to COVID-19 social distance requirements, the scoping meeting will be held remotely. The meeting will be on **Thursday, November 19, 2020 from 6:00 to 7:00 PM**.

Attendees can observe and participate via live stream of the scoping meeting by going to this website: https://rebrand.ly/CreeksideVillageScoping

Attendees can also participate and join by phone: 1-669-900-6833 or 1-929-205-6099
Webinar ID 924 1489 7860

By participating in this meeting you acknowledge that you are being recorded. While speaking, please reduce any background noise to ensure that your comments can be heard. For those joining via live stream: once public comment is open, if you wish to comment, press the "raise a hand" button. For those joining via phone: once public comment open, if you wish to comment, press *9 to indicate a desire to make a comment. You will be called by the last three digits of your phone number when it is your turn to comment.

The County of El Dorado is committed to ensuring that persons with disabilities are provided the resources to participate in its public meetings. If you require accommodation, please contact Planning Services at 530-621-5355 or via e-mail, planning@edcgov.us.



SOURCE: ESRI 2020

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Creekside Village Specific Plan NOP

FIGURE 2

Land Use

Creekside Village Specific Plan NOP

DUDEK

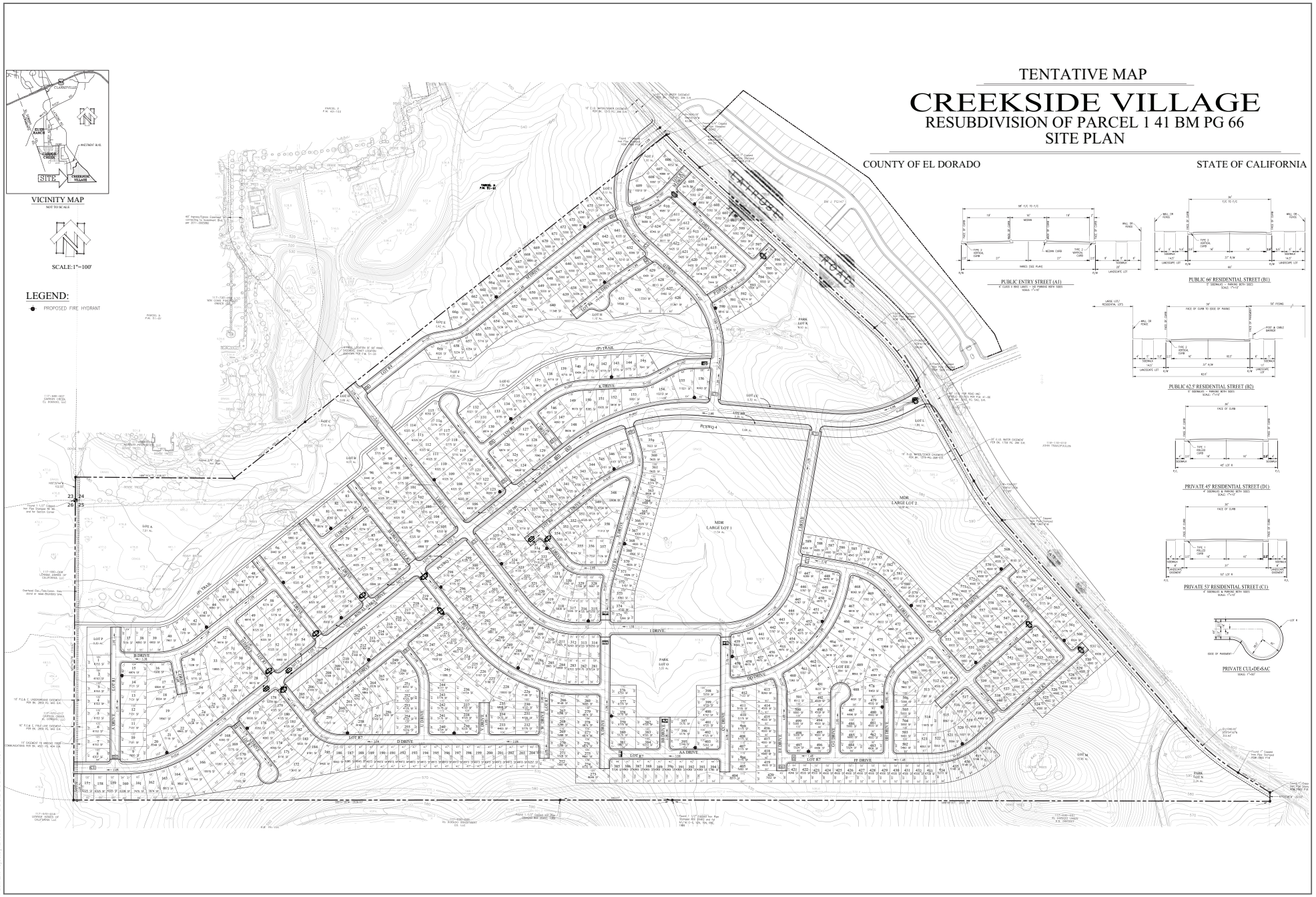


FIGURE 3

Draft Tentative Map

Creekside Village Specific Plan NOP

DUDEK

Jared Blumenfeld
Secretary for
Environmental Protection

Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

November 6, 2020

Ms. Gina Hamilton
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667
creeksidevillagesp@edcgov.us

CREEKSIDE VILLAGE SPECIFIC PLAN EIR – DATED NOVEMBER 2020 (STATE CLEARINGHOUSE NUMBER: 2020110052)

Ms. Hamilton:

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation of an Environmental Impact Report (EIR) for the Creekside Village Specific Plan (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the EIR. Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline

contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.

3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf).

4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).

5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to *DTSC's 2001 Information Advisory Clean Imported Fill Material* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).

6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf).

DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp-

content/uploads/sites/31/2018/09/VCP_App-1460.doc. Additional information regarding voluntary agreements with DTSC can be found at: https://dtsc.ca.gov/brownfields/.

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

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November 4, 2020

2020 NOV 10 AM 11:25
RECEIVED
PLANNING DEPARTMENT

Gina Hamilton
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667

Re: 2020110052, Creekside Village Specific Plan EIR Project, El Dorado County

Dear Ms. Hamilton:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

EL DORADO LAFCO

LOCAL AGENCY FORMATION COMMISSION

550 Main Street Suite E • Placerville, CA 95667

(530) 295-2707 • lafco@edlafco.us • www.edlafco.us

December 7, 2020

Gina Hamilton
Project Planner
El Dorado County Planning Services
2850 Fairlane Court
Placerville, CA 95667

RE: Notice of Preparation of a Draft Environmental Impact Report for the Creekside Village Specific Plan (General Plan Amendment GPA20-0001, Specific Plan SP20-0001, Rezone Z20-0005, Tentative Map TM20-0002)

Dear Ms. Hamilton:

Thank you for the opportunity to review and provide comments on the Notice of Preparation of a Draft Environmental Impact Report for the Creekside Village Specific Plan. LAFCO's comments for this proposed project are essentially the same as the comments previously submitted to El Dorado County Planning on May 6, 2019 and on October 27, 2020.

As you are aware, APN 117-010-012 is not within the boundaries of the El Dorado Hills Community Services District (EDHCSD); however, the parcel is within EDHCSD's sphere of influence. The proposed project will require LAFCO approval for annexation into EDHCSD prior to receiving park and recreation and/or other services from the District. **Thank you for including annexation into the EDHCSD as part of the project description and analysis within the Draft EIR. In addition, LAFCO respectfully requests that the Draft EIR address the following potential issues:**

Park and Recreation Services: The Draft EIR should address issues associated with the provision of park and recreation services; specifically, the impacts that the proposed planned development would have on existing EDHCSD facilities and the financial implications to the District, as well as other residents of the District. The Draft EIR should include a discussion of existing recreational facilities and services provided by the EDHCSD, including the capacity and location, along with a discussion of any new facilities that will be necessary to serve future residents of the proposed development.

Other Service Impacts: The Draft EIR should also discuss the proposed development's impact on other local service providers, such as fire and emergency services, and water and wastewater services. The Draft EIR should contain a robust discussion on the mitigation measures to minimize any identified impact, including impacts on existing facilities and financial implications to the service providers.

COMMISSIONERS
Public Member: Michael Powell • Alternate Public Member: Dyana Anderly
City Members: Mark Acuna, Cody Bass • Alternate City Member: Kara Taylor
County Members: Shiva Frentzen, John Hidahl • Alternate County Member: Brian Veerkamp
Special District Members: Holly Morrison, Tim Palmer • Alternate Special District Member: Michael Saunders
STAFF
José C. Henríquez, Executive Officer • Erica Sanchez, Assistant Executive Officer
Malathy Subramanian, Commission Counsel

Cumulative Impacts: The Draft EIR needs to consider potential cumulative impacts based on a range of recent, probable and reasonably foreseeable projects, including land use projects recently approved by the County and pending projects slated to move forward.

Regional Housing Needs Assessment Goals: The Draft EIR should identify the income category housing that the proposed development will provide and how that fits into the County's RHNA target goals for housing allocations.

Once again, thank you for giving LAFCO the opportunity to comment on the preparation of the Draft EIR. We look forward to reviewing the Draft EIR once it is prepared and circulated, so that we may have a chance to provide additional comments before the final document is adopted.

If you have any questions, I can be contacted at (530) 295-2707.

Sincerely,

Erica Sanchez
LAFCO Assistant Executive Officer

From: **Natalie Miller** <nmiller@latrobeschool.com>
Date: Wed, Nov 18, 2020 at 1:15 PM
Subject: Re: NOP info for Creekside Village SP (GPA20-0001)
To: Gina Hamilton <gina.hamilton@edcgov.us>

Hi Gina,

Please go ahead and submit those scoping comments for me. Thank you for your help.

Natalie Miller
Superintendent/Principal
Latrobe School District
7900 S. Shingle Road
Shingle Springs, CA 95682
530.677.0260

On Wed, Nov 18, 2020 at 11:13 AM Gina Hamilton <gina.hamilton@edcgov.us> wrote:
Natalie,

Please confirm receipt of this email, just so I know that you've received it.

Thank you for providing an NOP scoping comment for Creekside Village Specific Plan. I have recorded your concerns about the potential increase in students for the Latrobe School District as well as your request for the applicant to include the District in their outreach efforts. Additionally, I have recorded your request to receive notifications of meetings, hearings, etc. in the project folder.

For your information and reference, below is the weblink to the Notice of Preparation (NOP) for the preparation of the Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan in El Dorado Hills. This NOP is the official kick-off of the EIR process for the project subject to a 30-day public review and comment period beginning today (November 6th) and ending on December 7th. A formal virtual scoping meeting to obtain comments is scheduled on Thursday, November 19th. Information about the scoping meeting is included in the NOP.

https://www.edcgov.us/Government/planning/public%20notices/Documents/2020/20201106_CreeksideVillageSP_NOP.pdf

Also, as we discussed on the phone, you can access project application materials via the County's online Trakit system available here: https://edc-trk.aspgov.com/etrakit/. On the main page, in the Projects box, click Search. On the next page, in the drop down menu next to Search By, choose project number, and search by GPA20-0001. Click on the project that comes up (there should only be one) and that will take you to a page with links to application materials at the bottom.

Please feel free to call or email me if you have any additional questions.

Best regards,

Gina Hamilton
Senior Planner

County of El Dorado
Planning and Building Department
2850 Fairlane Court, Bldg C
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Main Line (530) 621-5355
Direct Line (530) 621-5980
Fax (530) 642-0508
gina.hamilton@edcgov.us

11 December 2020

Gina Hamilton
County of El Dorado
Planning and Building Department
2850 Fairlane Court
Placerville, CA 95667

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CREEKSIDE VILLAGE SPECIFIC PLAN PROJECT (GENERAL PLAN AMENDMENT GPA20-0001, REZONE Z20-0005, SPECIFIC PLAN SP20-0001, TENTATIVE MAP TM20-0002), SCH#2020110052, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 3 November 2020 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Creekside Village Specific Plan Project (General Plan Amendment GPA20-0001, Rezone Z20-0005, Specific Plan SP20-0001, Tentative Map TM20-0002), located in El Dorado County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin

Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention

Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State
If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit
If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4709 or Greg.Hendricks@waterboards.ca.gov.

Greg Hendricks
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

---------- Forwarded message ---------
From: **Bonni Bergstrom** <bzbergstrom@me.com>
Date: Tue, Dec 1, 2020 at 4:28 PM
Subject: Comment from a Blackstone resident regarding proposed Creekside Villages
To: <gina.hamilton@edcgov.us>

Dear Ms. Hamilton,

As Blacksone residents we wish to register our concern regarding the proposed Creekside Villages development off Latrobe.
1. The current zoning is appropriate for light commercial and R&D utilization. By contrast, the proposed change for 926-unit residential land use represents is a dramatic change. Many homeowners in the Blackstone and Heritage communities purchased their property on the basis of the current low-density non-residential zoning of adjacent lands.
2. The draft EIR should include the impact of other proposed residential, transportation and retail developments. To consider the Creekside Village proposal as a discrete development would ignore the broader environmental issues resulting from multiple revised land use plans.
3. The traffic impact on Latrope can be easily measured and needs to be reflected in the EIR. Additionally, the EIR needs to include the significant pressure that will be exerted on feeder roads. The EIR should include but is not limited to Carson Crossing Road, Golden Foothills loop, White Rocks, Investment, and Blackstone.
4. The draft EIR should consider the impacts of the proposed development on existing infrastructures and adjacent Community Finance Districts. The Heritage and Blackstone communities currently pay heavy Mello-Roos Special Taxes for community infrastructures. Any impact or utilization of those infrastructures should be evaluated and off-sets need to be established.
5. Given the certified ballot initiative to repeal the CSD LLAD #39 special tax (Heritage Village Park), the use of the LLAD funding to finance future park operations for Creekside Village parks should be called into question. If voters approve the initiative, the invalidity of this financing mechanism in other jurisdictions is possible.
6. The three County Traffic Commission's alternative plans for the area should be factored into the proposed Creekside Village development. The Commission's plans did not take into account the proposed residential development. Additionally, since the closest regular elementary school is Brooks Elementary traffic travel on Latrobe and El Dorado Hills Blvd. will be impacted by parents transporting children twice each day.

Thank you,
Bonni Bergstrom and
James Bergstrom
1-925-890-0702

Sent from my iPhone

---------- Forwarded message ---------
From: **Bonni Bergstrom** <bzbergstrom@comcast.net>
Date: Thu, Dec 3, 2020 at 1:20 PM
Subject: RE: Carson Creek Village development concerns--should say: CREEKSIDE VILLAGES
To: <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>, <clay.russell@edcgov.us>
Cc: <gina.hamilton@edcgov.us>

Sorry, this email was to be in reference to CREEKSIDE VILLAGES not the Carson Creek Village in preliminary authorization phase.

From: Bonni Bergstrom <bzbergstrom@comcast.net>
Sent: Thursday, December 3, 2020 1:01 PM
To: 'bosone@edcgov.us' <bosone@edcgov.us>; 'bostwo@edcgov.us' <bostwo@edcgov.us>; 'bosthree@edcgov.us' <bosthree@edcgov.us>; 'bosfour@edcgov.us' <bosfour@edcgov.us>; 'bosfive@edcgov.us' <bosfive@edcgov.us>; 'clay.russell@edcgov.us' <clay.russell@edcgov.us>
Cc: 'gina.hamilton@edcgov.us' <gina.hamilton@edcgov.us>
Subject: Carson Creek Village development concerns
Importance: High

Sirs and Madam,

As Blackstone residents we wish to register our concern regarding the proposed Carson Creek Villages development off Latrobe.

1. The current zoning is appropriate for light commercial and R&D utilization. By contrast, the proposed change for 926-unit residential land use represents is a **dramatic change**. Homeowners in the Blackstone and Heritage communities purchased their property on the basis of the current low-density non-residential zoning of adjacent lands.

2. Piece-meal changes to the El Dorado Hills Master Development Plan is not an efficient nor wise method to change and development in our community.
3. The draft EIR should include the impact of other proposed residential, transportation and retail developments. To consider the Creekside Village proposal as a discrete development would ignore the broader environmental issues resulting from multiple revised land use plans.
4. The traffic impact on Latrobe can be easily measured and needs to be reflected in the EIR. Additionally, the EIR needs to include the significant pressure that will be exerted on feeder roads. The EIR should include but is not limited to Carson Crossing Road, Golden Foothills loop, White Rocks, Investment, and Blackstone.
5. The draft EIR should consider the impacts of the proposed development on existing infrastructures and adjacent Community Finance Districts. The Heritage and Blackstone communities currently pay heavy Mello-Roos Special Taxes for community infrastructures. Any impact or utilization of those infrastructures should be evaluated and off-sets need to be established.
6. Given the certified ballot initiative to repeal the CSD LLAD #39 special tax (Heritage Village Park), the use of the LLAD funding to finance future park operations for Creekside Village parks should be called into question. If voters approve the initiative, the invalidity of this financing mechanism in other jurisdictions is possible.
7. The three County Traffic Commission's alternative plans for the area should be factored into the

proposed Creekside Village development. The Commission's plans did not take into account the proposed residential development. Additionally, since the closest regular elementary school is Brooks Elementary traffic travel on Latrobe and El Dorado Hills Blvd. will be impacted by parents transporting children twice each day.

Thank you,
Bonni Bergstrom and
James Bergstrom
1-925-890-0702

---------- Forwarded message ---------
From: **Bob.Hendricks@zoho.com** <bob.hendricks@zoho.com>
Date: Mon, Dec 7, 2020 at 4:11 PM
Subject: Comments pertaining to Creekside Villages EIR
To: <gina.hamilton@edcgov.us>

Ms. Hamilton

I am a homeowner in the Blackstone community and also serve as the President of the Blackstone Homeowners Association. This email pertains to my opposition to the proposed Creekside Village development. Additionally, I also represent 1,750 residents who have signed a petition opposing the Creekside Villages project. The reason for our opposing this development are primarily as follows:

1. This project would rezone Business Park land from commercial and R&D to residential. Many homeowners in our community purchased their property on the basis of the current low density non-residential zoning, in anticipation of commercial development..

2. The draft EIR must consider the impacts of the proposed residential development, along with the proposed Carson Creek Village development, and the significant impacts to traffic on Latrobe and Fwy 50. The developers claim that they believe a significant number of new residents will work within the Business Park, but there simply are not any jobs available in the business park. This is the same argument being used by the Carson Creek Village development. Combined, these two developments would create between 3,000-5,000 new residents, the majority of which would likely be commuter residents that drive into Sacramento, further clogging our already congested roads. Additionally, this will increase the amount of traffic on feeder roads, such as White Rock Rd, which parallels the Folsom Ranch development of 10,000 homes!

3. The significant increase in residences between Creekside Villages and Carson Creek Village will strain all of our local elementary schools. Many Blackstone residents children are scattered between Brooks, Oak Meadow, and Valley View elementary schools.

The petition was previously provided to the Board of Supervisors, but has since had more than 1,000 additional signatures, with the current number of El Dorado Hills residents who have signed the petition at 1,750 as of this date.

I will be providing the signatures to this petition to all members of the Board of Supervisors and the El Dorado County Chief Administrative Officer (CAO).

Please confirm receipt of this email so that I may be ensured that my comments have been included with the EIR.

Regards,

Bob Hendricks

El Dorado Hills Resident

---------- Forwarded message ---------
From: **Bill Mayer** <billfishboy@gmail.com>
Date: Thu, Dec 3, 2020 at 4:10 PM
Subject: [CreeksideVillageSP] Notice of Preparation Response to Creekside Village Specific Plan EIR
To: <creeksidevillagesp@edcgov.us>

Dear Ms. Hamilton:
The proposed project is seeking a General Plan Amendment and rezone from Research and Development to a Adopted Plan and Specific Plan allowing for up to 926 residential units.The current land use designation would accommodate research and development type uses consistent with the El Dorado Hills Business Park. With the change in land use, these business park uses would no longer be planned.

In the not too distant past, the County of El Dorado meticulously prepared a Comprehensive General Plan with substantial public involvement and review that established a blueprint for the long range planning objectives of the County and local communities, including El Dorado Hills. Land uses that were ultimately determined went through detailed analysis to ensure that all elements of the General Plan were compatible with one another and comprehensive as needed to achieve a specific land use balance tailored to local, community and regional goals. Land use changes subsequent to the adoption of the General Plan change the land use balance mutually agreed to by the community and it's many constituents. Such changes have a ripple effect throughout the General Plan altering the well thought out, comprehensive nature of the General Plan process. Everything changes, and the core goals and objectives brought out by both the community participation and County Administration processes are potentially upended.

It is incumbent upon the County and their environmental consultant to exhaustively study these changes in land use and the consequential ripple effect through the comprehensive plan and it's elements to determine project effects. The land use changes must be reviewed by examining the loss of business park uses, including the loss of tax base and indirect economic consequences. Conversely, the analysis should also examine the addition of the property tax base created by the Specific Plan uses to determine the effect on County revenues. An analysis should be conducted on the need for additional residential uses in contrast to the loss of business park uses. Is there sufficient demand for residential uses? Did the demand for business park uses, in the long term General Plan horizon, sufficiently decline such as to justify the change.

How will these land use changes affect the following:
- Traffic: Changes to peak hour and daily traffic conditions and the resultant effect on roadway and intersection capacity. Will the levels of service increase or decrease on the surrounding local and regional roads and highways? Is there sufficient rights-of-way available to mitigate potentially significant impacts?
- Air Quality: Changes to carbon monoxide levels along local roadways will occur, particularly affecting the health of more sensitive senior adults that reside in this part of the County. Will the overall air quality levels exceed State and federal standards as a result of the land use change. Will the change from employment generating uses to non-employment uses adversely impact the County and State air quality goals identified in adopted regional air quality plans?
- Noise: Changes in land use trigger increases or decreases in traffic, and thus noise levels along roadways. Will County noise standards be exceeded? Will sound barriers be required? Is

there sufficient right-of-way available to mitigate noise exceedances? Will noise barriers have a negative visual impact on adjacent neighbors and land uses?
- Population/Jobs/Housing: How will the increase in population from residential uses affect the jobs to housing ratio established for local and regional planning?
- Public Services: How will the land use changes impact county services, including public works demand and infrastructure maintenance, demand for parks and recreation services, school capacity and school facilities? How will law enforcement and fire protection services be affected with the increase in residential population, as offset by the decrease in business park uses?
- Water/Wastewater: The demand for potable water supply should be examined in light of current allocations and long term need given available infrastructure and supply. Existing wastewater services provided by EID treatment plants and conveyance infrastructure must be evaluated to determine the agency's ability to serve. Sewerage system capacity should be evaluated to determine expansion needs and space requirements.
- Climate Change: Land use changes will alter the equivalent carbon levels potentially increasing or decreasing carbon emissions in the atmosphere. Climate change (warming) may be incrementally and adversely affecting global temperatures, contributing to an increase in wildfires, a decrease in snowpack, and an increase in flooding. These potential effects must be studied.

Thank you for the opportunity to comment on the NOP.
Bill Mayer

---------- Forwarded message ---------
From: **CHRISTOPHER BEACH** <chrisbeach55@comcast.net>
Date: Wed, Dec 2, 2020 at 9:24 AM
Subject: [CreeksideVillageSP] Creekside Village NOP Comment
To: creeksidevillagesp@edcgov.us <creeksidevillagesp@edcgov.us>

You can add my voice to the others who are opposing the proposed project at Creekside Village. In no particular order, here are the reasons why:

The county is seeking to change the general plan and rezoning commercial property in the Business Park to residential. The current zoning is appropriate for light commercial and R&D utilization. By contrast, the proposed change (for 926-unit residential land use) is a drastic change. Many homeowners, including my wife and me, in the Blackstone and Heritage communities purchased their property on the basis of the current low-density, non-residential zoning of adjacent lands.

The proposal would have an adverse impact on our local elementary schools, which are beyond capacity now.

This additional construction will have obvious traffic implications; not just Latrobe, which will impact Blackstone Residents, but also neighboring communities that rely on White Rock Rd. and every community that will rely on an already overcrowded freeway commute. The traffic impact on Latrobe can be easily measured and needs to be reflected in the EIR. Additionally, the EIR needs to include the significant pressure that will be exerted on feeder roads. The EIR should include but is not limited to Carson Crossing Road, Golden Foothills loop, White Rock, Investment, and Blackstone.

The draft EIR should include the impact of other proposed residential, transportation and retail developments. To consider the Creekside Village proposal as a discrete development would ignore the broader environmental issues resulting from multiple revised land-use plans.

The draft EIR should consider the impacts of the proposed development on existing infrastructure and adjacent Community Finance Districts. The Heritage and Blackstone communities currently pay considerable Mello-Roos Special Taxes for community infrastructure. Any impact or utilization of such infrastructure should be evaluated and offsets should be established.

The various County Traffic Commission's alternative plans for the area should be factored into the proposed Creekside Village development. The Commission's plans did not take into account the proposed residential development.

To summarize: We strenuously object to the Creekside Village project as currently proposed.

Sincerely,

Christopher Beach
5477 Aspen Meadows Drive
El Dorado Hills, CA. 95762

---------- Forwarded message ---------
From: **Douglas Lash** <douglas.lash@gmail.com>
Date: Mon, Nov 30, 2020 at 3:18 PM
Subject: [CreeksideVillageSP] Creekside Village NOP Comment
To: <creeksidevillagesp@edcgov.us>

Hello,

I live in Blackstone and have a couple comments regarding the Creekside Village Development. My comments regard an increase in traffic and noise that would be generated by the new development.

Regarding traffic, I would like to see the roadway expanded to four lanes through and beyond the proposed intersection at Latrobe and Royal Oaks Drive. I live at 1023 Gemwood Way and the back fence of my property provides an excellent view of Latrobe where two lanes combine into one. Drivers tend to accelerate through the area at Clubhouse drive to get ahead of slower traffic. This has caused accidents in the past and I'm concerned that with the increased traffic those accidents will occur more frequently.

I am also concerned about the Latrobe Road and Larkstone Place intersection. It is difficult to enter Latrobe road at peak traffic hours as there is not enough roadway to reach 55 mph and enter safely onto Latrobe road from Larkestone Place. If the speed was dropped and the 'on ramp' lengthened it could help mitigate these issues. I'm not asking for a stop light as I think that would be overkill.

Traffic noise is already an issue for me and there is no form of noise barrier between my back yard and Latrobe Road. I am very concerned about the noise the additional traffic would generate.

Thank you for your time and consideration.

Best Regards,
Doug Lash
(707)293-3947

From: **Ginger Cockcroft** <ginger.croft@comcast.net>
Date: Fri, Nov 20, 2020 at 6:12 PM
Subject: [CreeksideVillageSP] Comment regarding proposed creek side village development
To: <creeksidevillagesp@edcgov.us>

Hello,

I listened to the scope meeting on the 19th for the above proposed development and read the document posted on the EDC web page. I noted that the document listed noise as one of the elements that is within the scope of the EIR, so I believe it is pertinent to inquire about the noise impact generated by increased traffic along major roads that border residential neighborhoods.

I live in a 15 year old development called Four Seasons which is accessed by White Rock Road and Carson Crossing. During the web meeting it was mentioned that Latrobe Road would be widened and have additional signals to handle the increased traffic. White Rock Road is commonly used by drivers coming from Latrobe to reach Folsom and bypass the bottleneck at highway 50 and Latrobe, and as a result, should be including when weighing in on traffic issues.

There is an aging brick wall between White Rock Road and Four Seasons that was built over 15 years ago. In some places this "wall" is only six feet high and has gaps in it. Many of us in Four Seasons believe this wall is inadequate to provide sound abatement with the increase in traffic coming the massive development of the business park, the proposed Carson Crossing off ramp from highway 50, and the connector to Silva Valley Parkway all the way to Elk Grove.

I am requesting that any development plans should include an engineering study to determine what structural changes need to be made to the wall on the south side of White Rock Road to ensure that noise pollution does not degrade our quality of life.

Regards,

Dan and Ginger Cockcroft

---------- Forwarded message ---------
From: **Jen A** <aldredj9@gmail.com>
Date: Thu, Dec 3, 2020 at 10:08 AM
Subject: [CreeksideVillageSP] Carson Creek Village opposal
To: <creeksidevillagesp@edcgov.us>

I **adamantly oppose** the rezoning of commercial land to residential for Carson Creek Village.

1. The current zoning is appropriate for light commercial and R&D utilization. By contrast, the proposed change for 926-unit residential land use represents a dramatic change. Many homeowners in the Blackstone and Heritage communities purchased their property on the basis of the current low-density non-residential zoning of adjacent lands.
2. The draft EIR should include the impact of other proposed residential, transportation and retail developments. To consider the Creekside Village proposal as a discrete development would ignore the broader environmental issues resulting from multiple revised land use plans.
3. The traffic impact on Latrope can be easily measured and needs to be reflected in the EIR. Additionally, the EIR needs to include the significant pressure that will be exerted on feeder roads. The EIR should include but is not limited to Carson Crossing Road, Golden Foothills loop, White Rocks, Investment, and Blackstone.
4. The draft EIR should consider the impacts of the proposed development on existing infrastructures and adjacent Community Finance Districts. The Heritage and Blackstone communities currently pay heavy Mello-Roos Special Taxes for community infrastructures. Any impact or utilization of those infrastructures should be evaluated and off-sets need to be established.
5. Given the certified ballot initiative to repeal the CSD LLAD #39 special tax (Heritage Village Park), the use of the LLAD funding to finance future park operations for Creekside Village parks should be called into question. If voters approve the initiative, the invalidity of this financing mechanism in other jurisdictions is possible.
6. The three County Traffic Commission's alternative plans for the area should be factored into the proposed Creekside Village development. The Commission's plans did not take into account the proposed residential development.

---------- Forwarded message ---------
From: **Karen Brown** <kbrown78@gmail.com>
Date: Tue, Dec 1, 2020 at 10:21 PM
Subject: [CreeksideVillageSP] Please oppose the rezoning for Creekside Villages
To: <creeksidevillagesp@edcgov.us>

To Whom it May Concern:

Please oppose the rezoning of the parcel in the El Dorado Hills Business Park for use as a housing development. The vision for that area of the "town" was that it would be for commerce and business purposes. We are just seeing the beginning of what could be a thriving business area. El Dorado Hills and nearby residents deserve to work where we live. That area has so much potential to be used for purposes other than another housing development. I am concerned with the county taking away thoughtful long-term growth plans and changing them with a rezone.

I am also concerned about the traffic that would come with another housing development. The roads already get very backed up, especially through the one lane underpass from Town Center to the rest of El Dorado Hills. How would our roads and neighborhoods and available services handle another nearly 1000 homes?

While our district faces declining enrollment in some schools, the schools closest to this new development all face large class sizes and often lack space in grade levels. If the development does not include a new elementary school, and a clear plan to actually open that elementary school (unlike what happened with Valley View), the families in that new development could be forced to drive to Cameron Park or Shingle Springs for school.

Thank you.

Karen Brown
Resident since 2006

---------- Forwarded message ---------
From: **Krishelle Torres** <ktorres4@gmail.com>
Date: Tue, Dec 1, 2020 at 8:08 PM
Subject: Creekside Village opposition to stopping the proposed development
To: <creeksidevillagesp@edcgov.us>, <gina.hamilton@edcgov.us>, <bosone@edcgov.us>, <bostwo@edcgov.us>, <bosthree@edcgov.us>, <bosfour@edcgov.us>, <bosfive@edcgov.us>

This email opposes the proposed Creekside Village development based on the impacts to:

1) the county changing the general plan and rezoning commercial property in the Business Park to residential

2) the impact to our local schools, which elementary schools are already at or beyond capacity now and EDH students have to go to high schools in different towns when land was purchased in EDH to build.

3) the obvious traffic implications. The traffic implications are not just Latrobe, which will impact Blackstone/Heritage Residents, but also neighboring communities that rely on White Rock Rd. and every community that will rely on an already overcrowded freeway commute. The "walk to work" opinion stated in a meeting is not accurate since there are few companies in the business park and many of us have to find work near Sacramento and keeping it zoned non residential actually can add in allowing for businesses to build and hire current EDH local residents.

4. When we purchased our home we were informed it was zoned non residential and should stay that way. My family moved away from high density "affordable housing" for various reasons including traffic, crime, overcrowding, low income and vandalism. We would not have purchased our home in Blackstone if we knew high density would be built.

Regards,
Krishelle Haavik
Blackstone- El Dorado Hills Home Owner and Resident

---------- Forwarded message ---------
From: **Robert Williams** <bobw1800@gmail.com>
Date: Mon, Nov 30, 2020 at 4:46 PM
Subject: Comment for Draft EIR Creekside Village Specific Plan
To: <gina.hamilton@edcgov.us>

Gina

As a preface, I am a homeowner in the age restricted Heritage Village that is near to the proposed Creekside Village development. I offer the following comments in opposition based on information and belief.

1, The current zoning is appropriate for commercial and R&D utilization. However, the proposed change for 926-unit residential land use represents a dramatic change. Many homeowners in the Blackstone and Heritage communities purchased their property on the basis of the current low density non-residential zoning of adjacent lands.

2. The draft EIR should consider the impact of other proposed residential, transportation and retail developments as direct and impacting factors. To consider the Creekside Village proposal as a discrete development would ignore the broader environmental issues resulting from revised land use.

3. The additional Traffic impact on Latrope can be easily measured, However, the pressure that will be exerted on feeder roads will be significant. The EIR should include but is not limited to Carson Crossing Road, Golden Foothills loop, White Rocks, Investment, and Blackstone.

4. The draft EIR should consider the impacts of the proposed development on existing infrastructures. The Heritage and Blackstone communities currently pay heavy Mello-Roos Special Taxes for finance their respective community infrastructures. Any impact or utilization of those infrastructures should be evaluated and off-sets be established.

5. Given the certified ballot initiative to repeal the CSD LLAD #39 special tax (Heritage Village Park), the use of the LLAD funding to finance future park operations for Creekside Village parks should be called into question. If voters approve the initiative, the invalidity of this financing mechanism in other jurisdictions is possible.

6. The three Traffic Commission's alternative plans for the R&D park should be factored into the proposed Creekside Village development. This residential development was not considered and should be factored into a comprehensive plan before approval.

Respectfully offered

Bob

Robert Williams
6512 Primavera LN El Dorado Hills, CA 95762

From: **Sean Patterson** <drseanpatterson@gmail.com>
Date: Sun, Nov 15, 2020 at 10:40 AM
Subject: [CreeksideVillageSP] Creekside Village NOP Comment
To: <creeksidevillagesp@edcgov.us>

I'd like to state my opposition to building on this open area (which houses natural animals and buffers noise). I also feel it will be visually unappealing and there is already an increase in severely damaged vehicles in auto accidents. I routinely observe people trying to walk and bike down Latrobe Rd. which is very unsafe (this needs remedy, not more cars & homes). Thank you

My personal address is

2608 Wagner Pl, El Dorado Hills, CA 95762

--
Dr. Sean Patterson, D.C.
Body Restore
916-933-0974 fax 916-974-3436
3907 Park Drive Suite 250 El Dorado Hills, CA 95762
2224 Loma Vista Dr. Sacramento, CA 95825
www.DrPatterson.com

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---------- Forwarded message ---------
From: **'Sierra' via PL-Creekside-Village-Specific-Plan-m** <creeksidevillagesp@edcgov.us>
Date: Wed, Dec 2, 2020 at 8:55 PM
Subject: [CreeksideVillageSP] Please don't build
To: <creeksidevillagesp@edcgov.us>

Please do not build more houses at Creekside Villages. This will lead to further overcrowding of local school and increased traffic congestion
Thank you
Sierra Robert

---------- Forwarded message ---------
From: **Suzan Webb** <suze.webb@gmail.com>
Date: Tue, Dec 1, 2020 at 9:26 AM
Subject: Proposed Creekside village in El Dorado Hills
To: <planning@edcgov.us>

Hello,

I am writing in opposition as a person who lives directly opposite this proposed development. One of the very reasons we purchased in this area was because there was commercial zoned and non residential across the street from an already very busy Latrobe Road, which would assist in keeping down the traffic concerns.
Other areas that the planning committee should take into consideration:

Folsom is in the process of putting in 10,000 new homes with the infrastructure in place to support them. Why would EDH want to compete with something literally 4 miles down the road and more desirable when they have so many homes already in the planning stage?
Additionally, the County changed the general plan and rezoned the commercial property in the Business Park to residential without citizen knowledge. Local elementary schools which are beyond capacity. Traffic implications on Latrobe, an already deadly street, which will impact all of El Dorado Hills and Town Center, but also neighboring communities that rely on White Rock Rd creating obstruction merging onto Highway 50.
Also, the proposed 19,000 square foot Tractor Supply retail outlet is a concern with the additional big box store retail traffic it would bring to El Dorado Hills.

Suzan Webb

408 393 3560

suze.webb@gmail.com

From: **Todd** <ToddBollman@msn.com>
Date: Wed, Nov 18, 2020 at 10:25 AM
Subject: [CreeksideVillageSP] Creekside Village NOP Comment
To: creeksidevillagesp@edcgov.us <creeksidevillagesp@edcgov.us>
Cc: Todd <toddbollman@msn.com>

Although I understand that some development will occur, this project seems too dense for the area. And, more importantly, no matter the size of the project, Latrobe Road must be widened to accommodate the traffic generated by the project. Secondly, as part of the improvements to Latrobe Road, there needs to be a pedestrian walkway along the road from the project and up to White Rock Road. There is currently no safe passage for pedestrians along Latrobe from Blackstone to White Rock. Pedestrians currently must walk in the roadway in order to get to and from White Rock while walking along Latrobe. With the addition of more people creating more traffic, walking on the road is not safe nor acceptable.

Please add sidewalks along with curbs and gutters from the Creekside Village project to White Rock Road.

Thank you,

Todd Bollman
141 Lockwood Ct
El Dorado Hills, CA 95762

949-300-7655
toddbollman@msn.com

---------- Forwarded message ---------
From: **'TERI CHATFIELD' via PL-Creekside-Village-Specific-Plan-m** <creeksidevillagesp@edcgov.us>
Date: Mon, Dec 7, 2020 at 12:12 PM
Subject: [CreeksideVillageSP] Creekside village
To: <creeksidevillagesp@edcgov.us>
Cc: Teri Chatfield <terichatfield@aol.com>, George Chatfield <georgechatfield@aol.com>

I am extremely opposed to this project going forward.
They are already doing so much building close to this area. They should not rezone the Business park. Wait and see after all the other planned building is completed and see the impact it has before rezoning for any new developments. The residents overwhelming oppose the Creekside Project. The have already added houses to Blackstone and Heritage. The apartments in Town Center aren't even completed yet but a stoplight has already been added anticipating the extra traffic that will come. There are thousands of houses in Folsom that affect white rock road, Latrobe and the freeway entrances and exits. There is also another subdivision above Blackstone to be built. Please don't take the special place that El Dorado Hills is and turn it into a mass density city. You will be destroying it.

Traffic will become unbearable. We do not have the proper infrastructure for this project. White rock turns into a one lane road in each direction, Latrobe also turns into one lane in each direction and Valley View Parkway is the same. It would be incredibly dangerous with all the fires California has had the last few years. If we have a fire it would be impossible to evacuate with the number of cars on the road. There are many elderly people who live in this area and people with disabilities. Many people will die in the case of any natural disaster here. There simply will be too many people who will be trapped because too many cars on too few roads to evacuate.

I attended the meeting in November 2019. This Creekside project was described as a walking and biking community. If you lived here you would know that is a straight out lie. The sidewalk on Latrobe dead ends about 1/2 mile from the project. No one walks or bikes on Latrobe. Going through Blackstone would impact the quality of life for the residents and the added cars, bikes and Pedestrians from Creekside would make walking and driving to the school dangerous. Because our school is a charter we already have extra hundreds of cars a day going through Blackstone. Again our streets in Blackstone have one lane in each direction.

It was said that all people would work in the business park. Another lie. No one knows where the people will work but with 900 units being built you will have 1800 more cars on the road everyday. Extremely dangerous.

Our schools here are already full. The on-ramps to the freeway are already backed up before Covid and will be after Covid.

Where will the children who live in the proposed Creekside go to school. The elementary, middle schools, and high schools are already overcrowded and the kids who already live here have to be bused or driven away from our community.

We have learned in the last year that people who live in small areas with a large population are the places where Covid has caused the most deaths. Mass density is not working in California right now. Do you want to make El Dorado Hills into the next big city mass density experiment? I know I don't. Don't ruin the quality of life for the citizens who live here already. Please!

Teri, George, and Brian Chatfield
2000 Keystone Dr
El Dorado Hills, CA
95762
650-740-9763

Sent from my iPhone

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

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OUR FILE NUMBER
005945.00009
30590616.1

December 7, 2020

VIA EMAIL: CREEKSIDEVILLAGESP@EDCGOV.US AND VIA U.S. MAIL

Gina Hamilton, Senior Planner
County of El Dorado Planning Division
2850 Fairlane Court
Placerville, CA 95667
Email: creeksidevillagesp@edcgov.us

Re: Comments from Latrobe School District Re Notice of Preparation for Creekside Villages

Dear Ms. Hamilton:

Please be advised the undersigned represents the Latrobe School District ("District") in connection with the above-referenced matter.

By this letter, the District provides its comments in connection with the Notice of Preparation for the Creekside Villages Project (the "Project").

The District has conducted an initial meeting with the Project developer, Winn Communities, to discuss the Project's impact on the District. Notwithstanding this, the District provides the following comments so that it may preserve and protect its administrative and legal remedies under the provisions of the California Environmental Quality Act ("CEQA").

Given the distance of the Project from the District's nearest school sites, coupled with the scarcity and rural character of available roads, it is imperative that traffic impacts be sufficiently analyzed and impacts flowing from travel to and from District schools to the Project be specifically accounted for. Traffic impacts should be analyzed to include (but not necessarily be limited to) the following:

1) The direct, indirect, and cumulative impacts the Project will have on the circulation and traffic patterns of the Project in the event the District needs to transport students to other schools within the District to address the potentially overcrowded conditions of its schools, including:

a) the Project-specific and cumulative impacts of the required bussing that would need to be implemented by the District;
b) the Project-specific and cumulative impacts of the required private vehicle transportation of students to address the overcrowded conditions of schools and the need to transport these students to other schools within the District's boundaries;
c) the Project-specific and cumulative impacts of the added required private and public vehicles of the teachers and employees of the District that would be required as a direct result of the students generated by the Project;
d) the Project-specific and cumulative impacts of added pedestrian movements and the safety of students walking to and from schools and/or bus stop or other public transportation locations; and
e) the Project-specific and cumulative impacts to air quality that will result from the transportation impacts identified hereinabove.

In addition to traffic-related impacts, the direct, indirect, and cumulative impacts the Project will have on increased utility usage (including gas, electricity, water, sewage, and waste water treatment, etc.) at District schools where students generated as a direct result of the Project will be housed should be analyzed as should the direct, indirect, and cumulative impacts the Project will have on the need for public services at District schools that will ultimately house the students generated by the Project.

Furthermore, in order for the District to accommodate the students from the Project which are not accommodated by mitigation measures, the District may have to modify attendance area boundaries, load classrooms with students in excess of District and State standards, and house students in potentially inadequate and inappropriate school facilities throughout the District attendance area. This effect on the overall operation and administration of the District, its students, employees, and constituents affected by such actions must be addressed since it will undoubtedly result in physical, social, financial, and psychological impacts on the students, employees, and constituents of the District.

We look forward to reviewing the lead agency's response to the foregoing. Please feel free to contact the undersigned with any questions or concerns regarding any of the foregoing.

Very truly yours,

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

David A. Soldani

David A. Soldani

DAS:las

cc: Natalie Miller, LUESD Superintendent

Question Report				
Report Ger	11/24/2020 10:10			
Topic	Webinar ID	Actual Start Time	Actual Duration (mi	# Question
Creekside V	924 1489 7860		93	22
Question Details				
#	Question	Asker Name	Asker Email	Answer(s)
1	With 900+ homes and only two entrances to Latrobe, are you planning to put in stop lights at those intersections?	Bob Hendricks	robert.hendricks@f	live answered
2	Where will kids from the subdivision be zoned for school (elementary and high school)?	Nicole	nlpinjuv@yahoo.co	live answered
3	Will these 900+ homes feed into William Brooks Elementary? If so, has it been confirmed that they have capacity?	Ginny Walker	ginnylynn59@gmail	live answered
4	Can we get that information before written comments are due?	Nicole	nlpinjuv@yahoo.co	live answered
5	What are the average lot sizes? Are these Zero Lot line homes? When you say that the homes you hope to build are more affordable, are these going to be low income housing?	Bob Hendricks	robert.hendricks@f	live answered
6	Has there been a preliminary traffic study determining the impact on Latrobe road south of the development?	cedra	cedratm@yahoo.co	live answered
7	The planned subdivision is located within the Latrobe School District. How will the developer work with the district to mitigate the impact to the district?	Anonymous Attendee		live answered
8	There was mention of in-law units or ADUs in the plans. Can you please expand on that? If there are 900+ properties, will there be more than one living unit on some of those -- thus there would be more than 900+ families potentially?	Ginny Walker	ginnylynn59@gmail	live answered
9	Can you address the project's traffic volumes as a residential revelopment in comparision with the existing zoning for R&D and Industrial Zoning?	John Davey	jmdavey67@gmail.c	live answered
10	is latrobe road going to be widened	graziano	jgja4@yahoo.com	live answered
11	What is an "accessory dwelling" unit" and a "junior accessory dweling unit" as listed in your project description? Can you provide specifics on what these are?	Bob Hendricks	robert.hendricks@f	live answered

12	What is the specific scope of the analysis of impacts to the local educational agency -- Latrobe School District in this case -- for traffic, student generation, etc., proposed for this project?	david soldani	dsoldani@aalrr.com	live answered
13	is there only one buider	graziano	jgja4@yahoo.com	live answered
14	What is the timeline for the development?	cedra	cedratm@yahoo.co	live answered
15	Can you confirm that these homes are only single family units, and will not include multi-family units ie. duplex, apartment type etc	Bob Hendricks	robert.hendricks@f	live answered
16	Would there be a future option to convert the medium density products to an alternate lower density - perhaps to a similar density as the single family Low Density products, if the market supports that in future years? Esentially lowering the overall density of the Plan Area?	John Davey	jmdavey67@gmail.c	live answered
17	What is the impact on White Rock Road?	Dan Cockcroft	dan.croft@comcast	live answered
19	Have there been consideration to schools and high schools with more people when. We can not have all EDH resident teens at oak ridge already? Where will they go? New schools?	Brielle Black	sakika3@hotmail.co	live answered
22	Has a sales price-range been determined for these units? You mention that they are "market-rate" housing, but also that these units are for starter families. Market rate in the area starts at $500k, which is not an affordable starter home for young families. Also why is this project being planned when right over the hill in Folsom they are building 10,000 new homes	Bob Hendricks	robert.hendricks@f	live answered

PLANNING AND BUILDING DEPARTMENT

PLANNING DIVISION

www.edcgov.us/Government/Planning

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2850 Fairlane Court, Placerville, CA 95667
BUILDING
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bldgdept@edcgov.us
PLANNING
(530) 621-5355 / (530) 642-0508 Fax
planning@edcgov.us

LAKE TAHOE OFFICE:
924 B Emerald Bay Rd
South Lake Tahoe, CA 96150
(530) 573-3330
(530) 542-9082 Fax

NOTICE OF SECOND SCOPING MEETING AND EARLY CONSULTATION WITH PUBLIC FOR DRAFT ENVIRONMENTAL IMPACT REPORT

On November 6, 2020, El Dorado County as lead agency issued a Notice of Preparation for the **Creekside Village Specific Plan Project** (General Plan Amendment GPA20-0001, Rezone Z20-0005, Specific Plan SP20-0001, Tentative Map TM20-0002) ("Project") (State Clearinghouse No. 2020110052) in the El Dorado Hills area. A scoping meeting was held pursuant to the California Environmental Quality Act ("CEQA") Guidelines (14 California Code of Regulations) section 15082 on November 19, 2020. A thirty-day comment period was provided consistent with the requirements of CEQA and environmental review for the Project commenced. In October 2021, the applicant requested the Project application be placed on hold and, on July 19, 2023, the applicant requested El Dorado County to resume processing the application. To avoid confusion and comply with CEQA Guidelines section 15082(e) requiring that a single State Clearinghouse identification number be used for all environmental documents on a project, El Dorado County will continue to prepare the Draft Environmental Impact Report for the Project with State Clearinghouse identification number 2020110052.

CEQA Guidelines section 15083 provides that a lead agency may engage in early consultation with the public and "[t]his early consultation may be called scoping." The applicant has also requested early consultation with the public to receive feedback from the community. Therefore, a second scoping meeting and early consultation with the public will be held on **Tuesday, September 26, 2023,** from 6:00 to 7:30 PM at the El Dorado Hills Fire Station 85 Conference Room, 1050 Wilson Boulevard in El Dorado Hills. In addition to attending in person, attendees may also observe and participate remotely with the following link: https://us06web.zoom.us/j/85750667220. Attendees may also participate and join by phone: 1-530-621-7603 or 1-530-621-7610 (Webinar ID: 857 5066 7220).

The previously issued Notice of Preparation, including a description of the Project, maps showing the location of the Project south of Highway 50, west of Latrobe Road, and south of Investment Boulevard in the El Dorado Hills area (APN 117-010-032 and a portion of APN 117-010-031; previously numbered APN 117-010-012), and probable environmental effects of the Project, is available at: https://www.edcgov.us/planning. The project applicant proposes to develop a 918-unit residential community located on an approximately 208-acre site. The Project remains consistent with the description in the Notice of Preparation with minor revisions, including

the addition of an approximately 1.8-acre neighborhood commercial area in response to requests from the community to add a small neighborhood commercial component and the removal of 8 proposed units. The project would include 115.8 acres of single-family low-density residential development, 20.8 acres of single-family medium-density residential development, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, 1.8 acre of neighborhood commercial, and 11.1 acres of roadways.

At the second scoping meeting and early public consultation, El Dorado County will receive verbal comments regarding the Project and scope and content of the Draft Environmental Impact Report and answer general questions regarding the environmental process. Written comments may also be provided no later than 5:00 PM on Thursday, October 12, 2023, and should include "Creekside Village NOP Comment" in the subject line. Written comments may be sent to:

Anna Leanza, Senior Planner
County of El Dorado Planning Division
2850 Fairlane Court
Placerville, CA 95667
Email: creeksidevillagesp@edcgov.us

El Dorado County is committed to ensuring that persons with disabilities are provided the resources to participate in its public meetings. If you require accommodation, please contact Planning Services at 530-621-5355 or via e-mail, planning@edcgov.us.

El Dorado County
Air Quality Management District

330 Fair Lane, Placerville Ca 95667
Tel. 530.621.7501 Fax 530.295.2774
www.edcgov.us/airqualitymanagement

Dave Johnston
Air Pollution Control Officer

October 2, 2023

Anna Leanza, Senior County Planner
El Dorado County Planning Services
2850 Fairlane Court
Placerville, CA 95667

Subject: GPA20-0001/SP20-0001/Z20-0005/TM20-0002 Creekside Village – AQMD Comment

Dear Ms. Leanza:

The El Dorado County Air Quality Management District (AQMD) has reviewed the General Plan Amendment request for the development of 676 single-family dwelling units (low and medium density); 14.3 acres of parks and 46.3 acres of open space with walking trails, bike paths, and neighborhood parks; a community center; and two (2) unparcelled large lots for future development of 250 single family homes (total of 926 homes). The property, identified by Assessor's Parcel Number 117-010-012, consists of 207.91 acres, and is located on the west side of Latrobe Road, approximately 895 feet south of the intersection with Investment Boulevard, in the El Dorado Hills area,

Air Quality/GHG Analysis is required for the proposed development:

The western portion of El Dorado County (where the project is located) is in non-attainment of the state Ambient Air Quality Standards (AAQS) for Particulate Matter 10 micrometers (PM10), and the federal AAQS for PM2.5 (2.5 micrometers) in size. Additionally, the county's western portion is in non-attainment of the 1-hour and 8-hour state AAQS for ozone and of the 8-hour federal AAQS for ozone. The two ozone precursor pollutants most responsible for ozone generated by this project are Volatile Organic Compounds (VOC, also known as Reactive Organic Gases or ROG) and Nitrogen Oxides (NOx).

An Air Quality and Greenhouse Gas (GHG) Analysis is required for adequate environmental review of the proposed project. AQMD recommends the use of the California Emissions Estimator Model (CalEEMod), which can be downloaded for free at www.caleemod.com. This will compute mass emissions of criteria pollutants (NOx, ROG, SOx, PM & CO) and GHG (in CO2 equivalents) from both construction and operation of the project. Someone knowledgeable in all aspects of the project, such as construction phasing, materials usage, etc., should run the model and modify the defaults as appropriate, assuring that notes are included about any changes to defaults as the program requires.

AQMD's Guide to Air Quality Assessment: Determining Significance of Air Quality Impacts under the California Environmental Quality Act, February 2002 ("CEQA Guide") should be used to assess criteria pollutant emissions impacts and can be found here: https://www.edcgov.us/Government/AirQualityManagement/pages/Guide_to_Air_Quality_Assessment.aspx

Additionally, the following standard conditions may apply to the project:

- Fugitive Dust: As we understand the project, there will be no grading or construction necessary. Please be advised that a Fugitive Dust Mitigation Plan (FDP) Application with appropriate fees shall be submitted to and approved by the EDCAQMD prior to start of project construction if during the course of the project a Grading Permit is required from the Building Department, Dust control measures shall comply with the requirements of AQMD Rule 223, Fugitive Dust – General Requirements and Rule 223.1 – Construction, Bulk Material Handling, Blasting, Other Earthmoving Activities and Trackout Prevention.

- Open Burning: Burning of waste vegetation that results from "Land Development Clearing" must be permitted through the AQMD. Only dry vegetative waste materials originating from the property may be disposed of using an open outdoor fire. Burning shall adhere to AQMD Rule 300, Open Burning.

- Paving: Road construction shall adhere to AQMD Rule 224, Cutback and Emulsified Asphalt Paving Materials.

- Painting/Coating: The application of architectural coatings shall adhere to AQMD Rule 215, Architectural Coatings.

- New Point or Stationary Source: Prior to construction/installation of any new point/stationary source emissions units (e.g., emergency standby engine greater than 50 HP, etc.), Authority to Construct applications shall be submitted to the AQMD. Submittal of applications shall include facility diagram(s), equipment specifications and emissions estimates, and shall adhere to AQMD Rules 501, General Permit Requirements and 523, New Source Review.

- Open Burning: Burning of waste vegetation that results from "Land Development Clearing" must be permitted through the AQMD. Only dry vegetative waste materials originating from the property may be disposed of using an open outdoor fire. Burning shall adhere to AQMD Rule 300, Open Burning.

- Construction Emissions: During construction, all self-propelled diesel-fueled engines greater than 25 horsepower shall be in compliance with the California Air Resources Board (CARB) Regulation for In-Use Off-Road Diesel Fueled Fleets (§ 2449 et al, title 13, article 4.8, chapter 9, California Code of Regulations (CCR)). The full text of the regulation can be found at CARB's website here: https://ww2.arb.ca.gov/our-work/topics/construction-earthmoving-equipment Questions on applicability should be directed to CARB at 1.866.634.3735. CARB is responsible for enforcement of this regulation.

- Portable Equipment: All portable combustion engine equipment with a rating of 50 horsepower or greater shall be registered with CARB. A copy of the current portable equipment registration shall be with said equipment. The applicant shall provide a complete list of heavy-duty diesel-fueled equipment to be used on this project, including the make, model, year of equipment, and daily hours of operations of each piece.

- Electric Vehicle Charging – Residential: The residential portion of project shall comply with the Residential Mandatory Measures identified in the 2022 Cal Green Building Code §4.106.4.2.2 to facilitate future installation and use of EV chargers[1]. Please refer to: Chapter 4 Residential Mandatory Measures, 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen) | ICC Digital Codes (iccsafe.org)

- Electric Vehicle Charging – Non-Residential: The commercial portion of the project shall comply with the non-Residential Mandatory Measures identified in the 2022 Cal Green Building Code to facilitate future installation and use of EV chargers2. Please refer to: https://www.dgs.ca.gov/BSC/CALGreen

If you have any questions, please do not hesitate to contact me at (530) 621-7509. The complete list of District Rules can be viewed at: https://ww2.arb.ca.gov/current-air-district-rules.

Respectfully,

Rania Serieh
Sr. Air Quality Engineer

[1] Cal Green Building Code: CHAPTER 4 - RESIDENTIAL MANDATORY MEASURES, 2019 California Green Building Standards code, Title 24, Part 11 with July 2021 Supplement | ICC Digital Codes (iccsafe.org)

[2] Cal Green Building Code: CHAPTER 5 NONRESIDENTIAL MANDATORY MEASURES, 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen) | ICC Digital Codes (iccsafe.org)

\\AQData\AQ-Shared\CEQA or AQMD COMMENTS\AQMD Comments\2023\ GPA20-0001 SP20-0001 Z20-0005 TM20-0002 – Creekside Village

Sent via email

Hi Anna,

Thank you for the information that was shared last evening at the EDH Firehouse meeting.

After the Project Frontier battle, the Creekside Village plan seems like a much better fit.
Given the location, residential development makes much more sense than warehousing and semi truck traffic.

While I agree in principal to the project, I remain concerned about the impacts to our existing community.
My back yard is on Royal Oaks and looks down on the location of this development.

My concerns include:

- Traffic congestion and noise created by 900+ new homes.
- Nighttime lighting and our dark sky community (the original plan for research and development use would have been quiet and dark at night)
- Not sure we need a small commercial area with 3 small buildings. Seems it would be better to just add that space to the park.

As the county moves forward with their analysis of this project, I will be interested in seeing what the traffic, noise and nighttime light studies reveal about this development plan.

Please continue to keep our community informed.
Thank you for your support and understanding,

Mati Keerd

Superintendent/Principal
Dave Scroggins

Board Members
Jared Meredith
Janet Saitman
Scot Yarnell

October 12, 2023

By E-Mail: creeksidevillagesp@edcgov.us

Anna Leanza
Senior Planner
County of El Dorado Planning Division
2850 Fairlane Court
Placerville, CA 95667

Re: Response of Latrobe School District to Notice of Preparation of Environmental Impact Report for the Creekside Village Project

Dear Ms. Leanza:

This correspondence provides the Latrobe School District's ("District") comments with regard to the above-referenced project. The District appreciates the opportunity to provide comments and input regarding the Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Creekside Village Project ("Project") to be located west of Latrobe Road, and south of Investment Boulevard in the El Dorado Hills area as proposed by El Dorado County ("County").

As per the NOP, the EIR will evaluate the environmental impacts associated with the Project. The project would include 115.8 acres of single-family low-density residential development, 20.8 acres of single-family medium-density residential development, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, 1.8 acre of neighborhood commercial, and 11.1 acres of roadways (collectively, the "Property"). This project is anticipated to generate a significant number of students, which would in turn create a significant strain on existing District facilities.

As an invested stakeholder in the future of the County and the community, the District provides the comments below to help support the County's planning process and valuation of the Project to ensure that the interaction between the County's long-term planning and the community's school needs are adequately analyzed through the EIR. Given the interplay between the California Environmental Quality Act ("CEQA") and school facilities funding, this scoping letter also provides context for consideration in the EIR.

A. School Facilities Funding

SB 50 declares that the payment of the developer fees authorized by Education Code section 17620 constitutes "full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities." (Gov. Code § 65995(h).) **However, California courts have acknowledged that developer fees do not constitute full and complete mitigation for school-related impacts other than school overcrowding.**

(*Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016.). Thus, payment of fees do not constitute full mitigation for all impacts caused by development, nor does SB 50 obviate the need for a county to evaluate environmental impacts on schools when developing an EIR. Impacts related to traffic, noise, biological, pedestrian safety, and all other types of impacts related to the District and its educational program still need to be analyzed and mitigated.

To that end, statutory developer fees are fees that may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. (Ed. Code § 17620.) If a school district is able to establish a sufficient "nexus" between the expected impacts of residential and commercial development and the district's needs for facilities funding, it may charge a fee as prescribed by statute.

From a practical standpoint, the amount of developer fees received by school districts typically fall woefully short of alleviating the impacts caused by development. This is due largely to the facts that: (1) statutory developer fee amounts fail to acknowledge the differences in costs of school construction from one district to another; (2) the developer fee amounts fail to contemplate the special facilities needs of those districts experiencing rapid growth, such as the need for portables; and (3) the adjustment formula for developer fees is based on a "construction cost index" and does not include indexing related to the increases in land costs, resulting in the actual costs of facilities (i.e., land and improvements) increasing at a greater rate than the adjustment.

The inadequacy of developer fees as a source of funding for school facilities has forced school district to rely increasingly on other sources of funding, primarily including local bond funds and State bond funds administered under the School Facilities Program ("SFP"). However, these sources of funds can be equally unreliable. Local bond funds are also difficult to generate, as local bonds are subject to district bonding capacity limitations and voter approval. Either way, the funding formula was never intended to require the State and local taxpayers to shoulder a disproportionate portion of the cost of school facilities.

With the foregoing context in mind, below are specific scoping requests for the EIR, to evaluate adequately with potential environmental impacts of the Project on schools.

B. <u>Transportation / Circulation / Traffic Analysis</u>

1. **Describe the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including consideration of bus routes.**

2. **Assess the impact(s) of increased vehicular movement and volumes caused by the Project, including but not limited to potential conflicts with school pedestrian movement, school transportation, and busing activities.**

3. **Estimate travel demand and trip generation, trip distribution, and trip assignment by including consideration of school sites and home-to-school travel.**

4. **Assess cumulative impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending in the County.**

5. **Assess the impacts on the routes and safety of students traveling to school by vehicle, bus, walking, and bicycles.**

The District has significant concerns about the traffic, transportation, and circulation impacts that the Project may have on schools, the District's staff, parents and students.

(a) County Must Consider All Traffic and Related Impacts, Including Impacts on Traffic on Student Safety, Caused by the Project.

Any environmental analysis related to the Project must address potential effects related to traffic, noise, air quality, and other issues affecting schools. (Pub. Resources Code, §§ 2100, et seq.; Cal. Code Regs., tit. 14 §§ 15000, et seq.; *Chawanakee Unified School District v. County of Madera, et al.*, (2011) 196 Cal.App.4th 1016.) Specifically related to traffic, there must be an analysis of safety issues, such as reduced pedestrian safety; potentially reduced response times for emergency services and first responders traveling to these schools; and increased potential for accidents due to gridlock during school drop-off and pick up hours. (See, Journal of Planning Education and Research, "Planning for Safe Schools: Impacts of School Siting and Surrounding Environments on Traffic Safety," November 2015, Chia-Yuan Yu and Xuemei Zhu, pg. 8 [Study of traffic accidents near Austin, Texas schools found that "[a higher percentage of commercial uses was associated with more motorist and pedestrian crashes" around schools].)

The State Office of Planning and Research has developed new CEQA Guidelines which set forth new criteria for the assessment of traffic impacts, and now encourages the use of metrics such as vehicle miles traveled ("VMT"), rather than level-of-service ("LOS"), to analyze project impacts on traffic. (14 Cal. Code Regs. §15064.3.) However, local agencies may still consider impacts on traffic congestion at intersections where appropriate and must do so where, as here, such traffic congestion will cause significant impacts on air quality, noise, and safety issues caused by traffic. (Pub. Res. Code § 21099(b)(3).)

To the extent changes in the Project may implement construction that impedes circulation in the County, and clog the access roads to, from, and around the District campuses, such items should be addressed in the EIR. (See, 5 Cal. Code Regs. § 14010(k), which requires that school facilities be easily accessible from arterial roads.)

In addition to increased risks of vehicular accidents, the traffic and parking impacts posed by the Project may impact the safety and convenience of students who walk or bike to school. Title 5 of the California Code of Regulations requires that school sites be located within a proposed attendance area that encourages student walking and avoids extensive bussing. (5 Cal. Code Regs. § 10410(1).) Studying these impacts would also achieve the County's General Plan policies to promote a safe and efficient transit system that provides service to all residents, including senior citizens, youths, the disabled, and those without access to automobiles that also helps to reduce congestion, and improves the environment under Goal TC-2 and to provide safe,

continuous, and accessible sidewalks and pedestrian facilities as a viable alternative transportation mode under TC-5.

As per the District Board Policy 3510, the District is committed to reducing vehicle emissions by encouraging students to walk or bicycle to school or to use district or public transportation.

It is important that these traffic impacts are not only assessed through a VMT analysis, but also through a LOS analysis, as traffic congestion that may result from the Project may cause significant issues related to safety, noise, and air quality.

C. <u>Noise</u>

6. Identify any noise sources and volumes which may affect school facilities, classrooms and outdoor school areas.

Request 6 is intended to clarify that the EIR's consideration of noise issues take into account various ways in which noise may impact the schools, including, for instance, increases in noise levels in the immediate vicinity of playing fields. Maintaining the accessibility and usability of the District's playing fields is in line with the County's principle to "Provide adequate recreation opportunities and facilities including developed regional and community parks, trails, and resource-based recreation areas for the health and welfare of all residents and visitors of El Dorado County." (El Dorado County General Plan p. 186.)

D. <u>Population</u>

7. Describe historical, current, and future population projects for the District.

8. Assess the impacts of population growth within the District on the District's ability to provide its educational program.

The District specifically requests that historical, current, and future population projections for the District be addressed. Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact the District and its provision of educational services. Overcrowding can constitute a significant impact within the meaning of CEQA. (See Cal. Code Regs., §§15064(e).) This is particularly true where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and requires new school construction. The same can hold true for potential school closures of program cuts resulting from a declining population.

E. <u>Housing</u>

9. Describe the type and number of anticipated dwelling units indirectly resulting from the Project.

10. Describe the average square footage for anticipated dwelling units, broken down by type of unit, indirectly resulting from the Project.

11. **Estimate the amount of development fees to be generated by development in accordance with implementation of the Project.**

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District caused by increased population growth.

California school districts are dependent on developer fees authorized by the provisions of Government Code Sections 65995, *et seq.*, and Education Code sections 17620, *et seq.*, for financing new school facilities and maintenance of existing facilities. The developer fees mandated by Section 65995 provide the District a significant portion of its local share of financing for facilities needs related to development.

The adequacy of the statutory development fees to offset the impact of new development on local school districts can be determined only if the types of housing and average square footage can be taken into consideration. For instance, larger homes often generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek – and presumably to receive – such square footage information from local planning departments. (Gov. Code § 65995.5(c)(3).)

While the foregoing funding considerations raise fiscal issues, they translate directly into physical, environmental impacts, in that inadequate funding for new school construction results in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to an EIR, particularly when they either contribute to or result from physical impacts. (Pub. Resources Code § 21001(g); 14 Cal. Code Regs. §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

Phasing of development is also a crucial consideration in determining the extent of impacts on schools. The timing of the development will determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other approved or pending development.

F. <u>Public Services</u>

12. **Describe existing and future conditions within the District, on a school-by-school basis, including size, location, and capacity of facilities.**

13. **Describe the adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.**

14. **Describe the District's past and present enrollment trends.**

15. **Describe the District's current uses of its facilities.**

16. **Describe projected teacher/staffing requirements based on anticipated population growth and existing State and District policies.**

17. **Describe any impacts on curriculum as a result of anticipated population growth.**

18. **Identify the cost of providing capital facilities to properly accommodate students on a per-student basis, by the District (including land costs).**

19. **Identify the expected shortfall or excess between the estimated development fees to be generated by the Project and the cost for provision of capital facilities.**

20. **Assess the District's present and projected capital facility, operations, maintenance, and personnel costs.**

21. **Assess financing and funding sources available to the District, including but not limited to those mitigation measures set forth in Section 65996 of the Government Code.**

22. **Identify any expected fiscal impacts on the District, including an assessment of projected cost of land acquisition, school construction, and other facilities needs.**

23. **Assess cumulative impacts on schools resulting from additional development already approved, pending, or anticipated.**

24. **Identify how the District will accommodate students from the Project who are not accommodated at current District schools, including the effects on the overall operation and administration of the District the students and employees.**

CEQA Guidelines, Appendix G, states that a project may have public services impacts on schools if the project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives" for the provision of school services.

There are a myriad of ways in which large residential and commercial development projects can impact a school district's need for new or physically altered facilities in order to maintain performance objectives. The EIR should analyze all potential impacts under this standard, including but not limited to: (1) whether the influx of students would require "physically altered" school facilities unrelated to the accommodation of additional enrollment; (2) whether other impacts of the proposed Project, such as increased traffic, noise, or air pollutants in the neighborhood, could impact the District's need for new or physically altered school facilities; and (3) whether other impacts of the proposed Project could otherwise interfere with the District's ability to accomplish its own performance objectives. Consideration of the above-listed categories information is essential to properly making these determinations.

The District wishes to make certain that each of these issues is directly discussed in the EIR. Regarding Requests 12-15, each of these requests go to the issue of the current condition of the District. Infrastructure is included for consideration precisely because it is an often overlooked factor. While it may appear that a school site has sufficient space to accommodate additional

students, an inadequate infrastructure – which might include cafeterias, restroom facilities, sewerage, electrical capacity, and the like – may preclude such growth. Placing too great a strain on the infrastructure is itself a physical impact to be addressed in an EIR. In particular the District's water supply is currently provided by a well on campus. This well does not have the capacity to support the large scale increase in student population that will occur due to the Project. As such, the EIR must address the impacts related to the lack of water at the school site and the impacts related to the actions necessary to ensure the District has an adequate water supply.

Relative to Request 12, the EIR should also address the location of current planned school sites in all affected school districts, both to determine the adequacy of the space existing or available for school facilities and also to address traffic, student safety and related impacts affected by a school's location.

The population elements addressed in Request 14 are essential because the ultimate impact of growth can best be determined by comparing existing student enrollment, expected future enrollment, and total school capacity.

Request 15 is a necessary consideration because certain school facilities may have been designated for particular community uses, or otherwise be unavailable for full classroom service, meaning that they cannot be considered in determining the District's total capacity. Also, some classrooms are dedicated as labs, meaning that they cannot hold the full compliment of students that would occupy a traditional classroom, again affecting a school's total capacity. Requests 16 and 17 are included because they are relevant to the social impacts which may stem from the Project. Such impacts are relevant to the extent they are caused by or result from physical impacts, which would include growth. (Pub. Res. Code § 21001(g); Cal.Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 &; 15382.) If classrooms become overcrowded, or certain programs cannot be offered because of overwhelming student demand, the community's educational services are harmed, a clear social impact. Further, overcrowded classrooms create additional safety concerns, both for students and teachers.

Requests 18 through 22 deal with fiscal impacts on the District. The most immediate means of determining whether school overcrowding will occur is to determine first whether the District has adequate available capacity, and second, if not, whether it has adequate sources of funding available to construct new facilities or expand existing ones. This requires consideration of how much it costs to house each student, and how much of that amount can be covered by existing funding sources. To the extent that the existing sources prove insufficient, the difference is an unmitigated impact on the District.

Finally, Request 23 again seeks to ensure that a cumulative impact analysis is conducted, as there has been significant development approved and projected within the District's borders.

G. <u>Social</u>

25. Identify how school facilities are currently utilized as civic centers, and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use.

26. **Identify how the District's grounds are currently utilized for recreation (parks) and open space, and are projected to serve in that capacity in the future, and assess the impacts of the Project on that use.**

These two requests are made in light of school districts' roles in providing recreational space and civic centers to the community. As overcrowding increases at school sites, the community's ability to so utilize school facilities becomes limited, which is both a physical and a social impact on the community. For example, the addition of relocatable classrooms to house new students may reduce available playing field or recreational space. Similarly, moving schools to multi-track class schedules, or having to set aside additional space for new alternative education students, may interfere with the community's ability to gain access to school facilities for civic use.

Conclusion

The District is prepared to provide any information necessary to assist the County in preparation of the EIR and in addressing each of the comment and scope/content issues set forth above. The District is committed to working with the County and any developers to ensure that the District's needs are met and that development located in the area of the proposed Project as well as all of the residents of the community can receive adequate and appropriate educational facilities.

Finally, we request that all notices and copies of documentation with regard to this Project be mailed both to the District directly, and also to our legal counsel's attention as follows:

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Please feel free to contact me directly if we can be of any assistance in reviewing the above issues. Thank you.

Sincerely,

Dave Scroggins
Superintendent/Principal
Latrobe School District