FINAL ENVIRONMENTAL IMPACT REPORT

CREEKSIDE VILLAGE SPECIFIC PLAN

SCH No. 2020110052
October 2025









Prepared for:

COUNTY OF EL DORADO
Planning and Building Department – Planning Division
2850 Fairlane Court
Placerville, California 95667

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
APAC	Area Planning Advisory Committee
BMP	best management practice
CARB	California Air Resources Board
CC&R	covenants, conditions, and restriction
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CO_2e	carbon dioxide equivalent
County	County of El Dorado Hills
CSD	Community Service District
CUP	Conditional Use Permit
CVSP	Creekside Village Specific Plan Project
DR	drainage report
EDCAQMD	El Dorado County Air Quality Management District
EID	El Dorado Hills Irrigation District
EIR	environmental impact report
EV	electric vehicle
EVA	Emergency Vehicle Access
FIL	Facilities Improvement Letter
FSP	Fire Safe Plan
GHG	greenhouse gas
HOA	homeowners association
ITE	Institute of Traffic Engineers
ITP	Intentional Take Permit
LID	Low Impact Development
LOS	level of service
MMRP	mitigation monitoring and reporting program
MT	metric tons
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
PD	planned development
PG&E	Pacific Gas and Electric Company
PPH	persons per household
proposed project	Creekside Village Specific Plan Project
RIA	Reduced Impact Alternative

Acronym/Abbreviation	Definition
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SMAQMD	Sacramento Metropolitan Air Quality Management District
SWPPP	stormwater pollution prevention plan
TCR	tribal cultural resource
USACE	U.S. Army Corps of Engineers
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program

1 Introduction

This Final Environmental Impact Report (EIR) contains the public and agency comments received during the public review period for the Creekside Village Specific Plan Project (or proposed project) Draft EIR.

The EIR is an informational document intended to disclose to the Lead Agency, the County of El Dorado (County), and the public the environmental consequences of approving and implementing the Creekside Village Specific Plan Project or one of the alternatives to the project described in the Draft EIR (see Draft EIR Chapter 6, Alternatives). All written comments received during the public review period (June 20 through August 19, 2025) on the Draft EIR are addressed in this Final EIR. During the public review period, the County received a total of 8 comment letters from public agencies and individuals. All comment letters are included in Appendix A, Comment Letters, of this Final EIR.

The responses in this Final EIR clarify, correct, and/or amplify text in the Draft EIR, as appropriate. Also included are text changes made at the initiative of the Lead Agency. These changes (summarized in Chapter 2, Changes to the Draft Environmental Impact Report) do not alter the conclusions of the Draft EIR.

1.1 Background

In accordance with the California Environmental Quality Act (CEQA), the County released a Notice of Preparation (NOP) on November 6, 2020, for the required 30-day review period. The purpose of the NOP was to provide notification that an EIR for the Project was being prepared and to solicit guidance on the scope and content of the document. The County received a total of 22 written comment letters during the initial scoping period from the general public as well as comment letters from local, state, and federal agencies. Verbal comments were also received during a scoping meeting held on November 19, 2020. However, the project application was placed on hold from October 2021 through July 2023, and minor updates were made to the project description. Therefore, the County held a second scoping meeting on September 26, 2023, and additional comments on the revised project were accepted through October 12, 2023. Two additional comment letters were received as well as several verbal comments at the second scoping meeting held on September 26, 2023. The Draft EIR was circulated for public review and comment for a period of 60 days from June 20 through August 19, 2025.

The comments and responses that make up the Final EIR, in combination with the Draft EIR, as amended by the text changes (see Chapter 2 of this Final EIR, Changes to the Draft Environmental Impact Report), constitute the EIR that will be considered for certification by the County's Planning Commission and Board of Supervisors.

1.2 California Environmental Quality Act Requirements

The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that the Final EIR shall consist of:

a) The Draft EIR or a revision of the Draft.

b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

e) Any other information added by the Lead Agency.

1.3 Use of the Final Environmental Impact Report

The Final EIR serves as the environmental document to inform the Lead Agency's consideration of approval of the proposed project, either in whole or in part, or one of the alternatives to the project discussed in the Draft EIR.

As required by Section 15090 (a) (1)-(3) of the CEQA Guidelines, a Lead Agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons supporting the action. The Statement of Overriding Considerations shall be supported by substantial evidence in the Lead Agency's administrative record.

1.4 Project Under Review

The proposed project for the development of up to 918 dwelling units, including 668 dwelling units ranging from 4 to 8 dwelling units per acre on approximately 116 acres and 250 dwelling units on 21 acres with a density of 5-12 dwelling units per acre. There would be an option for converting the 1.8 acres of neighborhood commercial to park uses if the 1.8 acres of neighborhood commercial is not adopted as part of the Specific Plan, as well as an option

(Active Adult Option) to develop 768 age-restricted units leaving a maximum of 150 units developed as conventional homes. The allowable densities or maximum number of units and park acreage would not change under this option, only the type of residential unit. A total of up to 15.4 acres in three parks and 44.8 acres in Open Space Preserve and Open Space Buffer. On-site internal roadways, bikeways, pedestrian pathways, utilities and sufficient space for emergency access and evacuation are included as well as off-site infrastructure improvements. Through the consultation process with local tribes, it was revealed tribal cultural resources exist within the project site that would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the Draft EIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. Based on this information, an alternative, the Reduced Impact Alternative (RIA) was developed which avoids impacts to tribal cultural resources and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult (55+ in age).

Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to tribal cultural resources, reduces other environmental impacts, and is the land use plan preferred by the tribes. While the proposed project provides a better economic return from a development perspective, the project applicant has committed to the tribes, County staff, and members of the community that it will support approval of the RIA because it is environmentally superior and addresses the concerns of numerous stakeholders.

1.5 Summary of Text Changes

Chapter 2 of this Final EIR, Changes to the Draft Environmental Impact Report, identifies all changes made to the document by section. These text changes provide additional clarity in response to comments received on the Draft EIR, but do not change the significance of the conclusions presented in the Draft EIR or constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

1.6 Responses to Comments

During the public review period, the County received 8 comment letters on the Draft EIR. The responses to comments appear in Chapter 3, Draft Environmental Impact Report Comments and Responses, of this Final EIR. Each comment letter is presented with brackets indicating how the letter has been divided into individual comments. Each comment letter is lettered and given a binomial with the comment letter appearing first, followed by the comment number (e.g., A-1, A-2, A-3, and so on). Immediately following the letter are responses, each with binomials that correspond to the bracketed comments.

1.7 Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) includes the mitigation measures from the Draft EIR, as revised in Chapter 2 (Changes to the Draft Environmental Impact Report) of this Final EIR, that are applicable to the project to be approved. A copy of the MMRP is included as Appendix E to this Final EIR.

If the County chooses to approve the proposed project or one of the alternatives described in the Draft EIR, then the Board of Supervisors will adopt the MMRP at the same time it adopts its CEQA Findings of Fact and Statement of Overriding Considerations, as required by Section 21081.6 of the Public Resources Code.

1.8 Overview of the Public Participation and Review Process

The County notified all responsible and trustee agencies and all known interested groups, organizations, tribes, and individuals that the Draft EIR was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

- A Notice of Completion was filed with the State Clearinghouse on November 6, 2020, along with copies of the NOP (stating the County's intention to prepare an EIR for the project with the State Clearinghouse for the required 30-day public review period).
- A NOP scoping meeting for the project was held on November 19, 2020.
- A second NOP scoping meeting was held on September 26, 2023.
- A Notice of Availability (NOA) and copies of the Draft EIR were filed with the State Clearinghouse on June 20, 2025, to start a 60-day public review period. The County put a legal notice in the Mountain Democrat that posted on June 20, 2025, and sent out an email on the same day with the NOA attached noticing interested groups, organizations, and individuals regarding the availability of the Draft EIR. A copy of the NOA was delivered to the El Dorado County Clerk's office on June 20, 2025. The public review comment period ended on August 19, 2025.
- An electronic copy of the Draft EIR was available for review on the County's website (https://www.eldoradocounty.ca.gov/Land-Use/Planning-and-Building/Planning-Division/Environmental-Impact-Report-EIR-Documents/Creekside-Village-Specific-Plan-EIR) and a hard copy was made available at the County's Planning and Building Department, 2850 Fairlane Court, Building C, Placerville, CA 95667; and at the El Dorado County Library, 345 Fair Lane, Placerville, CA 95667; El Dorado County Library**,** 7455 Silva Valley Parkway, El Dorado Hills, CA 95762; and the Cameron Park Library, 2500 County Club Drive, Cameron Park, California 95682.

2 Changes to the Draft Environmental Impact Report

This chapter presents minor corrections, additions, and revisions made to the Draft Environmental Impact Report (EIR) initiated by the Lead Agency (County of El Dorado), reviewing agencies, the public, and/or consultants based on their review. New text is shown in underline and deleted text is shown in ~~strikethrough~~, unless otherwise noted in the introduction preceding the text change. Text changes are presented in the section and page order in which they appear in the Draft EIR.

The changes provide clarifications, corrections, or minor revisions of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

Chapter ES, Executive Summary

The first paragraph under Section ES.5, Summary of Environmental Impacts and Mitigation Measures is revised to read:

> Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides an overview of the impact analysis of the proposed project and a summary of environmental impacts (before and after mitigation) resulting from implementation of the project pursuant to CEQA Guidelines Section 15123(b)(1). For a more detailed discussion of project impacts, please see Chapter 3 of this EIR. The analysis of the RIA, as compared to the proposed project, is provided in Chapter 5, Alternatives.

Table ES-1, Summary of Environmental Impact and Mitigation Measures, is revised with the revised mitigation measures detailed below.

Section 3.1, Aesthetics

Impact 3.1-2 on page 3.1-41 is revised to read:

Impact 3.1-2. The proposed project would ~~not~~ substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Section 3.2, Air Quality

Mitigation measure AQ-2 on page 3.2-26 is revised to read:

AQ-2: Prior to the issuance of building permits, the project applicant shall ensure that all initial and ongoing interior and exterior architectural coatings (i.e., paints) associated with the proposed project have no volatile organic compounds (VOCs). A note stating products containing VOCs shall not be allowed shall be provided on the project's Improvement Plans and on the Informational Sheet filed with Final Subdivision Map(s) for review and approval by the El Dorado County Planning and Building Department. Verification of the ongoing use of no VOC architectural coatings shall be ensured in perpetuity by the project's proposed homeowner's association (HOA) and shall be included in the HOA's Conditions, Covenants and Restrictions (CC&Rs).

In addition, a green cleaning product education program shall be made available to all residents and commercial tenants of the proposed project. The program shall include free educational materials such as brochures, pamphlets, checklists, etc., that provide information regarding the proper use of green cleaning products to be provided in information provided by the home buyer or commercial tenant.

The aforementioned requirements shall be noted on the project Improvement Plans, the Conditions, Covenants and Restrictions (CC&Rs), and the Informational Sheet filed with the Final Subdivision Map(s), and submitted for review and approval by the El Dorado County Planning and Building Department.

Section 3.3, Biological Resources

Mitigation measure BIO-1 on page 3.3-30 is revised to read:

BIO-1: Rare Plant Survey. If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary.

~~If avoidance of special status plant species is not feasible, a Rare Plant Salvage and Translocation Plan shall be prepared by a qualified botanist prior to implementation. The Rare Plant Salvage and Translocation Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed; identification of on-site or off-site preservation, restoration, or enhancement locations; methods for preservation, restoration, enhancement, and/or translocation; goals and objectives; replacement ratio and success standard of 1:1 for impacted to established acreage; a monitoring program to ensure mitigation success; and adaptive management and remedial measures in the event that the performance standards are not achieved. If replanting and preservation occurs off-site, the replanting shall occur within existing rare plant preserves within the County that will be maintained in perpetuity.~~ If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation

shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-1), the County Planning ~~Services~~ and Building Department shall verify the survey's completion within 7 days of any ground disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-2 on page 3.3-30 is revised to read:

BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-3 on page 3.3-31 is revised to read:

BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by ~~the resident construction contractor coordinating with~~ a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity

shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans.

Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey.

Mitigation measure BIO-5 on page 3.3-32 is revised to read:

BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the ~~tricolored blackbird and~~ grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction.

Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. ~~The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of grading or construction activities.~~ If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project.

If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-6 on page 3.3-33 is revised to read:

BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall ~~purchase at least 0.30 acres of tricolored blackbird preservation credits (3:1 ratio for 0.10 acres of direct impacts) plus additional preservation credits for permanent disturbance of a breeding colony location if~~ provide mitigation either through the purchase of credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process.

- Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location.
- Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.

Mitigation measure BIO-7 on page 3.3-33 is revised to read:

BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor.

- If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately.

Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be requried for the species.

- If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Pemit ~~(if necessary based on species listing decision)~~ and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements:
  - Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide.
  - If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the proposed project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity.
  - If suitable habitat is not available for conservation adjacent or proximate to the proposed project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW.
  - If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of mitigation measure BIO-7. Per the circumstances described in mitigation measure BIO-7, County

Planning Services shall verify the pre-construction survey's completion per the timing described in the first paragraph of mitigation measure BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.

Mitigation measure BIO-9 on page 3.3-36 is revised to read:

BIO-9: Wetland Compensatory Mitigation. The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. ~~Preservation and creation~~ Compensation may occur offsite through purchasing credits at ~~a~~ USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.

Mitigation measure BIO-10 on page 3.3-36 is revised to read:

BIO-10: Stream Preservation with Park Design. Final design of the park in Lot K shall preserve a minimum of 0.08 acre of the existing intermittent stream that is adjacent to Q Drive and provide a minimum 50-foot no-disturbance buffer (within which no ground disturbance shall occur) on both sides of the 0.08 acre of preserved intermittent stream. The park design shall retain the preservation area as a natural aesthetic feature within the park, but shall not include trails, benches, or other park improvements within the preservation area. Final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey. Periodic upland (outside of intermittent stream banks) vegetation and thatch management to protect the ecological integrity of the stream and comply with El Dorado County Code Chapter 8.09 (Vegetation Management and Defensible Space) shall be performed under the direction of a qualified biologist to ensure no impacts to the intermittent stream. The tentative map shall note the preservation area within Lot K as “stream preservation.”

Section 3.4, Cultural Resources

Mitigation measure CUL-2 on page 3.4-17 is revised to read:

CUL-2: Unanticipated Discovery of a Cultural Resource. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be

immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-~~3~~4 and TCR-4 shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented.

If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.

Mitigation measure CUL-4 starting on page 3-18 is revised to read:

CUL-4: Discovery of Non-Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado County coroner and archaeological monitor shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed.

The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.

Section 3.8, Hydrology and Water Quality

The first sentence in the fourth paragraph on page 3.8-21 is revised to read:

> Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification[1] pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated by the 85th percentile and the 2-year 24-hour storm event in accordance with the Post-Construction Program guidelines.

Section 3.10, Noise

Mitigation measure NOI-2 on page 3.10-35 is revised to read:

NOI-2: Park Activity Noise. ~~The tentative map~~ Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.

Mitigation measure NOI-4 on page 3.10-11 is revised to read:

NOI-4: Exterior Traffic Noise. Any application submitted for a ~~The tentative map submitted for~~ building and/or grading permit~~s~~ shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. To satisfy the General Plan 60 dBA Ldn exterior noise level standard at the backyards of the single-family residential lots proposed nearest to Latrobe Road (within 230 feet from the centerline of Latrobe Road), the construction of solid traffic noise barriers ranging from six to nine feet in height shall be required. Once site plans showing building pad elevations are available, a site-specific noise study shall be completed by a qualified noise consultant in order to determine the overall heights of barriers required at those locations.

It is recommended that the traffic noise barriers shall be either a masonry wall, earthen berm, or combination of the two. Other materials may be acceptable (i.e., wood or wood composite fence with overlapping slat construction) but shall be reviewed by a qualified acoustical consultant prior to receiving building permits.

[1] Hydromodification refers to alterations in natural watershed hydrology associated with changes in land use or cover (e.g., introduction of new impervious surfaces).

Section 3.11, Public Services and Recreation

The text under Impact 3.11-3 is revised to read:

> The project site is also within the Sphere of Influence of the El Dorado Hills CSD. The project identifies the option for the project to apply for annexation to the El Dorado Hills CSD, but that determination has not been made at this time. The El Dorado Hills CSD has a separate level of service requirement of 5.0 acres of parks per 1,000 residents. As of the 2021 Parks and Recreation Facilities Master Plan, the El Dorado Hills CSD provided 9.9 acres of parks per 1,000 residents, exceeding the level of service requirement (El Dorado Hills CSD 2021). While the County is below its level of service standard for parks, the area surrounding the project site exceeds the level of service for parks.
>
> The project is providing sufficient parks to meet the County standard and will fulfill its Quimby parkland dedication requirements. Park acreage for the project is included within the project site and thus environmental impacts from development of this park acreage are analyzed in this document. Development projects are also required to pay development impact fees for park facilities on behalf of the County in order to fund the acquisition and development of parks and recreational facilities needed as a result of new development (General Plan Objective 9.2.2).
>
> The proposed project would include 918 single family dwelling units and approximately 2,314 residents. The project includes 13.6 acres of village and neighborhood parks that would provide basic recreational facilities. The project also includes 9.1 acres of open space preserve with approximately 3 acres of public-access trails; and 35.7 acres of open space buffer throughout the project site. The project includes an option to redesignate the 1.8 acres in neighborhood commercial uses to parkland if the County decides neighborhood commercial is not appropriate for the CVSP. If that were to occur the amount of parkland would increase to 15.4 acres.
>
> Based on the County parkland dedication requirements, the project's service population of 2,570 residents and the County's ratio of 5 acres of parkland per 1,000 residents, the project would require 12.9 acres of parks. The project includes 13.6 acres of parkland and 3 acres of publicly accessible trails, exceeding this standard. The total amount of parkland would increase to 15.4 acres if the neighborhood commercial use is not included. Thus, development of the proposed project would accommodate the project's demand for parks and recreational facilities and would not necessitate the construction of new or expanded parks within the County. As noted above, the area surrounding the project site is not deficient in parks even though the County is not meeting its level of service in other areas within the County.
>
> As previously discussed, the project is within the El Dorado Hills CSD Sphere of Influence and may elect to apply for annexation to the CSD. If the project applicant applies for annexation to the EDH CSD and such annexation is approved by LAFCO, the project would be required to comply with the parkland dedication requirements and policies for the CSD. For the purposes of calculating parkland dedication within the El Dorado Hills CSD, a persons per dwelling unit of 3.3 is assumed (County Code Section 120.12.090(9)(a)). To meet the El Dorado Hills CSD level of service requirement, approximately 15.2 acres of parks would be required under the proposed project. The project could meet the El Dorado Hills CSD standard through consideration of the publicly accessible trails or, alternatively, if the 1.8 acres of neighborhood commercial uses is redesignated to park uses. If the project elects to seek annexation to the El Dorado Hills CSD, the parkland dedication would be "jointly determined" with the CSD consistent with County Code section 120.12.090(A)(2).

Section 3.13, Tribal Cultural Resources

The text on page 3.13-21 under Impact 3.13-2 is revised to read:

Impact 3.13-2. The proposed project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.

As discussed previously, known TCRs~~, including Native American human remains~~ have ~~either~~ been identified on the project site and the area is considered to be of high potential to contain unanticipated TCRs as well as Native American human remains. The project as presently designed would directly impact a known TCR. Given past, present and future development in the County and because all significant TCRs are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base, this is considered a significant cumulative impact.

As discussed in the regulatory setting, numerous laws, regulations, and statutes, on both the federal and state levels, seek to protect TCRs and the unanticipated discovery of Native American human remains. Future projects within the region would also be subject to the same requirements as the proposed project. Technical studies and consultation would be required as part of the due diligence process and would result in the documentation and appropriate consideration of any resources that may be present. Regulations in the region for management of TCRs would apply to development within the County. Cumulative projects may require extensive excavation in culturally sensitive areas and thus may result in adverse effects to known or previously unknown, inadvertently discovered TCRs or Native American human remains. There is the potential for accidental discovery of other TCRs by the proposed project as well as by cumulative projects.

The project's incremental contribution to the cumulative loss of TCRs is considerable. Compliance with existing laws and implementation of project-level mitigation measures TCR-1 through TCR-4, would require investigation and handling by a qualified archaeologist in the event that an unknown resource is encountered. However, because a known TCR would be directly impacted by the project and compliance with mitigation would not reduce the significance of the impact it would be significant and unavoidable. The proposed project would contribute to an existing cumulative impact to TCRs ~~and Native American human remains~~ and the project's cumulative contribution would be considerable resulting in a **significant cumulative contribution**.

Section 3.14, Utilities and Service Systems

The text on page 3.14-4 under Telecommunications is revised to read:

There are several telecommunications services in the project area such as telephone, cable television, and Internet services within the county. There is no current telecommunication infrastructure on the project site. <u>If the project elects to apply for annexation to the El Dorado Hills CSD and such annexation is approved by LAFCO, the CSD would be the administrator of cable television.</u>

The text on page 3.14-4 under Solid Waste is revised to read:

> The project site is located within the El Dorado Disposal service area. El Dorado Disposal provides residential and commercial trash, recycling, and organics collection services, as well as construction and demolition debris collection and recycling for the cities and unincorporated communities within the county (El Dorado County 2012). If the project elects to apply for annexation to the El Dorado Hills CSD and such annexation is approved by LAFCO, the CSD would be the primary provider of recycling and solid waste collection services through its franchise agreement with El Dorado Disposal. As previously described, the project site consists of vacant, undeveloped land. Thus, there are no existing solid waste services provided to the site.

Section 3.15, Wildfire

The text on page 3.15-36 for Impact 3.15-5 is revised to read:

> Impact 3.15-5. Implementation of the proposed project ~~could~~ would not contribute to cumulative impacts on emergency response and evacuation efforts or plans.

Chapter 5, Alternatives

The text on page 5-14 is revised to read:

> This alternative would fail to meet project objectives 1-6 ~~and 9~~ (see Section 5.1 of this chapter) because no residential uses are proposed.

The text on page 5-15 is revised to read:

> Assuming 2.52 persons per household (PPH) for 150 traditional single-family units and a 40% reduction per unit for the remaining 613 age-restricted units, the RIA would result in a total of approximately ~~997~~ 1,305 new residents. Compared to the proposed project, the RIA would have approximately ~~1,317~~ 1,009 fewer new residents than the proposed project with all conventional homes and approximately ~~543~~ 235 fewer new residents than the proposed project with age-restricted units (Active Adult Option).

The text on page 5-20 is revised to read:

> The RIA would develop 155 fewer dwelling units than the proposed project, resulting in approximately ~~543~~ 235 fewer residents than the proposed project under the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-24 is revised to read:

> Compared to the proposed project, the RIA would result in the loss of 0.672 additional acres of protected aquatic resources. Although the RIA would result in a slightly greater loss of aquatic resources, the level of significance would not change. Impacts would be **potentially significant** and mitigation measure BIO-~~8~~9 would still be applicable, the same as the proposed project. Under the proposed project, BIO-~~9~~10 provided for stream preservation with park design, however, with the lotting for the RIA to preserve areas in open space, residential lots were included where the intermittent drainage is and therefore it is no longer part of the park and BIO-~~9~~10 would not be feasible with the RIA.

Mitigation Measures

See Section 3.3 for mitigation measure BIO-~~8~~9. Compliance with mitigation measure BIO-~~8~~9 would require compensation of all waters of the U.S. and state removed by the project to a standard of no net loss. Other cumulative projects would also be expected to meet this mitigation standard. The mitigation measure reduces the **project-level and cumulative-level impact to less-than-significant**, the same as the proposed project.

The text on page 5-25 is revised to read:

Development under the RIA would be less energy-intensive than the proposed project because 155 fewer dwelling units would be constructed than under the proposed project, resulting in approximately ~~543~~ 235 fewer residents with the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-27 is revised to read:

As previously discussed, the RIA would result in approximately ~~543~~ 235 fewer residents than the proposed project under the Active Adult Option or ~~1,317~~ 1,009 fewer residents without the Active Adult Option.

The text on page 5-28 is revised to read:

The RIA proposes a maximum of 763 dwelling units, with 613 age-restricted units and 150 traditional single-family units. As previously discussed, this would result in approximately ~~997~~ 1,305 new residents.

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3 Draft Environmental Impact Report Comments and Responses

This chapter contains the comment letters received in response to the Draft Environmental Impact Report (EIR) for the Creekside Village Specific Plan Project (CVSP or proposed project) during the County's required 60-day public review period. Each comment letter is numbered, each comment is bracketed, and responses are provided to each comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project unrelated to its environmental impacts) are noted for the record. Where tbext changes in the Draft EIR are warranted based on comments received, updated project information, or other information provided by County of El Dorado (County) staff, those changes are provided in Chapter 2, Changes to the Draft Environmental Impact Report, of this Final EIR.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with California Environmental Quality Act (CEQA) Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

CEQA Guidelines Section 15088(a) requires a lead agency to evaluate and provide written responses to comments raising significant environmental issues. Section 15204(a) provides guidance on the focus of review of EIRs as follows:

> In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

In reviewing comments and providing responses on the following pages, Sections 15088(a) and 15204(a) of the CEQA Guidelines are considered. The focus is on providing responses to comments that raise significant environmental issues.

3.1 List of Comment Letters Received

The Draft EIR was published and circulated for review and comment by the public and other interested parties, agencies, and organizations for the County's required 60-day public review period from June 20 through August 19, 2025. Electronic copies of the document were distributed to the State Clearinghouse. A Notice of Availability of the Draft EIR was sent to agencies and interested parties on June 20, 2025. The Draft EIR also was available for public

review on the County's website, at the County's Planning and Building Department and at local libraries, as detailed in Chapter 1, Introduction.

During the public review period, the County received 8 comment letters on the Draft EIR. Six comment letters were received from agencies, and the remaining two letters were received from local organizations or the public (see Table 3-1).

Table 3-1. Comment Letters Received on the Draft Environmental Impact Report

Comment Letter	Commenter	Date
A	California Department of Fish and Wildlife	August 19, 2025
B	Central Valley Regional Water Quality Control Board	August 19, 2025
C	County of El Dorado, Tahoe Planning & Building Division	June 20, 2025
D	El Dorado Hills Community Services District	August 19, 2025
E	Pacific Gas & Electric	July 1, 2025
F	Pacific Gas & Electric	July 1, 2025
G	El Dorado Hills Area Planning Advisory Committee	August 18, 2025
H	Christine Morris	July 10, 2025

3.2 Comments and Responses

Each comment letter is bracketed followed by responses to the comments. As indicated above, Section 15088(a) of the CEQA Guidelines requires a lead agency to evaluate comments on environmental issues and provide written responses to all significant environmental issues. Therefore, the emphasis of the responses is on significant environmental issues raised by the commenters (CEQA Guidelines section 15204[a]). Changes that have been made to the Draft EIR text based on these comments and responses are provided in Chapter 2, Changes to the Draft Environmental Impact Report, of this document.

Comment Letter A

Docusign Envelope ID: 1D36D669-7EE5-4A99-BC6C-990B8B95A4D1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 19, 2025

Cameron Welch, Senior Planner
El Dorado County
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

Subject: Creekside Village Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH No. 2020110052

Dear Cameron Welch,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from El Dorado County for the Creekside Village Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park within an unincorporated area of El Dorado County in the community of El Dorado Hills.

The Project proposes to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist El Dorado County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project. A-1

COMMENT 1: Incidental Take Permit for CESA or NPPA listed Species

Issue: The DEIR identified species that are state-listed as rare, candidate, threatened, or endangered under CESA or NPPA within the project area. CFDW is particularly concerned with project impacts to Boggs Lake hedge-hyssop (*Gratiola heterosepala*), tricolored blackbird (*Agelaius tricolor*), and burrowing owl (*Athene cunicularia*). The DEIR fails to fully analyze impacts to tricolored blackbird (*Agelaius tricolor*) nesting habitat for the life of the project or include sufficient measures to reduce impacts to a less than significant level. The DEIR also fails to fully analyze the potential take of state listed Endangered Boggs Lake hedge-hyssop (*Gratiola heterosepala*) or include sufficient measures for no net loss of the species or its habitat. Therefore, impacts are not reduced to a less than significant level. A-2

Comment Letter A

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Recommendation: CDFW recommends a qualified biologist complete individual biological assessments for all project areas covered under this DEIR. An ITP should be obtained where the Project has the potential to result in take of a species state-listed as rare, candidate, threatened, or endangered under CESA or NPPA, either through construction or over the life of the Project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).). Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, CDFW recommends the PEIR include species specific measures to minimize and fully mitigate the impacts to any state-listed species the Project activities have the potential to take. A-3

COMMENT 2: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: Boggs Lake hedge-hyssop is an annual herb that is State listed as Endangered. Per the DEIR, this species has a moderate potential to occur on the project site based on site and soil conditions. CESA and the Native Plant Protection Act (NPPA) prohibit the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. The DEIR fails to address take of the species and its habitat or analyzing project impacts to habitat fragmentation including increased human activity after project completion. The DEIR should include sufficient measures to reduce impacts to a less than significant level. A-4

Recommendation: CDFW recommends using the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018; Attachment 1), to conduct a minimum of two focused special-status plant surveys prior to construction during the blooming season for special-status plant species that may occur on the project site. Surveys should be spaced a minimum of three (3) weeks apart during the blooming period. Exact survey timing should be determined by a qualified biologist with experience with the species being surveyed. If special-status plants are discovered during these surveys, coordination with CDFW to develop a plan for avoiding project impacts to special-status plants is recommended. The DEIR should cover a range of possibilities for mitigation. The use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species are generally experimental in nature and largely unsuccessful. Therefore, the DEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species. Take of state-listed plants due to Project activities may only be permitted under an appropriate CESA take authorization. Furthermore, please be aware that the County's in-lieu fee program may not meet the full mitigation standard under CESA. A-5

Comment Letter A

Docusign Envelope ID: 1D36D669-7EE5-4A99-BC6C-990B8B95A4D1

COMMENT 3: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: On page 3.3-23, Policy 7.4.2.8 it states, "*Conserve contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the County through a Biological Resource Mitigation Program*." Fragmentation of special status plants can lead to genetic bottlenecking and a loss of genetic diversity. Conserving contiguous blocks of habitat is important to ensure long term species success. The DEIR fails to analyze the cumulative and continued habitat fragmentation of rare plant species habitat.

A-6

Recommendation: CDFW recommends the DEIR analyze continued habitat fragmentation on rare plant species habitat within this Project area. The DEIR should describe avoidance, minimization and mitigation measures to reduce the project's contribution to habitat fragmentation.

COMMENT 4: Section 3.3 Biological Resources; 3.3.1 Impacts to Tricolored Blackbird; page 3.3-28

Issue: Project grading would result in the removal of approximately 0.10-acres of Valley Foothill riparian (e.g., blackberry thicket associated with riparian wetland) that is suitable tricolored blackbird nesting habitat. Indirect human disturbances and noise from construction activities have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Human occupation of the portion of the project site nearest to the nesting colony location after construction is complete could result in disturbance of future nesting colony activities, potentially causing tricolored blackbirds to discontinue use of this nesting habitat.

As stated in the DEIR, only twelve colony locations are known to exist within El Dorado County. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. The project area has known nesting habitat with a recorded tricolored blackbird nesting colony at the project site in 2022, 2023, and 2024. The tricolored blackbird colony was an active breeding colony in 2022 and 2024. The removal of 0.10 acres of Valley Foothill riparian (e.g., blackberry thicket) coupled with the indirect and direct impacts human disturbances and noise from construction have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Take of state-listed species due to Project activities may only be permitted under an appropriate CESA take authorization and is a significant impact.

A-7

Recommendation: CDFW recommends the project avoid suitable habitat onsite, such as the blackberry thicket, to decrease the potential for colony abandonment. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. CDFW recommends the El Dorado County include measures to further avoid

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indirect and direct impacts through fragmentation and habitat removal including but not limited to permanent fencing (with an appropriate buffer), preserved habitat areas, and habitat corridors.

A-7 Cont.

COMMENT 5: Section 3.3 Biological Resources; BIO-5 Tricolored Blackbird; page 3.3-32 and 3.3-33

Issue: Mitigation Measure BIO-5 is not adequate in reducing impacts to tricolored blackbird to a less-than significant level. Construction activities near suitable tricolored blackbird nesting habitat could result in significant impacts to nesting tricolored blackbird through loss of foraging habitat, noise, fugitive dust, human presence, and/or night lighting. Noise from road use, generators, and other equipment may disrupt tricolored blackbird mating calls or songs which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Bayne et al. (2008) found that songbird abundance and density was significantly reduced in areas with high levels of noise. As a result, the nesting bird mitigation measure included in the DEIR does not reduce impacts to tricolored blackbird to less than significant.

A-8

Recommendation: CDFW recommends implementing the following Tricolored Blackbird preconstruction survey measure prior to initiation of construction activities:

Tricolored Blackbird Nesting Survey. Prior to initiation of construction in the project work area and within a ¼-mile of the project work area, a qualified biologist shall conduct protocol-level surveys to evaluate the presence of tricolored blackbird breeding colonies, suitable nesting and foraging habitat. Surveys shall be conducted during the nesting season (March 15 to July 31). If construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. If breeding colonies are found, the foraging behavior of the colony shall also be documented. Many tricolored blackbird breeding colonies expand over time as additional birds are recruited at the edges of established colonies. For this reason, it is important to reassess the extent of a breeding colony before the start of construction activities. If tricolored blackbirds are found, no work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

A-9

COMMENT 6: Section 3.3 Biological Resources; BIO-7 Burrowing Owl Avoidance; page 3.3-33-3.3-34

Issue: Mitigation Measure BIO-7, Burrowing Owl Avoidance, fails to acknowledge that burrowing owl is currently a candidate for listing under CESA. Mitigation Measure BIO-7 currently states "*If this is infeasible, the project applicant shall consult with CDFW to obtain an Incidental Take Permit (if necessary based on species listing decision) and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced.*"

A-10

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Recommendation: CDFW recommends the DEIR reflect burrowing owl candidate status and change Mitigation Measure BIO-7 to "*If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant should consult with CDFW to obtain an Incidental Take Pemit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced if it is still a candidate or has become CESA listed.*" A-10 Cont.

COMMENT 7: Section 1602 of the Fish and Game Code; BIO-9 Wetland Compensatory Mitigation; page 3.3-36

Issue: The DEIR has identified 7 acres of perennial, intermittent, and ephemeral rivers, and other hydrologically connected aquatic features both on and offsite. These identified Project activities will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Impact 3.3-2 does not fully analyze the removal of vegetation within riparian areas and fails to address Section 1602 of the California Fish and Game Code within Mitigation Measure BIO-9. The DEIR should include measures to reduce impacts to aquatic features including obtaining a Streambed Alteration Agreement to bring project impacts a less than significant level. A-11

Recommendation: The DEIR should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less than significant level including but not limited to Project impacts to water temperature, water nutrient concentrations, and turbidity. A-12

The DEIR has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently proposed in the DEIR will require a LSA Agreement. A LSA Agreement will include measures necessary to protect existing fish and wildlife resources. A-13

CDFW's issuance of a LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, the DEIR should

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fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

A-13 Cont.

COMMENT 8: 3.3 Biological Resources; BIO-10 Stream Preservation with Park Design; Page 3.3-37

Issue: The DEIR states the final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Certain fence designs can inadvertently trap wildlife and would be considered a significant impact unless sufficient avoidance and minimization measures are incorporated into the DEIR.

Recommendation: CDFW recommends the DEIR consider capping all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any of u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the Project to prevent the entrapment of wildlife, especially birds of prey. When animals collide or tangle in fences they can be injured or killed. By tailoring fence design and placement, you can prevent wildlife injuries. CDFW recommends using "A Landowner's Guide to Fences and Wildlife" (2012, Attachment 2) to construct and modify your fencing and crossings to be friendlier to wildlife while still meeting fencing needs. A Biologist should check fence posts, signs, or vertical poles for this requirement at the completion of the Project.

A-14

COMMENT 9: 3.3 Biological Resources; BIO-3 Work Area Delineation and Fencing; page 3.3-31

Issue: Mitigation Measure BIO-3 states "*The exact location of the fencing shall be determined by the resident construction contractor coordinating with a qualified biologist*." A qualified biologist should be consulted and onsite during all fencing activities before the start of construction and grading. Buffers should not be determined by construction contractors.

Recommendation: Before any site clearing, grading or other ground disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. A qualified biologist experienced with the native flora and fauna of the project site should oversee establishing buffers for species on site.

CDFW recommends the following sentence be changed "*The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor.*" The fencing should also be checked regularly and maintained by a qualified biologist until all construction is complete.

A-15

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COMMENT 10: 3.3 Biological Resources; BIO-2 Environmental Awareness Training; page 3.3-30

Issue: Mitigation Measure BIO-2 fails to acknowledge multiple construction years and between construction years new personnel may be added to the project as well prolonged times between construction years.

Recommendation: Construction personnel should have refresher and introductory Environmental Awareness Training as needed and appropriate. CDFW recommends that BIO-2 be changed to read as the following:

"*Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work.*"

A-16

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

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CDFW appreciates the opportunity to comment on the DEIR for the Creekside Village Specific Plan to assist El Dorado County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswalt, Environmental Scientist at (916) 358-4315 or caitlyn.oswalt@wildlife.ca.gov.

A-18

Sincerely,

DocuSigned by:
Morgan Kilgour
C3A86764C0AD4F6...

Morgan Kilgour
Regional Manager

Attachments

1. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

2. Paige, C. 2012. A Landowner's Guide to Fences and Wildlife: Practical Tips to Make Your Fences Wildlife Friendly. Wyoming Land Trust, Pinedale, WY. 52 pp.

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)
Caitlyn Oswalt, Environmental Scientist
Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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REFERENCES

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

Patricelli, G. L., and J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment.

Halfwerk, W., L. J. M. Holleman, C. M. Lessels, and H. Slabbekoorn. 2011. Negative impact of traffic noise on avian reproductive success. Journal of Applied Ecology

Bayne, E. M., L. Habib, and S. Boutin. 2008. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. Conservation Biology

Response to Comment Letter A

Morgan Kilgour, Regional Manager
California Department of Fish and Wildlife

A-1 The comment introduces comments from the California Department of Fish and Wildlife (CDFW) and recommendations for the proposed project.

A-2 The comment expresses concern with project impacts to Boggs Lake hedge-hyssop, tricolored blackbird, and burrowing owl. See Response to Comments A-4 through A-10 which provide responses to specific CDFW comments regarding potential impacts and appropriate mitigation measures. In many instances the CDFW recommendations have been incorporated into the project's mitigation measures, ensuring that impacts are reduced to a less than significant level.

A-3 The comment recommends a qualified biologist complete biological assessments for all project areas and that an Incidental Take Permit (ITP) be obtained where the project has potential to result in take of species listed as rare, candidate, threatened, or endangered under the California Endangered Species Act (CESA) or the Native Plant Protection Act, or that otherwise meet the definition of rare or endangered under CEQA (Cal. Code Regs., tit. 14, § 15380, subd.). See responses A-4 through A-10. The Draft EIR specifies that a CDFW ITP would be required if impacts on the tricolored blackbird are unavoidable, or if burrowing owls are present, and could be impacted by the project (Page 3-3-28). Response to Comments A-4, A-5, and A-6, provide revisions to the project's mitigation measures and recognize that if, in the unlikely event, take of a CESA-listed plant (such as Boggs Lake hedge-hyssop) is required, then a CDFW ITP would be necessary, and compensatory mitigation would be necessary to reduce impacts to less than significant level. In addition, Response to Comments A-7, A-8, and A-9 provide additional information regarding potential impacts on tricolored blackbirds and provide revisions to corresponding mitigation measures. Response to Comment A-10 includes reference to, and the need for, a CDFW ITP for burrowing owls if present and take is not avoidable. As referenced in the CDFW comment, the threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). Thus, in addition to the revised CEQA mitigation measures, additional measures may be necessary as part of the CDFW ITP process.

A-4 The comment states that the Draft EIR fails to address impacts on Boggs Lake edge-hyssop and its habitat. The Draft EIR acknowledges that Boggs Lake hedge-hyssop is state listed as endangered (page 3.3-12), has a moderate potential to occur based on habitat (including site and soil conditions) (page 3.3- 12), and generally describes CESA (page 3.3-19). Boggs Lake hedge-hyssop is not listed under the Native Plant Protection Act. The Draft EIR addresses the potential for take of Boggs Lake hedge-hyssop by reporting and including the results of a botanical survey conducted pursuant to CDFW recommended protocols (see also Response to Comment A-5 below) (page 3.3-26 and Draft EIR Appendix C). Boggs Lake hedge-hyssop was not found during the botanical survey conducted during the evident and identifiable period (Draft EIR Appendix C). The Draft EIR notes that Boggs Lake hedge-hyssop was not observed during earlier reconnaissance surveys (2019–2021; page 3.3-26). Based on the results of the botanical survey and reconnaissance surveys, no take of Boggs Lake hedge-hyssop would occur.

The Draft EIR identifies the potential for Boggs Lake hedge-hyssop to become established prior to Project development (page 3.3-26) and thereby result in an impact or take. The potential of Boggs Lake hedge-hyssop to colonize the site is small. There are no records of Boggs Lake hedge-hyssop in the

California Natural Diversity Database or the Consortium of California Herbaria in El Dorado County. The California Native Plant Society Rare Plant Inventory does not list El Dorado County within the distribution area. Boggs Lake hedge-hyssop has been found in Sacramento County, and the project is near the El Dorado County boundary. The nearest record is approximately 5 miles west in vernal pools. Regional records end approximately at the edge of the Central Valley. The project site does contain several vernal pools and seasonal wetlands with similar hydrology, but lacks the larger vernal pool complexes in the Central Valley where most records of Boggs Lake hedge-hyssop have been recorded. Hence, the project is near the edge of, and possibly beyond, the natural range of Boggs Lake hedge-hyssop. Based on the location of the project, the pattern of known occurrences, and the unlikeliness of rare-plant colonization events in general, the likelihood of Boggs Lake hedge-hyssop becoming established at the site prior to construction is small.

Nevertheless, the Draft EIR did not fail to address take of Boggs Lake hedge-hyssop. Rather, the Draft EIR concluded that the small chance of a colonization event, or the chance that Boggs Lake hedge-hyssop was not found during the botanical survey due to low precipitation in the survey year (page 3.3-26), could mean that the species would be present at the site prior to development, and concluded that a potentially significant impact was present and take could occur. Mitigation Measure BIO-1 requires an additional botanical survey during the appropriate blooming period and replacement of impacted acreage to at least a 1:1 ratio. If Boggs Lake hedge-hyssop were found after another botanical survey and the Project would result in take, then an ITP from CDFW would be required. The threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). Mitigation Measure BIO-1 did not specifically require CDFW authorization in the event Boggs Lake hedge-hyssop is found in the future. Thus, the following sentence is added to the end of the second paragraph of mitigation measure BIO-1:

> "<u>If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset.</u>"

The project is near, and possibly beyond, the natural or existing range of Boggs Lake hedge-hyssop. The project is bound by existing development on three sides. The project will not fragment habitat for Boggs Lake hedge-hyssop because of the pattern of existing development and the lack of any records to the east of the site.

A-5 The comment includes recommendations for special-status plant surveys and mitigation for special-status plant species. The botanical survey conducted in 2022 and included in the Draft EIR (Draft EIR Appendix C) was conducted according to the *CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*, as recommended by the comment. Implementation of mitigation measure BIO-1 would result in a second botanical survey. Mitigation measure BIO-1 generally describes the requirements of the CDFW protocols but does not specifically name them. CDFW's comment appears to request two botanical surveys during the same year and blooming season. Revisions to mitigation measure BIO-1 below more explicitly allow a wider range of

restoration, conservation, and/or preservation activities. The requirement for off-site replanting or preservation in the existing rare plant preserves in El Dorado County has been removed. The County is a partner in the Pine Hill Preserve, and owns land that is part of the Preserve, but the Pine Hill Preserve contains habitat specific to the Pine Hill Plants and is generally not suitable habitat for Boggs Lake hedge-hyssop or other special-status plants with potential to occur in the Project. The County's rare plant in-lieu fee, which also pertains to the Pine Hill Plants, was not and is not used for mitigation.

CESA authorization was discussed above under Response to Comment A-4. The following revisions to the mitigation measure BIO-1 are recommended:

> "…. a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the preconstruction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged."
>
> "~~If avoidance of special status plant species is not feasible, a Rare Plant Salvage and Translocation Plan shall be prepared by a qualified botanist prior to implementation. The Rare Plant Salvage and Translocation Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed; identification of on-site or off-site preservation, restoration, or enhancement locations; methods for preservation, restoration, enhancement, and/or translocation; goals and objectives; replacement ratio and success standard of 1:1 for impacted to established acreage; a monitoring program to ensure mitigation success; and adaptive management and remedial measures in the event that the performance standards are not achieved. If replanting and preservation occurs off site, the replanting shall occur within existing rare plant preserves within the County that will be maintained in perpetuity.~~"
>
> "If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement."

A-6 The comment references Policy 7.4.2.8 of the County's General Plan and states that the Draft EIR fails to analyze habitat fragmentation of rare plant species. Policy 7.4.2.8 was summarized on page 3.3-23 of the Draft EIR for brevity. The full policy is available on the County website and is over three pages long. Additional language in the full policy identifies "habitats that support special status species", among other resources, as the important habitat to be conserved. Per Response to Comment A-4 above, a botanical survey has been conducted according to CDFW protocols and no special status plants were found. Large-scale impacts, including habitat loss and fragmentation, were analyzed for the entire County when the Conservation and Open Space element of the County General Plan was

updated in 2017. Nothing in the biological technical reports for this project would change the 2017 conclusions, in part because there were no new occurrences of special status plants found on the project site.

Similarly to the Response to Comment A-4, the project is bounded by existing development on three sides. The project will not fragment habitat for Boggs Lake hedge-hyssop because of the pattern of existing development and the lack of any records to the east of the site.

A-7 The comment is concerned with impacts to tricolored blackbird nesting habitat, including blackberry thicket associated with riparian wetland. The property contains approximately 0.83 acres of nesting habitat. The project design has avoided impacts to most of the nesting habitat for tricolored blackbird. However, both the proposed project and the Reduced Impact Alternative (RIA) result in some loss of tricolored blackbird nesting habitat. As described in the Draft EIR, the proposed project results in direct impacts to a single nesting habitat feature. The direct impacts would occur to over half of the suitable habitat; therefore, approximately 0.10 acres of nesting habitat could become unsuitable for the species, and tricolored blackbirds could abandon this feature.

As discussed on page 5-29 of the Draft EIR, the RIA was developed with substantial input from consulting Tribes to reduce impacts to Tribal Cultural Resources (TCRs). This alternative would preserve open spaces in areas containing known TCRs, and the RIA would avoid the significant and avoidable impacts to known TCRs that would occur under the proposed project. While the RIA avoided impacts to TCRs, impacts on tricolored blackbird nesting habitat would increase under this alternative. Under the RIA, approximately 0.22 acres of tricolored blackbird nesting habitat would be impacted. These impacts would be dispersed over several locations nesting habitat feature areas. Indirect impacts under the RIA may also occur to these nesting habitats in a similar fashion as described for the proposed project.

The Draft EIR discloses the potential impacts on the colony and discloses the project could cause colony abandonment and death of young or loss of reproductive success during nesting season and could result in tricolored blackbirds discontinuing use of this nesting habitat during project construction or operation. As described in the Draft EIR (mitigation measure BIO-6), if these impacts are unavoidable, an ITP from CDFW will be required, and all impacts will be fully mitigated, which would include measures to avoid, minimize, and mitigate for the take of the colony. The threshold for CDFW issuance of an ITP (fully mitigate) is higher than the threshold for CEQA (mitigate to less than significant). As stated in the Draft EIR (p. 3.3-28), measures in the ITP may go beyond those required by CEQA. The following changes to mitigation measure BIO-6 are included to better align with CDFW ITP requirements and compensatory mitigation options:

> BIO-6: Tricolored Blackbird Compensatory Mitigation. <u>If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit.</u> The project applicant <u>shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands.</u> ~~At least 0.30 acres of tricolored blackbird preservation (3:1 ratio for 0.10 acres of direct impacts) plus additional preservation credits for permanent disturbance of a breeding colony location if~~

Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process.

- Conservation Bank Credits: Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location.
- Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW."

A-8 The comment claims that mitigation measure BIO-5 is not adequate to reduce impacts to tricolored blackbird. Mitigation measure BIO-5 addresses indirect impacts during construction, including noise, dust, human presence and lighting, on nesting birds, including tricolored blackbird, by applying a protective buffer up to 300 feet during construction near active nests. Within this buffer, all construction activity, including traffic, would be avoided. If the nesting colony is active at time of construction, this measure would apply, in accordance with CDFW guidance (2015). However, because the project anticipates potential colony abandonment, mitigation measure BIO-6 includes compensatory mitigation as part of the CDFW ITP for permanent loss of suitable nesting habitat and potential loss of the tricolored blackbird nesting colony.

A-9 The comment recommends implementing a mitigation measure for tricolored blackbird preconstruction surveys. Mitigation measure BIO-5 includes preconstruction surveys for nesting birds, including tricolored blackbird. The 0.25-mile survey radius for tricolored blackbird would encompass the entire riparian wetland feature in the northwestern portion of the project site with its recorded nesting tricolored blackbird colony, as well as other wetland and grassland features with suitable nesting habitat within the project site. The following revisions to mitigation measure BIO-5 are proposed to align with CDFW's recommendations:

"Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the ~~tricolored blackbird and~~ grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction.

Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. ~~The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of grading or construction activities.~~ If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project.

If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance, schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated.

If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming.

Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans."

A-10 The comment states that mitigation measure BIO-7 fails to acknowledge that burrowing owl is a candidate for listing under CESA. The suggested language will be incorporated into mitigation measure BIO-7 as follows:

"If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Permit ~~(if necessary based on species listing decision)~~ and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed."

A-11 The comment states that Impact 3.3-2 in the Draft EIR does not fully analyze the removal of vegetation within riparian areas, and mitigation measure BIO-9 and fails to address Section 1602 of the California Fish and Game Code.

Impact 3.3-2 in the Draft EIR states that project grading would remove approximately 0.10 acres of riparian habitat consisting of Goodding's willow and blackberry. Removal of vegetation within riparian areas, or any disturbance to the bed, bank, and/or channel would require authorization from CDFW in the form of a Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and

Game Code. Mitigation measure BIO-9 states that the amount of mitigation will be determined in consultation with CDFW during the regulatory permitting process (i.e. Streambed Alteration Agreement). Thus, no revisions are necessary in response to this comment.

A-12 The comment recommends that the Draft EIR include measures to reduce impacts to aquatic features to less than significant. Section 3.8 of the Draft EIR includes a requirement for the proposed Project to comply with the National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2021-0057 DWQ, NPDES No CAS000002). The Notice of Intent will include a Stormwater Pollution Prevention Plan (SWPPP). The performance standard in the Construction General Permit is that dischargers shall minimize or prevent pollutants in stormwater discharges and authorized non-stormwater discharges through the use of controls, structures, and best management practices. The SWPPP will include a construction monitoring program. Thus, through compliance with NPDES regulations, the project would avoid and minimize impacts on water quality.

A-13 The comment identifies project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code and states that the project as proposed in the Draft EIR would require a Lake and Streambed Alteration Agreement. The Draft EIR provides a summary of the California Fish and Game Code (Page 3.3-20) consistent with the CDFW's comment. It is noted that CDFW jurisdiction includes features that are episodic, and the Draft EIR acknowledges that tributaries to Carson Creek within the Project site would be subject to CDFW jurisdiction. The Draft EIR also provides a description of aquatic resources on site including intermittent drainages and ephemeral drainages. Mitigation measure BIO-9 acknowledges the need for CDFW authorization as part of the Wetland Compensatory Mitigation requirements. It is also noted that a Lake and Streambed Alteration Agreement will include measures to protect existing fish and wildlife resources beyond those included in the Draft EIR. The following revisions have been made to Mitigation Measure BIO-9 to provide additional flexibility and satisfy regulatory requirements:

> "Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. ~~Preservation and creation~~ Compensation may occur offsite through purchasing credits at ~~a~~ USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset."

A-14 The comment recommends fence capping to prevent entrapment of wildlife. Mitigation measures BIO-3 (p.3.3-31; see also Response A-15 below) and BIO-10 (p.3.3-37) are modified to add the following language:

> "Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey."

A-15 The comment states that a qualified biologist should be consulted for fencing activities, and that buffers should not be determined by construction contractors. Mitigation measure BIO-3 (p.3.3-31) is modified as follows to address this comment:

> "Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by ~~the resident construction contractor coordinating with~~ a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans.
>
> Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey."

A-16 The comment recommends for construction personnel to have refresher Environmental Awareness Training as needed and appropriate. Mitigation Measure BIO-2 (p.3.3-30) is modified as follows to address this comment:

> "Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work."

A-17 The comment is a request for written notification of proposed actions and pending decisions regarding the proposed project. The comment is noted, and CDFW will be notified of project actions and decisions.

A-18 The comment is a conclusion to the comment letter, and no response is needed.

Comment Letter B

California Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for Environmental Protection

Central Valley Regional Water Quality Control Board

19 August 2025

Cameron Welch
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CREEKSIDE VILLAGE SPECIFIC PLAN, SCH#2020110052, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 20 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Creekside Village Specific Plan, 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.

B-1

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.

B-1 Cont.

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:

Comment Letter B

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

B-1 Cont.

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 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

[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.

Comment Letter B

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

B-1 Cont.

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

Comment Letter B

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

B-1 Cont.

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) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

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

Tony Gon
Winn Communities
Tony@winncommunities.com

Angelica Chiu
Dudek
achiu@dudek.com

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Response to Comment Letter B

Peter G. Minkel, Engineering Geologist
Central Valley Regional Water Quality Control Board

B-1 The comment provides standard information on guidance and permits issued by the Central Valley Regional Water Quality Control Board. The regulatory setting for water quality is presented in Section 3.8.2 of the Draft EIR, and potential permitting actions by the Board are identified in Section 2.4, Project Description. The comment is noted and no further response is required.

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Comment Letter C

From: Amy A. Phillips
To: Cameron W. Welch
Cc: Justin M. Ward
Subject: Fw: NOA for the Creekside Village Specific project DEIR
Date: Friday, June 20, 2025 12:00:01 PM
Attachments: NOA CVSP 6-20-2025.pdf

Hi Cameron,

Although the EIR does address County water quality comments, I do have one edit to page 3.8-21 in **red** below:

Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification5 pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated **by the 85th percentile 24-hour and the 2-year 24-hour storm events** in accordance with the Post-Construction Program guidelines.

C-1

Thank you,

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator - West Slope

County of El Dorado
Tahoe Planning & Building Division
2850 Fairlane Court, Placerville, CA 95667
(530) 621-5921
amy.phillips@edcgov.us

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 20, 2025 8:21 AM
Subject: NOA for the Creekside Village Specific project DEIR

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed

at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed."

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Response to Comment Letter C

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator – West Slope
County of El Dorado Tahoe Planning and Building Division

C-1 The comment notes a clarification to text in Section 3.8, Hydrology and Water Quality. The requested clarification is included in Chapter 2, Changes to the Draft Environmental Impact Report. No further response is required.

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Comment Letter D

EL DORADO HILLS
COMMUNITY SERVICES DISTRICT

August 19, 2025

El Dorado County Planning and Building Department
Attn: Cameron Welch
2850 Fairlane Court
Placerville, CA 95667
creeksidevillagesp@edcgov.us

RE: **Creekside Village Specific Plan Draft EIR**

Dear Mr. Welch,

The El Dorado Hills Community Services District ("District") appreciates this opportunity to participate and submit information to help inform the Creekside Village Specific Plan (CVSP) Draft EIR (DEIR) process. Below are the District's comments submitted to be addressed in the Final EIR.

PARKLAND DEDICATION & DEVELOPMENT STANDARDS (POLICY #6110)

All subdividers of land within the District's jurisdiction shall dedicate park land suitable for active recreation use, or pay fees in-lieu thereof, or by District Board authorization, follow a combination of these alternatives. Dedication amounts shall be determined as a result of calculation based on the legislated rate of 5 acres per 1000 population project yield. Population per dwelling unit is specified in the County Subdivision Ordinance and is calculated at the rate of 3.3 persons for single family subdivisions and 2.1 for multi-family subdivisions on a per parcel basis (Pol. 6110.10). D-1

The DEIR identifies up to 918 single family units or 763 single family units in the "Reduced Impact Alternative" which would yield 3,029 and 2,518 future residents respectively based on the County ordinance population yield of 3.3 persons per household in El Dorado Hills. The CVSP identifies a total of 11.94 acres of village and neighborhood parks, and potentially up to 15.4 acres. The identified acres of parkland could meet the District's needs and requirements for parkland dedication. However, Board of Directors' approval is required for any parkland dedication agreement. D-2

DRAFT EIR CHAPTER COMMENTS

Chapter 3 Environmental Analysis

Impact 3.11-3

- The narrative identifies parkland dedication requirements if the development were to happen in El Dorado County outside the District boundary. However, a Specific Plan proposed within the District's Sphere of Influence (SOI) may be conditioned to annex into the District's boundary. The DEIR narrative in this section should contemplate the difference in parkland dedication required within the District boundary. D-3

Creekside Village Specific Plan DEIR p2

Chapter 3.14 Utilities and Service Systems

- The District is the primary provider of Recycling & Solid Waste Collection and Communications (Cable TV). The DEIR narrative in this section should contemplate the District as the administrator of these utilities and services if within the District boundary.

D-4

OTHER DISTRICT SERVICES

The District is also the primary provider of Covenants, Conditions, & Restrictions (CC&Rs), and Design Review/Architectural Control services. Should the CVSP require CC&R and/or Design Review services, the applicant shall work with the District.

The District looks forward to the future park and recreation facilities as part of the CVSP. Should you have any questions or comments regarding the concerns expressed in this letter, please contact me at (916) 614-3214 or jkernen@edhcsd.org

D-5

Best regards,

Jeff Kernen

Jeff Kernen
Principal Planner
El Dorado Hills Community Services District

Response to Comment Letter D

Jeff Kernen, Principal Planner
El Dorado Hills Community Services District

D-1 The comment outlines the El Dorado Hills Community Service District (El Dorado Hills CSD) requirements for parkland in the CSD.

The Draft EIR notes under Impact 3.11-3 starting on page 3.11-20, the project site is within the Sphere of Influence of the El Dorado CSD and the CSD has a different level of service requirement for number of acres of parkland per 1,000 residents than the County. It has not been determined yet if the project will request an annexation into the El Dorado CSD. If the project is annexed into the CSD it would comply with the CSD requirements for the dedication of land and/or payment of in-lieu fees.

D-2 The comment notes the number of acres of parkland the project would provide and indicates this could meet the El Dorado Hills CSD requirements for parkland dedication. The comment uses a persons per household (PPH) of 3.3 to calculate the number of residents under both the proposed project and the Active Adult option which differs from the County's PPH of 2.52. The comment concludes the CSD Board of Directors' would have to approve any parkland dedication if requested by the project. The comment is noted and no further response is required.

D-3 The comment clarifies that a Specific Plan may be conditioned to annex into the El Dorado Hills CSD and requests the Draft EIR be revised to include the CSD's parkland requirements.

The Draft EIR is revised to include the required parkland dedication if the project is annexed into the El Dorado Hills CSD based on their PPH requirements. Please see Chapter 2, Changes to the Draft EIR for the revised text.

D-4 The comment notes the El Dorado Hills CSD also provides recycling and solid waste collection in addition to cable television and requests the text of the Draft EIR be revised to include these services if the project annexes into the CSD.

The Draft EIR is revised to identify these services if the project applicant elects to apply for annexation to the CSD and the annexation is approved. Please see Chapter 2, Changes to the Draft EIR for the revised text.

D-5 The comment clarifies the El Dorado Hills CSD is the primary provider of covenants, conditions, and restrictions and also Design Review and Architectural Control Services, should the project require these services. The additional information on these potentially available services in the event the applicant elects annexation to the CSD is noted and no further response is required.

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Comment Letter E

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

July 1, 2025

County of El Dorado
Planning and Building Dept.
2850 Fairlane Court
Placerville, CA 95667

Ref: Gas and Electric Transmission and Distribution

Dear El Dorado County Planning,

Thank you for submitting the **Creekside Village Specific** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

E-1

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

E-2

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

E-3

Sincerely,

Pacific Gas and Electric Company

Plan Review Team
Land Management

Page 2 of 7 in Comment Letter E

Pacific Gas and Electric Company

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

Pacific Gas and Electric Company

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

Pacific Gas and Electric Company

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Pacific Gas and Electric Company

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

Pacific Gas and Electric Company

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

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Response to Comment Letter E

Pacific Gas and Electric Company
Plan Review Team – Land Management

E-1 The comment provides standard information on Pacific Gas and Electric Company (PG&E) plan review process. The comment is noted and no further response is required.

E-2 The comment provides information on any proposed uses within a PG&E fee strip or easement. The comment is noted and no further response is required.

E-3 The comment states this letter does not constitute PG&E's consent to use any portion of its easement and PG&E will address any requested changes to use of its easement if needed. The comment is noted and no further response is required.

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Comment Letter F

From: PGE Plan Review
To: CreeksideVillageSP
Subject: RE: Creekside Village Specific Project DEIR
Date: Tuesday, July 1, 2025 10:49:09 AM
Attachments: image001.png
Initial_Response_Letter_[07012025].pdf

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Classification: Internal

Dear El Dorado County Planning,

Thank you for submitting **Creekside Village Specific** project plans. The PG&E Plan Review Team is currently reviewing the information provided. If the project has the potential to interfere with PG&E's facilities, we will provide project-specific comments in response.

Attached, you will find general guidelines regarding work near PG&E facilities and land rights. Please ensure compliance with these requirements when conducting work in proximity to PG&E's infrastructure.

Please note that this email and its attachment do not constitute PG&E's consent to utilize any portion of PG&E's land rights for purposes not previously granted. If there are any modifications to your design, we kindly request that you resubmit the revised plans to the email address listed below to ensure accurate review and assessment.

F-1

Should you have any questions regarding our review process or require further clarification, please do not hesitate to contact the PG&E Plan Review Team at **pgeplanreview@pge.com**.

Thank you for your cooperation. We appreciate the opportunity to assist.

Best regards,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 27, 2025 11:00 AM
Subject: Creekside Village Specific Project DEIR

CAUTION: EXTERNAL SENDER!

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the

Comment Letter F

Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed.

Comment Letter F

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You can read about PG&E's data privacy practices at PGE.com/privacy.

Response to Comment Letter F

Pacific Gas and Electric Company
Plan Review Team

F-1 The comment notes that the Pacific Gas and Electric Company (PG&E) Plan Review Team is reviewing the project and will provide any project-specific comments (see Letter E). The letter includes PG&E's general guidelines for work in proximity to PG&E infrastructure. Lastly, the letter requests any revised plans be submitted to PG&E for review. The comment is noted and no further response is required.

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Comment Letter G

El Dorado Hills Area Planning Advisory Committee https://edhapac.org

"Non-Partisan Volunteers Planning Our Future Since 1981" 1021 Harvard Way, El Dorado Hills, CA 95762

APAC 2025 Officers

John Davey, Chair jdavey@daveygroup.net
John Raslear, Vice Chair jjrazzpub@sbcglobal.net
Timothy White, Vice Chair tjwhitejd@gmail.com
Brooke Washburn, Vice Chair Washburn_bew@yahoo.com
Bill Jamaca, Secretary bjamaca@gmail.com

Monday August 18, 2025
El Dorado County Planning & Building Department
2850 Fairlane Court, Placerville, CA 95667
ATTN: Cameron Welch

RE: Creekside Village Specific Plan DRAFT Environmental Impact Report
GPA20-0001, Z20-0005, SP20-0001, TM20-0002

The El Dorado HIlls Area Planning Advisory Committee (EDH APAC) would like to offer the following public comments on the Creekside Village Specific Plan DRAFT Environmental Impact Report.

EDH APAC has experienced a tremendous amount of engagement and outreach from the project applicant, beginning as far back as 2018. In the past several years this has also included numerous meetings, discussions, and communications with EDH APAC officers, our Standing Transportation and Environmental Committees, and several public discussions at EDH APAC meetings attended by community members.

EDH APAC would request that as the project moves forward towards entitlements and approvals, that any Conditions of Approval be required to have identified and enforceable timelines, and oversight management in place.

In these DEIR Comments below, "EDH APAC" refers to our Creekside Village Specific Plan subcommittee volunteers.

General Comments

- EDH APAC would like to acknowledge the positive relationship with the applicant.
- EDH APAC finds **preference for Alternative 3: Reduced Impact Alternative** and its alignment with the community's goals for a less dense, less impactful development.
- EDH APAC commends the applicant for the inclusion of a significant amount of open space and parks, which is a positive feature of the plan.

G-1

Specific Concerns and Clarifications

1. Density and Unit Count

- **Concern:** The Executive Summary mentions "up to 918 dwelling units," but it's not clear how this number aligns with Alternative 3, which is the preferred option. The provided text only describes the overall project and not the alternative.
- **Comment:** The committee supports the less dense Alternative 3 but notes that the Executive Summary focuses on the maximum 918-unit count. We recommend that the Executive Summary be revised to clearly state the preferred alternative and its corresponding unit count to avoid confusion. For the purpose of the Draft EIR, the committee's comments are based on the assumption that the project will proceed with the reduced density and unit count of Alternative 3. G-2

2. Neighborhood Commercial vs. Park Uses

- **Concern:** The plan includes a 1.8-acre neighborhood commercial option that can be converted to a park. This is a significant point of flexibility but also a potential point of uncertainty.
- **Comment:** The option to convert the 1.8 acres of neighborhood commercial to park uses is a positive feature. EDH APAC would appreciate a more detailed explanation of the decision-making process for this conversion. What specific triggers or criteria would be used to determine if the commercial space is not needed, and what is the timeline for making that decision? We would prefer that this land be designated for park use from the beginning to ensure maximum open space. G-3

3. Active Adult Option

- **Concern:** The "Active Adult Option" allows for a significant change in the type of units (age-restricted vs. conventional) but doesn't change the total number of units or park acreage. This could have different impacts on services, traffic, and community demographics.
- **Comment:** The Active Adult Option introduces a different demographic with potentially different service and amenity needs. While the total number of units and park acreage remain the same, EDH APAC is interested in seeing a more in-depth analysis of the potential impacts of this option on local services, such as emergency services (e.g., medical calls) and traffic patterns. G-4

4. Open Space and Preservation

- **Concern:** The plan designates a significant amount of open space, but it also differentiates between "Open Space Preserve" and "Open Space Buffer," with different use restrictions.
- **Comment:** The commitment to 44.8 acres of open space is highly significant. However, the distinction between 'Open Space Preserve' and 'Open Space Buffer' with different use restrictions requires careful consideration. EDH APAC recommends a clear and enforceable plan for the long-term maintenance and management of both areas. We're particularly interested in knowing how the use of multi-use trails in the Open Space G-5

Buffer will be managed to protect sensitive natural features while allowing for passive recreation.

G-5 Cont.

5. Off-site Improvements

- **Concern:** The document mentions off-site infrastructure improvements but lacks specific details on which roadways will be improved and what the timeline and funding sources for these improvements are.
- **Comment:** The plan mentions off-site roadway improvements, but it lacks specific details. EDH APAC would like to see a more detailed list of the proposed off-site roadway improvements, including specific locations, scope of work, and a timeline for completion. Additionally, a clear explanation of the funding mechanisms and responsible parties for these improvements is necessary to ensure they are completed in a timely manner and do not create unforeseen burdens on the County or existing residents. Allowing offsite improvements to fall to the twenty-year horizon of the County's CIP program is essentially planning NOT to implement these off-site roadway improvements. The improvements should at least be created concurrently with the buildout of the project.

G-6

Summary of Recommendations

EDH APAC would suggest considering the preferred Alternative 3. With this said, we would also request additional clarity and detail on the following key areas:

- **Clarity on the chosen alternative** (Alternative 3) in the Executive Summary.
- **A defined process** for the 1.8-acre neighborhood commercial to park conversion.
- **An updated analysis of the specific impacts** of the Active Adult Option on local services and traffic.
- **A robust, long-term management plan** for the differentiated Open Space Preserve and Buffer areas.
- **Detailed information** on the scope, funding, and timeline for all necessary off-site infrastructure improvements.

G-7

General Observations

- The objectives are broad and largely aspirational, which is common for a project of this nature.
- The objectives emphasize positive aspects like walkability, connectivity, and open space, which aligns with EDH APAC's general support.
- A key theme is **flexibility**, which, while useful for the developer, can create uncertainty for the community and for environmental analysis.

Specific Concerns and Clarifications

1. Compatibility with Existing Communities (Objective 2)

- **Concern:** Objective 2 states the project will "allow for development of land uses more compatible with the surrounding residential communities." This is a key objective, but the **Draft EIR** doesn't provide a detailed analysis of this compatibility, particularly with respect to traffic, noise, and visual impacts on adjacent neighborhoods.
- **Comment:** EDH APAC supports the objective of creating a community compatible with its surroundings. To ensure this, we request a more specific analysis of how the project's proposed land uses and densities, particularly under the different alternatives, will be compatible with the adjacent communities to the east and west. This analysis should include detailed modeling of traffic and noise impacts on existing neighborhood streets.

G-8

2. Employment and Housing Balance (Objectives 3 & 4)

- **Concern:** Objectives 3 and 4 link the project to providing housing for local employees. While this is a valid goal, the **Draft EIR** does not provide specific data on the number of new residents that are expected to be employed within El Dorado Hills. This makes the objective difficult to evaluate.
- **Comment:** The objectives of providing housing for local employees and supporting local businesses are commendable. However, to evaluate the effectiveness of these objectives, EDH APAC would like to see a more detailed analysis of the expected employment-housing balance. Are there any studies or data that project the percentage of new residents who are likely to work in El Dorado Hills or El Dorado County? This information would help confirm that the project genuinely addresses this objective.

G-9

3. Flexibility and Student Generation (Objective 9)

- **Concern:** Objective 9 introduces flexibility, including the option for age-restricted housing to reduce student generation "if the elementary and middle school district lacks capacity." This places the burden of proof on the school district and introduces uncertainty into the project's impact.
- **Comment:** Objective 9's reference to age-restricted housing as a response to school district capacity issues is a significant point of flexibility. EDH APAC believes that the **responsibility to mitigate student impacts should not be contingent on the school district's capacity but should be a proactive measure** from the outset. We request a clearer commitment from the applicant to a plan that ensures adequate school capacity, in the event that the project were to impact student enrollment rates, whether through impact fees or a guaranteed development plan that addresses this issue regardless of future enrollment numbers. Relying on a 'potential' reduction in student generation is not a sufficient mitigation strategy.

G-10

4. Park and Open Space as a "Focal Point" (Objective 8)

- **Concern:** The objective of creating parks as a "focal point" is positive, but the **Draft EIR** doesn't provide specific details on the amenities planned for these parks. Without this information, it's impossible to know if they will truly serve as community focal points.
- **Comment:** EDH APAC fully supports Objective 8, which designates parks, open space, and trails as a focal point. To ensure this objective is met, EDH APAC requests that a more detailed, conceptual plan for the amenities, design, and programming of the proposed parks be provided. For example, what specific recreational uses (e.g., sports fields, playgrounds, community gardens) are planned? This information is crucial for evaluating whether the parks will be able to serve the needs of the community and truly act as a 'focal point.'

G-11

General Comments

- **Outreach:** EDH APAC appreciates that the applicant, particularly in the pursuit of the RIA, appears to address many of the community's initial concerns, demonstrating a willingness to engage with the community, and seeking constructive feedback.
- **Support for RIA:** Of the Project and the alternatives considered in this DEIR, EDH APAC supports **Alternative 3: Reduced Impact Alternative (RIA)** due to its lower density and reduced environmental impact.

G-12

Specific Concerns and Clarifications

1. Population and Housing

- **Concern:** While the RIA significantly reduces the total population compared to the proposed project, the calculation is based on a 40% reduction for age-restricted units. This is a crucial assumption. The "Areas of Controversy" section lists traffic and school capacity as key issues, and both are directly tied to population.
- **Comment:** EDH APAC acknowledges that the RIA's population of approximately 997 residents is a significant reduction from the proposed project. However, this calculation is based on an assumed 40% reduction for age-restricted units. We request clarification on the data or studies supporting this specific 40% reduction, as a different assumption could result in a higher population and greater impacts on traffic and schools, two of the stated areas of controversy.

G-13

2. Neighborhood Commercial and Parks

- **Concern:** The RIA removes the 1.8-acre neighborhood commercial land use but retains the *potential* for it through a "subsequent discretionary process." The land is initially designated as Village Park. This creates uncertainty and risks a future land use change that could negatively impact the community by taking away parkland. The RIA provides a negligible park increase (0.5 acres) with the commercial land removed.

- **Comment:** The RIA's decision to remove the neighborhood commercial designation and designate the land as a Village Park is appreciated. However, EDH APAC is concerned about the potential for future development of this parkland into a commercial use via a 'subsequent discretionary process.' We believe that to truly address community concerns and ensure the parkland is preserved, this area should be permanently designated as parkland. EDH APAC would like the EIR to explore the feasibility of a binding agreement or legal mechanism that would make this conversion difficult or impossible. G-14

3. Open Space and Habitat Preservation

- **Concern:** The RIA shifts the balance of open space, designating 4.4 more acres to the "Open Space Preserve" but 4.8 fewer acres to "Open Space Buffer." While the overall acreage is similar, this change in designation and use could be significant for passive recreation and habitat protection.
- **Comment:** EDH APAC supports the increased acreage designated as 'Open Space Preserve' under the RIA, as this enhances the protection of sensitive habitats. We request additional detail on the specific rationale and implications of the corresponding reduction in 'Open Space Buffer.' How will this change affect the planned multi-use trails and passive recreation opportunities for residents? We also want to confirm that a detailed and funded long-term management plan is in place to ensure the integrity of both the preserved and buffered open spaces is maintained. G-15

4. Circulation and Traffic

- **Concern:** Traffic on local roadways is listed as a major area of controversy. The RIA proposes only "minimal changes" to the circulation system, which includes upgrading a portion of Royal Oaks Drive to a Minor Collector Street. This could introduce more traffic onto a local street, potentially affecting the quality of life for existing residents. The removal of a local street at the southeast corner is also a change that requires a clear justification.
- **Comment:** Traffic on local roadways is a key area of controversy. The RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street is concerning, as it may increase traffic volume and speed on a local street. We request that the EIR provide a more detailed traffic analysis specifically modeling the impacts of this change on existing residents. Additionally, the rationale for the removal of the small local street at the southeast corner of the site should be clearly explained to ensure there are no negative impacts on internal or external circulation. G-16

3.0 Environmental Analysis

Overall Summary

Aesthetics 3.1

1. General Comments on Methodology and Findings

- EDH APAC recognizes the detailed nature of the aesthetics section, including its site-specific analysis, discussion of scenic viewpoints, and use of relevant regulations.
- The EIR concludes that development of the site will cause a **significant and unavoidable impact** on both scenic vistas (Impact 3.1-1) and the visual character of the area (Impact 3.1-2). EDH APAC agrees with this conclusion.
- EDH APAC initially finds support for **Alternative 3: Reduced Impact Alternative (RIA) -** this is based on the belief that this alternative would lessen these significant and unavoidable impacts due to its reduced density and population.

G-17

2. Specific Concerns and Clarifications on Scenic Vistas (Impact 3.1-1)

- **Impact of Noise Barriers:** The EIR acknowledges that noise barriers would "replace existing views of the broad foothills... with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers."
- **Comment:** The EIR correctly identifies that solid noise barriers will have a significant visual impact from Latrobe Road. We suggest a more detailed visual simulation or rendering showing the specific height, location, and materials of these barriers from a motorist's perspective on Latrobe Road and from the public pathway would better inform the community. We also recommend that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment. While the aesthetic aspects of the noise barriers is desired, effective mitigation achieved by the noise barriers should remain the primary focus.

G-18

- **Preservation of the Hilltop:** The EIR notes the preservation of the high point of the site (650 feet AMSL) as a public trail and viewpoint.
- **Comment:** The preservation of the hilltop at 650 feet AMSL and its integration into the public trail system is a positive feature. To ensure this remains a protected public viewpoint, we request that the legal status and long-term maintenance of this area be clarified. Will a conservation easement or similar mechanism be used to permanently protect this land from future development?

G-19

3. Concerns on Visual Character and Quality (Impact 3.1-2)

- **Impact of Urbanization:** The EIR correctly finds that the project will substantially degrade the visual character of the site from undeveloped grassland to suburban development.
- **Comment:** We agree that the project will fundamentally change the visual character of the site from undeveloped land to a suburban residential development. While this is a significant and unavoidable impact, the project's design can help mitigate this to a degree. We suggest the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA CC&Rs to ensure a cohesive and less visually jarring appearance from public viewpoints. G-20
- **Alternative 3's Role:** The EIR briefly mentions that the "Active Adult option" might have slightly reduced impacts due to single-story homes, but this is a very general statement. The RIA should be more explicitly addressed here.
- **Comment:** The EIR notes that the Active Adult option could have slightly reduced impacts due to single-story homes. We believe the full **Alternative 3 (RIA)**, with its lower overall density, would result in a less severe visual impact compared to the base project. We request the EIR provide a comparative visual analysis, perhaps with a series of renderings, that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity of the 'significant and unavoidable' impacts. G-21

4. Light and Glare (Impact 3.1-3)

- **Concern:** The EIR concludes that the impact from light and glare will be **less than significant** because the project will comply with existing standards. This is a common finding, but a plan for concrete implementation should be developed.
- **Comment:** The EIR's conclusion that light and glare impacts are 'less than significant' relies on compliance with existing County standards. To provide greater assurance, we request more specific detail on how these standards will be implemented. For example, will all streetlights be required to be 'full-cutoff' fixtures? Will there be specific restrictions on 'uplighting' or decorative lighting? These details, if included in the final plan, would provide more certainty to the community. G-22
- **Concern:** The EIR mentions that the project will be subject to the County's Outdoor Lighting Standards.
- **Comment:** We ask that the EIR clarify which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. Will this be a requirement in the HOA CC&Rs, or will it be a condition of project approval? G-23

5. Cumulative Impacts (Impacts 3.1-4, 3.1-5, and 3.1-6)

- The EIR finds that the project will have a **significant and unavoidable cumulative impact** on both scenic vistas and visual character.
- **Comment:** EDH APAC concurs with the EIR's conclusion that the project, along with other cumulative developments, will result in a significant and unavoidable impact on the area's scenic vistas and overall visual character. This finding further justifies our preference for **Alternative 3 (RIA)**, which, by its nature, would contribute less to this cumulative impact than the base project. We believe that acknowledging this significant cumulative impact makes the reduced scale of the RIA the most responsible path forward for the County.

G-24

Air Quality 3.2

General Observations

- The EIR correctly identifies that the project will have a **significant and unavoidable impact** on air quality due to the exceedance of the El Dorado County Air Quality Management District (EDCAQMD) significance threshold for Reactive Organic Gases (ROG) during operations.
- The EIR states that even with the less dense **Alternative 3 (RIA)**, the ROG exceedance would still occur. EDH APAC acknowledges this, however, while the RIA's lower overall emissions are a more responsible choice, if they still don't meet the threshold.

G-25

1. The Core Significant and Unavoidable Impact

- **Concern:** The EIR states that the project's operational emissions will exceed the EDCAQMD's significance threshold for ROG, leading to a "significant and unavoidable" impact. This is the most critical finding in this section.
- **Comment:** EDH APAC acknowledges and agrees with the EIR's conclusion that the project will result in a significant and unavoidable impact on air quality due to exceeding the EDCAQMD's ROG emissions threshold. We understand that mitigation measure AQ-2 is proposed to address this, but it's clear that it does not fully mitigate the impact. We support the finding that this is a significant and unavoidable impact, as this is a more transparent and accurate assessment of the project's air quality effects.
- **Clarification on Mitigation:** The EIR states that mitigation measure AQ-2, requiring zero-VOC paints, is all that is feasible. We would suggest a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to reduce this impact further.

G-26

2. The "Active Adult Option" and its Impact

- **Concern:** The EIR clearly states that the Active Adult option, which is a major component of the preferred RIA, would still exceed the ROG threshold despite having fewer vehicle trips. The document provides the specific reduction amount (15.1 lbs/day) but still concludes the impact is significant.
- **Comment:** The EIR notes that even with the reduced vehicle trips from the Active Adult option, the project would still exceed the ROG threshold. We request that the final EIR's analysis for Alternative 3 (RIA) be as transparent as possible in showing the exact ROG emissions numbers for that specific alternative and comparing them directly to the base project. This will allow the public and the county to clearly see the air quality benefits of the RIA, even if the impact remains significant.

G-27

3. Consistency with Air Quality Plans

- **Concern:** The EIR states that because the project exceeds the EDCAQMD's ROG threshold, it "could conflict with or obstruct implementation of the applicable air quality plan." This is a significant finding that should not be overlooked.
- **Comment:** EDH APAC remains concerned that the project's excess ROG emissions conflict with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. We would suggest a more explicit explanation from the EDCAQMD on how this project's unmitigated ROG emissions fit into their overall attainment strategy for the region. What is the process for a project that cannot meet the 'project alone' significance criteria but still wishes to move forward?

G-28

4. Health Risks and Sensitive Receptors

- **Concern:** The EIR concludes that the project will have a "less than significant" impact on sensitive receptors from localized CO and toxic air contaminants (TACs) during construction.
- **Comment:** The EIR's conclusion that the project will not expose sensitive receptors to substantial concentrations of localized CO or construction-related TACs is reassuring. However, the EIR also finds that the project will have a significant and unavoidable impact from operational ROG emissions, which are a precursor to ozone (O3). The health effects of O3 exposure are well-documented. We would suggest a more direct discussion on the potential long-term health risks to nearby sensitive receptors (e.g., residents, John Adams Academy) from the project's contribution to regional ozone formation. Even if not precisely quantifiable, a qualitative assessment of this specific health risk should be included.

G-29

5. Emissions from Off-Model Sources

- **Concern:** The EIR mentions a variety of sources but focuses heavily on vehicle trips. It briefly mentions that the majority of ROG emissions come from mobile sources and consumer products.
- **Comment:** The EIR states that the majority of ROG emissions are from mobile sources and consumer products. We support the inclusion of mitigation measure AQ-2, but we also ask for more information on the 'green cleaning product education program.' What specific form will this program take, how will it be made available to all residents, and what will the enforcement mechanism be to ensure this program is effective over the long term?

G-30

Biological Resources 3.3

General Comments

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1. Significant and Unavoidable Impacts

- **Concern:** The EIR states that the project's individual and cumulative impacts on **special-status plants, northwestern pond turtles, tricolored blackbirds, and burrowing owls** are **significant and unavoidable** despite mitigation.
- **Comment:** EDH APAC concurs with the EIR's determination that the project's impacts on special-status species, including the tricolored blackbird, are significant and unavoidable. We urge the applicant and the County to implement the proposed mitigation measures with the utmost care to ensure the project's contribution to these impacts is as minimal as possible. The purchase of mitigation credits, while a necessary step, should be pursued with the highest level of scrutiny to ensure they are effective and provide a true offset for the habitat loss on site.

G-31

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2. Specific Habitat and Species Concerns

- **Tricolored Blackbirds:** The EIR identifies an active tricolored blackbird colony on the project site and acknowledges that construction and human presence could cause colony abandonment. Mitigation is proposed, but the EIR's language indicates it's a known controversy.
- **Comment:** EDH APAC is concerned about the tricolored blackbird colony identified on the project site. Given the species' threatened status and the admission that human disturbance could cause colony abandonment, we request a more detailed and binding plan to protect this colony. Specifically, we ask for a commitment to a **no-disturbance buffer** that is larger than the standard and is permanently protected through a conservation easement or similar legal mechanism. We also request that the project's long-term management plan include specific measures to monitor and protect the colony in perpetuity, not just during construction.

G-32

- **Vernal Pools:** The EIR acknowledges the presence of vernal pools and their importance to sensitive plant species, but also finds that they will be impacted.
- **Comment:** While we appreciate the project's commitment to preserve some of the site's aquatic resources, we are concerned about the direct removal of **0.07 acres of vernal pools**, which are unique and sensitive habitats. We would like to see an analysis of whether the project footprint under **Alternative 3 (RIA)** could be modified to fully avoid these vernal pools, thereby eliminating this impact. This would be a significant step toward demonstrating the project's commitment to reduced environmental impact.

G-33

- **Northwestern Pond Turtle:** The EIR notes that the project has a "low potential" to directly impact this species, which was recently proposed for federal listing.

- **Comment:** We are concerned that the EIR's analysis for the northwestern pond turtle, a species proposed for federal listing, is based on a 'low potential' for occurrence. We recommend that the mitigation measures for this species be as robust as possible, including a requirement for **protocol-level surveys** prior to any ground-disturbing activities. We also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property, which is identified as potential habitat for this species. G-34

3. Mitigation Measures and Long-Term Protection

- **Uncertainty in Offsite Mitigation:** The EIR relies heavily on the purchase of offsite mitigation credits for impacts to wetlands, streams, and special-status species.
- **Comment:** The reliance on offsite mitigation, while a standard practice, creates a level of uncertainty. We ask for more information on the specific mitigation banks that would be used and how the County will ensure that the credits purchased provide equivalent or better habitat value than the habitat being lost. We are concerned that the lack of onsite mitigation for certain impacts could lead to a net loss of habitat value in the project area itself. G-35
- **Enforceability of Mitigation:** Many mitigation measures rely on future actions, such as surveys, work area delineation, and long-term maintenance by an HOA.
- **Comment:** EDH APAC supports the proposed mitigation measures (e.g., BIO-1 through BIO-7), but we have concerns about their long-term enforceability. We recommend that the final project documents clearly state that **all mitigation measures will be conditions of approval** and that the County, in coordination with the project's HOA, will have the necessary enforcement power to ensure compliance in perpetuity. **A reminder: mitigation monitoring should not be a responsibility of residents**, but should be implemented via an effective monitoring program facilitated by County Staff. G-36

4. Overall Conclusion and RIA Support

- **Comment:** In summary, we believe the biological analysis in the Draft EIR is thorough and transparent in identifying significant and unavoidable impacts. The findings reinforce our position that **Alternative 3: Reduced Impact Alternative (RIA)** is the most environmentally responsible option. We urge the County to proceed with the RIA and to strengthen the proposed mitigation measures to ensure that the project's impacts on El Dorado Hills' sensitive biological resources are as minimal as possible. G-37

Cultural Resources 3.4

1. Transparency and Public Access to Information

- **Concern:** The EIR states that the primary cultural resources reports are confidential and not available for public review. While this is done to protect sensitive sites, it limits the public's ability to fully evaluate the findings.
- **Comment:** EDH APAC understands the need for confidentiality regarding the location of sensitive cultural resources. However, this also limits the public's ability to independently verify the EIR's findings. We recommend that the County and the applicant provide a more detailed, yet still confidential, summary of the types of resources found, and the specific mitigation strategies proposed, to relevant community groups to ensure all parties are comfortable with the findings.

G-38

2. The Distinction Between Historic and Archaeological Resources

- **Concern:** The EIR states that no significant "historic built environment resources" were found, but that archaeological resources were identified, and there is a potential for more to be found. The EIR makes a strong distinction between these two types of resources.
- **Comment:** The EIR effectively distinguishes between historic built environment resources and archaeological resources. We support the finding that no significant historical structures are present. Regarding archaeological resources, we agree that the potential for unknown discoveries is significant, given the site's rich history. We support the EIR's conclusion that this is a potentially significant impact and that mitigation measures are necessary.

G-39

3. Mitigation Measures: Specifics and Enforceability

- **Concern:** Mitigation measures CUL-2 and CUL-4 outline procedures for what to do if a discovery is made. These measures, while standard, are critical.
- **Comment:** EDH APAC supports the proposed mitigation measures for the unanticipated discovery of cultural resources (CUL-2) and human remains (CUL-4). To ensure the integrity of these measures, we request that the County clearly define the roles and responsibilities of the archaeological monitor and the project contractor. Additionally, we ask for a commitment that the project's **Improvement Plans** and **Final Maps** will include the full text of these mitigation measures to ensure they are binding and enforceable.
- **Clarification on Monitoring:** CUL-3 requires an archaeological monitor to be present during ground-disturbing activities within 200 feet of four specific sites.
- **Comment:** EDH APAC is pleased to see a specific archaeological monitoring plan in CUL-3. We request clarification on the full scope of the monitoring. Will the monitor be present full-time during all ground-disturbing activities in the designated areas? What are

G-40

G-41

the qualifications of the archaeological monitor? This level of detail is important for the community to feel confident that sensitive resources will be protected.

G-41 Cont.

4. Cumulative Impacts

- **Concern:** The EIR finds that the project will have a potentially significant cumulative impact on archaeological resources and human remains. It concludes that mitigation will reduce this to a "less than significant" level.
- **Comment:** We agree with the finding that the project's incremental contribution to the cumulative loss of archaeological resources is considerable. We support the EIR's conclusion that the proposed mitigation measures (CUL-1 through CUL-3) will reduce this impact to a less-than-significant level. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent cultural resources analysis."

G-42

5. RIA vs. Proposed Project

- **Concern:** The EIR states that the impacts would be the same under the RIA as the proposed project because the "development footprint, intensity, and disturbed area would remain the same."
- **Comment:** The EIR states that the cultural resource impacts for the RIA would be the same as the proposed project. While we understand the rationale, it is worth noting that the RIA's lower overall population and fewer dwelling units could lead to a lesser long-term human disturbance to the open space and trails, which may contain undiscovered cultural resources. We ask that the County consider this long-term, subtle benefit of the RIA when evaluating the project's overall impacts.

G-43

Energy 3.5

1. Transparency and Proactive Measures

- **Concern:** The EIR states that the project's energy use is "not unusual or wasteful" because it is comparable to other projects. This is a baseline, not a goal for a new development in a modern context.
- **Comment:** EDH APAC supports the EIR's conclusion that the project's energy impacts are less than significant due to compliance with state and and local regulations. However, we believe the project has a responsibility to **exceed minimum standards** where feasible. We recommend the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards, such as enhanced insulation, high-performance windows, and energy-efficient appliances, to ensure the project is a leader in sustainable development.

G-44

2. All-Electric and Natural Gas Use

- **Concern:** The EIR mentions that the project would be designed to be all-electric and that natural gas infrastructure would be prohibited onsite. This is a very positive finding and a major win for the County's goals.
- **Comment:** EDH APAC appreciates the project's commitment to being an all-electric development, which is a critical step toward reducing greenhouse gas emissions and a move toward a more sustainable energy future. Recognizing this desire from a state and county planning perspective, we also acknowledge that property owners would prefer to be able to choose the energy matrix mix that they prefer.

G-45

3. Solar and Electric Vehicle Infrastructure

- **Concern:** The EIR mentions that the project will comply with solar panel and electric vehicle (EV) charging station requirements under Title 24.
- **Comment:** We support the project's commitment to providing solar panels and EV charging infrastructure in compliance with the California Building Standards Code. We recommend the EIR provide more detail on the specifics of the EV infrastructure. Will all residential units be required to have a dedicated EV charger, or will it be a shared charging station? What are the plans for EV charging in the neighborhood commercial area? We believe a higher level of detail is necessary to ensure the infrastructure will adequately serve the community's needs and support the state's transition to a zero-emissions vehicle fleet.

G-46

4. Cumulative Impacts and Project Contribution

- **Concern:** The EIR finds that the project will have a "less than significant" cumulative impact on energy because all new developments are required to comply with energy efficiency standards.
- **Comment:** We agree with the finding that the project's cumulative energy impacts are less than significant. However, it's important to recognize that a significant amount of new development is planned for the County. We believe the project, particularly with its proposed all-electric and reduced density features under Alternative 3, sets a positive precedent for other projects in the area to follow. This is a key area where the project can and should be a leader for future development.

G-47

Geology, Soils, and Paleontology 3.6

1. Specific Concerns and Clarifications

- **Geotechnical Study and Its Role:** The EIR repeatedly refers to a "design-level geotechnical investigation" that will be required before building permits are issued. The findings of this study are critical for final engineering but are not yet available.
- **Comment:** EDH APAC supports the EIR's conclusion that seismic and soil hazards are less than significant, provided that all recommendations from a future **design-level geotechnical investigation** are fully incorporated into the project's design. We suggest that the final project conditions of approval mandate the completion of this study and its full implementation as a non-negotiable condition for all building permits. This ensures that the EIR's assumptions about proper engineering and mitigation are carried out. G-48
- **Expansive and Soft Soils:** The EIR notes the potential for "pockets of clay soils with expansive properties" and "soft soils" that could lead to settlement. The proposed solution is a program of "over-excavation and recompaction."
- **Comment:** The EIR identifies the presence of expansive and soft soils as a potential hazard for structures. The proposed mitigation involves a program of over-excavation and recompaction. We suggest that the final project documents specify that this work will be overseen by a **certified geotechnical engineer** and that all work will be fully documented and approved by the County before any foundations are laid. This is crucial for protecting the long-term structural integrity of the homes and infrastructure. G-49
- **Slope Stability and Grading:** The EIR states that the project would be built on gentle slopes, but some areas have slopes of 30% or more. The EIR notes that the General Plan restricts development on these steeper slopes.
- **Comment:** EDH APAC is pleased that the project is designed to avoid steep slopes and that the County's policy (7.1.2.1) restricts development on slopes over 30%. We recommend that the final grading plans be made available for public review to confirm that the project footprint, even with re-contouring, fully avoids these sensitive areas and adheres to the natural contours as much as feasible to minimize erosion and landslide risk. G-50
- **Paleontological Resources:** The EIR concludes that the potential for paleontological resources is "remote" due to the site's geology.
- **Comment:** We agree with the EIR's conclusion that paleontological resources are unlikely to be present. However, we suggest that a standard **Unanticipated Discovery Protocol** be included in the project's final conditions of approval. This protocol should outline the steps to be taken in the unlikely event that a fossil is discovered during construction, ensuring that such a find would be properly handled and reported in accordance with state law. G-51

3. Overall Conclusion

- **Conclusion Comment :** In summary, EDH APAC finds the analysis in Section 3.6 to be thorough and well-supported. The findings of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for all recommended geotechnical studies, grading, and soil compaction. This ensures that the project's foundation is as safe and stable as possible for future residents.

G-52

Greenhouse Gas Emissions 3.7

1. The Core Significant Finding

- **Concern:** The EIR states that the project's operational GHG emissions, even with the proposed mitigation measure, would still be above the Sacramento Metropolitan Air Quality Management District (SMAQMD) threshold of significance. However, the EIR concludes that the impact is **less than significant** because the project would be consistent with state and local plans. This is a potential point of contention.
- **Comment:** EDH APAC is concerned that the EIR finds the project's impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. We believe this conclusion is inconsistent with the data presented. We suggest a more detailed justification for this conclusion and a clearer explanation of how the project's emissions will not impede the state's and region's ability to meet their GHG reduction targets.

G-53

2. Mitigation Measure GHG-1

- **Concern:** Mitigation measure GHG-1 is a key component of the project's GHG strategy. It requires an all-electric project with EV-ready parking spaces, and if not feasible, the purchase of off-site mitigation credits. This measure contains a number of potential escape clauses, such as "not enforceable or commercially feasible."
- **Comment:** EDH APAC supports the spirit of mitigation measure GHG-1, which aims to create an all-electric and EV-ready community. However, we are concerned about the language that allows for the use of natural gas if an all-electric design is found to be 'not enforceable or commercially feasible.' We suggest that the County clearly define these terms and provide a process for public review and a final determination by a third party. We believe that an all-electric design should be a binding requirement from the outset, not a conditional one.

G-54

- **Off-site Mitigation Credits:** The EIR allows for the purchase of off-site mitigation credits if an all-electric design is not feasible. This can be a problematic practice if the credits are not of high quality.
- **Comment:** EDH APAC is concerned about the reliance on off-site mitigation credits, or 'GHG credits,' to offset emissions. We believe that on-site mitigation is always preferable. If off-site credits are used, we ask that the County's review process be rigorous and transparent. We recommend that the County's review include a public hearing to ensure the credits are 'real, permanent, quantifiable, verifiable, enforceable, and additional,' as defined in the EIR, and that the community has a chance to comment on the plan.

G-55

3. Consistency with Plans and Policies

- **Concern:** The EIR concludes that the project is consistent with the state's Scoping Plan and the SACOG's MTP/SCS.
- **Comment:** EDH APAC is pleased that the project is consistent with the state's and region's plans for GHG reduction, including CARB's Scoping Plan and the SACOG's MTP/SCS. The project's commitment to reduced vehicle miles traveled (VMT) and a dense, walkable design are key components of this consistency. This reinforces our support for the Reduced Impact Alternative (RIA), which would further reduce VMT and be even more consistent with these plans.

G-56

4. Cumulative Impacts

- **Concern:** The EIR concludes that the project, along with other projects, would not result in a significant cumulative impact related to GHG emissions. The EIR uses a less-than-significant threshold based on SMAQMD's guidelines.
- **Comment:** We agree with the finding that the project's cumulative GHG impacts are less than significant, as the project's emissions are below the SMAQMD's threshold. This finding reinforces the importance of all future projects in the County adhering to these standards to ensure the region as a whole can meet its GHG reduction targets.

G-57

5. Final Recommendations

- **Comment:** In summary, EDH APAC supports the project's commitment to GHG reduction and its consistency with state and local plans. We believe that the project's impacts can be minimized by making the mitigation measures for an all-electric design more stringent and by ensuring a transparent and rigorous process for the review of any off-site mitigation credits. We believe the project, and particularly the **Reduced Impact Alternative (RIA)**, is a step in the right direction for the County's goal of projects with a sustainable future.

G-58

Hydrology and Water Quality 3.8

2. Specific Concerns and Clarifications

- **Community Concerns:** The EIR mentions concerns from residents of the Carson Creek Specific Plan about the project's impact on the Carson Creek Preserve.
- **Comment:** EDH APAC values the input of Community members in regards to the ongoing support of the Carson Creek Preserve. Our Environmental Standing Committee members appreciated the amount of discussion and dialog that the project applicants provided to both the Committee, and community members regarding the Carson Creek Preserve. G-59
- **Concern:** The EIR relies on the implementation of Best Management Practices (BMPs) and Low Impact Development (LID) features to manage stormwater. While these are good in theory, their effectiveness depends on proper maintenance over the long term.
- **Comment:** EDH APAC supports the project's plan to implement a Stormwater Drainage Master Plan with a variety of BMPs and LID features, including bioswales and detention basins. However, we are concerned about the **long-term maintenance and funding** for these systems. We request that the final project documents include a clear, binding plan for the perpetual maintenance of all stormwater facilities, overseen by a dedicated entity (e.g., the HOA) with a sufficient funding mechanism, such as a special assessment district. Zone of Benefit, CSA, or other dedicated funds, to ensure the features remain effective in perpetuity. G-60
- **Concern:** The EIR states that a "hydromodification pond" and other features will protect the downstream Carson Creek Preserve from adverse impacts.
- **Comment:** EDH APAC is pleased that the Draft EIR directly addresses the potential impacts on the Carson Creek Preserve. We recommend that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures. We would like to see a clear analysis of how these features will specifically protect the preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. We also recommend that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs as a result of project construction or operation. G-61
- **Concern:** The EIR acknowledges that the project will result in a "substantial increase in impervious surfaces" but concludes that this will be mitigated by the stormwater system.
- **Comment:** While the EIR claims that the stormwater plan will fully mitigate the effects of increased impervious surfaces, we ask that the County provide more detail on the specific calculations and modeling used to support this conclusion. We are particularly interested in how the system will handle a 'first flush' event, which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system. The design should be robust enough to handle these contingencies without impacting downstream water quality. G-62

- **Concern:** The EIR finds that groundwater recharge and quality will not be significantly impacted because the site is not located within a defined groundwater basin.
- **Comment:** EDH APAC accepts the finding that the project will not interfere with a groundwater basin. However, we ask that the final plan clarify how the project's LID features, such as infiltration basins, will protect localized groundwater from contamination. While the water is not used for drinking, it is still a resource that should be protected from any potential pollutants from the development.

G-63

3. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the analysis in this section to be comprehensive and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-64

Land Use, Population and Housing 3.9

1. Land Use Change and Consistency with Plans

- **Concern:** The project requires a General Plan Amendment from a Research & Development (R&D) designation to a residential designation. The EIR states this is not a conflict because the new designation (Adopted Plan) is consistent with the General Plan and its objectives for housing.
- **Comment:** EDH APAC understands that a General Plan Amendment is required to change the designation from Research & Development (R&D) to Adopted Plan (AP) to allow for residential development. While the EIR argues this is consistent with the General Plan, we emphasize the importance of this shift. We request that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area, which was previously designated for employment-focused R&D uses. G-65
- **Concern:** The EIR mentions that the project is "consistent with the surrounding communities" but does not provide extensive detail on how a high-density residential community will interface with the adjacent Business Park.
- **Comment:** The EIR states that the proposed land uses are compatible with the surrounding residential communities. We request a more detailed analysis of the compatibility with the existing El Dorado Hills Business Park to the north and the industrial uses to the south. We ask for a clear explanation of how the design of the residential community, including its parks and open space buffers, will prevent land-use conflicts (e.g., noise, lighting, traffic) between the new residents and the existing business park and industrial areas. G-66

2. Population Growth and The Reduced Impact Alternative (RIA)

- **Concern:** The EIR finds that the project's population growth (2,314 new residents) is within the SACOG MTP/SCS forecast. The EIR also analyzes the Active Adult Option, which reduces the population to 1,540 residents, and states this is also consistent.
  Comment: The EIR's analysis of the Active Adult Option, a key component of our preference for **Alternative 3 (RIA)**, is very important. The analysis projects a significant population reduction of approximately 33.5% (from 2,314 to 1,540 residents) compared to the base project. This reduction is a clear, quantifiable benefit that directly addresses community concerns about population growth. We urge the County to prioritize this alternative, as it represents a more sustainable approach to development that aligns with a more moderate growth pattern for the County. The lower population will also result in fewer impacts on public services, schools, and traffic. G-67

- **Concern:** The EIR correctly notes that CEQA views population growth as a social/economic issue and not a direct environmental impact unless it leads to a physical change.
- **Comment:** EDH APAC understands the legal framework of CEQA, where population and housing changes are not considered environmental impacts in and of themselves. However, we believe that the reduction in population under the RIA directly lessens the secondary, or indirect, physical impacts on the environment that are analyzed in other sections of the EIR, such as air quality, transportation, and public services. The reduced population of the RIA offers a direct and measurable benefit to the community's infrastructure and resources.

G-68

3. Housing and Affordability

- **Concern:** The EIR mentions that the project will provide a variety of housing types and that ADUs are permitted by state law. However, it states that the project is not designed to encourage ADUs and does not analyze their potential impact.
- **Comment:** The EIR notes that the project, and particularly the CV-SFM-PD residential designation, includes a mix of housing types. This aligns with a key goal of the County's Housing Element. We also appreciate that the plan allows for Accessory Dwelling Units (ADUs). We recommend that the final project design and HOA covenants be structured to actively **encourage** the development of ADUs as a way to provide more diverse and affordable housing options, which is a key goal of the state and County.

G-69

4. Overall Summary

- **Comment:** In summary, while the EIR finds the base project to be consistent with state and local land use plans, the analysis of population and housing clearly shows that the **Reduced Impact Alternative (RIA)** offers a superior outcome for the community. The significant reduction in population under the RIA directly addresses a key area of public concern and provides a measurable and lasting benefit to the community's infrastructure and quality of life.

G-70

Noise section 3.10

2. Specific Concerns and Clarifications on Mitigation

- **Concern:** The EIR's primary mitigation for traffic noise (NOI-4) and park noise (NOI-2) is the construction of solid noise barriers. The EIR also mentions that these barriers could be "masonry wall, earthen berm, or combination of the two."
- **Comment:** We support the use of noise barriers to protect both existing and future residents from excessive noise. However, we are concerned about the visual impact of these barriers, which was identified as a significant issue in the Aesthetics section. We request a more detailed visual analysis, such as a series of renderings, of the proposed noise barriers from public viewpoints, including Latrobe Road. We also request that the final barrier design be required to use materials that are visually compatible with the surrounding environment, such as a combination of an earthen berm with a decorative wall, to minimize the aesthetic impact. G-71
- **Concern:** The EIR finds that park noise could have a significant impact on nearby proposed residential units and requires a 6-foot solid noise barrier.
- **Comment:** EDH APAC is concerned about the potential for noise from the proposed parks to impact future residents. While mitigation measure NOI-2 requires noise barriers, we also request that the final project documents include specific rules and regulations for park hours and usage to be enforced by the HOA. This would provide an additional layer of protection for residents and help ensure that the parks are a positive amenity for the community. G-72
- **Concern:** The EIR finds that amplified outdoor music from potential commercial uses (e.g., a brewpub) could have a significant noise impact.
- **Comment:** We agree with the finding that amplified outdoor music is a potentially significant noise impact. We support mitigation measure NOI-3, which requires a separate acoustic analysis for any commercial use with live or amplified music. We request that the County's review process for such a permit be a public hearing, allowing for community input on the potential noise impacts. Additionally, we ask that the final approval for such a use include strict conditions on hours of operation and decibel limits. And finally, a monitoring program should be an active and ongoing process provisioned by the County. While a monitoring program should include resident feedback and support, the responsibility of ongoing monitoring should not be a burden left wholly to residents. G-73
- **Concern:** The EIR's informational analysis finds that some residential units near Latrobe Road will require upgraded windows and mechanical ventilation (air conditioning) to meet interior noise standards.
- **Comment:** EDH APAC has reviewed the informational analysis on interior noise and agrees that mitigation measure NOI-5, which requires upgraded windows and mechanical ventilation for some residential units, is necessary. We request that this G-74

measure be a **binding condition of approval** for any residential unit that is predicted to be exposed to noise levels that exceed the interior noise standard. This is crucial for ensuring the health and safety of future residents."

G-74 Cont.

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3. Traffic Noise and RIA

- **Concern:** The EIR finds that the project's traffic noise impacts on the existing community are "less than significant" because the increase is below the threshold of human perception. It also notes that the Active Adult Option would generate even less traffic noise.
- **Comment:** The EIR finds that the project's traffic noise impact is less than significant, and we agree with this finding. This conclusion is further strengthened by the data for the **Active Adult Option**, which projects a significant reduction in daily vehicle trips. This finding is a strong argument in favor of the Reduced Impact Alternative, as it provides a clear and measurable benefit to the community's noise environment."

G-75

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4. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the noise analysis to be a thorough and transparent assessment of the project's impacts. We support the EIR's proposed mitigation measures but ask for more detail and transparency in their implementation and enforcement. We also believe that the noise benefits of the **Reduced Impact Alternative**, particularly its reduced traffic noise, provide a compelling reason to move forward with that option.

G-76

Public Services and Recreation 3.11

1. Fire Protection and Emergency Medical Services

- **Concern:** The EIR states that the project's increase in population will not require a new fire station because EDH Fire has adequate personnel and equipment. It also points to the proximity of Station 87 and mutual aid agreements as sufficient. However, the EIR does not explicitly state that the project will have no impact on the County's 8-minute response time goal.
- ~~**Comment:** We appreciate the detailed information on the El Dorado Hills Fire Department's resources and the proximity of Station 87. However, the EIR's conclusion that the project will have a less-than-significant impact on fire protection services is based on the assumption that existing services are adequate. We request a more direct analysis of how the project's population will affect the County's General Plan goal of an **8-minute response time for Community Regions**. We ask for a clear statement from EDH Fire on whether they anticipate being able to meet this goal for the new community and what specific, binding actions would be required to maintain it.~~
- ***EDH FIRE RESPONSE PROVIDED TO EDH APAC August 18, 2025 :*** *Station 87 is located at 4680 Golden Foothill Parkway in the EDH Business Park. This engine has an estimated response time of 3-4 minutes to the project. Engine 87 responds to approximately 1,453 calls for service annually. That equates to approximately 4 calls every 24 hours. Engine 87 has sufficient capacity to accommodate the increased population created by this project.*
  Supporting Engine 87 is Engine 91 located at 7660 S. Shingle Road. This engine has an estimated response time of 7-8 minutes to the project. Engine 91 responds to approximately 80 calls for service annually. That equates to approximately 0.22 calls every 24 hours. Engine 91 is the designated move-up and cover engine that will backfill Engine 87's response area when it is committed to a long-term incident. Engine 91 has more than sufficient capacity to provide backup coverage to support project.
  Also supporting Engine 87 is Engine 85 located at 1050 Wilson Blvd. This engine has an estimated response time of 8-10 minutes to the project. Engine 85 responds to approximately 918 calls for service annually. That equates to approximately 2.5 calls every 24 hours. Engine 85 has sufficient capacity to provide backup coverage to support project.
- **Concern:** The EIR mentions the existence of a Fire Safe Plan (Appendix J) but does not provide details. This is a critical document given the project's location.
- **Comment:** EDH APAC considers the Fire Safe Plan to be a critical document for public safety. We request that the County provide public access to this plan for a full review. We are particularly interested in the plan's provisions for emergency access, evacuation

G-77

routes, and vegetation management, and how these will be enforced in perpetuity, especially with respect to the new homeowners' association.

G-77 Cont.

2. Law Enforcement

- **Concern:** The EIR concludes that law enforcement impacts are less than significant because the El Dorado County Sheriff's Office already exceeds its staffing goal of one deputy per 1,000 residents and that the project's impact fees and property taxes will fund future needs.
- **Comment:** EDH APAC accepts the EIR's conclusion that the project will not require a new law enforcement facility. We also acknowledge that the project's population will not cause the Sheriff's Office to fall below its staffing goal. However, we ask for a more specific analysis of how the project's population will be integrated into the West Slope Patrol's service area and whether a new substation or additional patrols would be required to maintain response times and service levels. We also request a clear explanation of how the project's tax revenues will be directly funneled to law enforcement services to support the new population.

G-78

3. Schools

- **Concern:** This is the most complex section. The EIR finds a significant need for new or expanded elementary and middle schools due to the project's student generation. However, it concludes that the impact is "less than significant" because the payment of statutory school impact fees under SB 50 is considered "full mitigation" under state law. It also points to the Active Adult Option as a way to "address" the concerns of the Latrobe School District.
- **Comment:** EDH APAC recognizes that the project's generation of over 486 new elementary and middle school students will have a significant impact on the Latrobe School District, which currently has a combined enrollment of only 162 students. We understand that under SB 50, the payment of development fees is considered 'full mitigation' for the purposes of CEQA. However, we believe this does not fully address the physical and logistical reality of a more than tripling of the student population. We strongly urge the applicant and the County to prioritize the **Active Adult Option** as a direct response to this significant impact on the school district, as it would reduce the student count from 603 to 99 students. This is the most responsible way to proceed, as it addresses a significant community concern that is not fully mitigated by impact fees alone.
- **Concern:** The EIR finds that Oak Ridge High School has more than enough capacity for the project's students, and enrollment is projected to decrease.
- **Comment:** We are pleased with the finding that the project's high school students can be accommodated within the existing capacity of the El Dorado Union High School District. However, enrollment projections by the EDUHSD in the past have forecasted

G-79

G-80

declining enrollment at the Oak Ridge campus, and yet the community has witnessed for years that the campus remains impacted by a student enrollment significantly larger than the school was originally designed and built to accommodate.

G-80 Cont.

4. Parks and Recreation

- **Concern:** The EIR finds that the project provides enough parkland (13.6 acres) to meet the County's standards (12.9 acres). It concludes that there will be no impact on existing parks.
- **Comment:** EDH APAC is pleased that the project is designed to meet and exceed the County's parkland dedication standards. We are also glad to see the inclusion of an option to convert the 1.8-acre commercial site into a park, which would further increase the parkland ratio. We request that the final project plans include a detailed conceptual design for the parks, including specific amenities, to ensure they will serve the community's needs and truly function as 'focal points,' as mentioned in the project's objectives. We also want to ensure that the public has access to the parks, even if they are maintained by a private HOA. EDH APAC seeks clarification on if a deed restriction would be possible to facilitate public access to these park facilities if maintained by an HOA

G-81

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds that the project's impacts on public services and recreation can be managed, but that a more transparent and detailed plan for mitigation and funding is needed. We believe the most effective way to address the significant concerns about school capacity is to move forward with the **Reduced Impact Alternative (RIA)**. This alternative, with its lower student generation and population, is the most responsible choice for the Creekside Village Specific Plan.

G-82

Transportation 3.12

1. VMT Analysis and CEQA Compliance

- **Concern:** The EIR states that the project's VMT per capita is below the County's threshold, so the impact is less than significant. This is a crucial CEQA finding. The EIR also notes that the preferred **Alternative 3 (RIA)** would have an even lower VMT due to fewer trips.
- **Comment:** EDH APAC acknowledges and supports the EIR's conclusion that the project's VMT per capita is below the County's threshold. This finding is a key factor in our support for the project. We also note that the analysis for the **Active Adult Option** projects an even greater reduction in trips and VMT, which further strengthens the case for moving forward with that alternative as the most sustainable choice for the community. We recommend that the County formally adopt this finding as a primary benefit of the RIA.

G-83

2. Traffic Operations and Real-World Impact

- **Concern:** The EIR explicitly states that a "project's effect on automobile delay and traffic LOS is not considered a significant environmental impact" under CEQA. This means the EIR does not have to analyze the everyday traffic congestion that residents will experience. The TIS, however, does contain this analysis for informational purposes.
- **Comment:** EDH APAC understands that CEQA no longer requires an analysis of traffic Level of Service (LOS) and vehicle delay as a significant environmental impact. However, this is complicated by CEQA requirements of consistency with the County's General Plan, and the General Plan's implicit inclusion of LOS metrics in the Transportation Element. Additionally, the real-world experience of traffic congestion is a primary concern for the community. We request that the County make the full LOS analysis from the Transportation Impact Study (TIS) publicly available and easy to access. This will allow the community to understand the project's traffic impacts and whether the proposed roadway and intersection improvements will be sufficient to mitigate everyday congestion.

G-84

- **Concern:** The EIR mentions several off-site roadway improvements that are needed to accommodate the project's traffic. These include signalization at the Latrobe Road/Royal Oaks Drive intersection.
- **Comment:** The EIR's conclusion that the project will not substantially increase hazards relies on the assumption that necessary roadway improvements will be made. We request a clear, binding commitment from the applicant and the County on the **specific timeline and funding mechanisms for all off-site roadway and intersection improvements**. This is crucial to ensure that new residents can access the community

G-85

safely and that existing residents do not experience a decline in traffic flow before these improvements are made. As mentioned earlier, assuming that improvements can be realized via the auspices of the County's twenty-year CIP horizon will result in most of the improvements not being constructed. Roadway improvements at a minimum must be concurrent with the buildout of the project.

G-85 Cont.

3. Pedestrian and Bicycle Facilities

- **Concern:** The EIR finds that the project will enhance bicycle and pedestrian access. It also *mentions* a **potential** Class I trail along the Placerville & Sacramento Valley Railroad rail line. This is a major benefit for the community.
- **Comment:** EDH APAC is very pleased with the project's commitment to enhancing bicycle and pedestrian access, including the construction of internal trails and sidewalks that connect to existing facilities. This aligns with our goals for a walkable and bike-friendly community.
  However - there is no official proposed "plan" for the Class 1 trail as of the end of this comment period on the DEIR. EDH APAC requests more specific details on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line to ensure that a seamless network is created. This is a short segment to connect to the Placerville & Sacramento Valley Railroad rail line from the Plan Area, and should be adopted as a formal component of the Specific Plan's Transportation element.

G-86

4. Emergency Access and Safety

- **Concern:** The EIR finds that emergency access will be adequate and mentions a new emergency access road that will be gated and used as a bike path. This is a critical safety feature.
- **Comment:** EDH APAC considers emergency access and safety to be of paramount importance. We support the EIR's conclusion that the project will have adequate emergency access. We ask for a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency. This information is crucial for ensuring the safety of all residents, both new and existing.

G-87

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the transportation analysis to be a comprehensive assessment of the project's VMT impacts and an informative look at its operational impacts. We support the EIR's conclusions regarding VMT and safety, but we ask for more detail and transparency on the specific plans and funding for roadway improvements. We believe that the **Reduced Impact Alternative (RIA)**, with its

G-88

significantly lower trip generation, is the most responsible choice for the Creekside Village Specific Plan and will provide the greatest long-term benefit to the community's transportation network.

G-88 Cont.

Tribal Cultural Resources 3.13

1. Acknowledgment of Tribal Consultation and Confidentiality

- **Comment:** EDH APAC acknowledges and appreciates the thorough tribal consultation process undertaken by the applicant and the County, as detailed in this section. We understand that confidentiality is paramount to protecting these sensitive resources, and we respect the tribal governments' requests to keep specific information private. The willingness of all parties to engage in government-to-government consultation is a positive sign for the project.

G-89

2. Significant Impacts and Mitigation

- **Concern:** The EIR clearly states that several precontact archaeological resources (P-09-006004, P-09-006011, P-09-006012, and P-09-000157) were identified as TCRs by the consulting tribes. The EIR also states that the project's original design would have a significant impact on these resources. The conclusion is that this is a **significant and unavoidable** impact even with mitigation.
- **Comment:** We agree with the EIR's conclusion that the project, as originally proposed, would have a significant and unavoidable impact on the identified Tribal Cultural Resources. The EIR's discussion of the tribes' perspective—that they are the contemporary stewards of their culture and the landscape—underscores the gravity of this finding. It is clear that the preservation of these resources is of critical importance to the tribal governments. The commitment to a **cultural avoidance alternative**, which led to the Reduced Impact Alternative (RIA), is a direct and necessary response to this finding.

G-90

- **Concern:** The EIR states that the project applicant developed a "cultural avoidance alternative" which led to the RIA. This alternative avoids a majority of the TCRs.
- **Comment:** We are pleased that the consultation process led to the development of an alternative design that avoids a majority of the identified TCRs. This is a clear demonstration of the applicant's and the County's commitment to mitigating this significant impact. EDH APAC **strongly endorses the Reduced Impact Alternative (RIA)** as the most responsible and culturally sensitive path forward for this project. This alternative, which prioritizes the avoidance and protection of TCRs, should be the preferred and recommended option.

G-91

- **Concern:** The EIR outlines mitigation measures for unanticipated discoveries of human remains and cultural resources. These include training, monitoring, and specific protocols. The EIR also explicitly states that the tribes expressed the importance of certain TCRs remaining in their current location.

- **Comment:** We support the proposed mitigation measures (TCR-1 through TCR-5) for unanticipated discoveries and the relocation of resources if avoidance is not possible. To ensure the integrity of these measures, we request that the final project conditions of approval include a binding requirement for **tribal monitoring** during all ground-disturbing activities in areas identified as sensitive. Additionally, we ask for a commitment that in-place preservation will be the priority, and that relocation, if necessary, will only be done in consultation with the tribes and with their full consent. The commitment to providing secure on-site storage for culturally sensitive materials is also a welcome and necessary measure.

G-92

3. Cumulative Impacts

- **Concern:** The EIR finds that the project would make a "cumulatively considerable contribution" to a significant cumulative impact on TCRs. This is because these resources are non-renewable and all adverse effects contribute to a dwindling resource base.
- **Comment Suggestion:** We agree with the EIR's conclusion that the project's incremental contribution to the cumulative loss of TCRs is considerable. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent tribal consultation process. The existence of the **Reduced Impact Alternative (RIA)**, which was developed in direct response to tribal concerns, demonstrates that a project can move forward while also protecting significant cultural heritage. We believe this alternative represents the best path forward for the Creekside Village Specific Plan and a model for future development in the County.

G-93

Utilities and Service Systems 3.14

1. Water Supply and Demand

- **Concern:** The EIR states that the project's water demand (481 AFY for the base project) is well within the El Dorado Irrigation District's (EID) supply, even during multiple dry years. The EIR also references EID's Integrated Water Resources Master Plan which identified a future **capacity deficit of 45 mgd in 2030** for the El Dorado Hills Water Treatment Plant (WTP). The project's demand, while small, is additive to this known deficit.
- **Comment 1:** EDH APAC is concerned that while EID has sufficient water supply, the EIR acknowledges a projected deficit in water treatment capacity at the El Dorado Hills Water Treatment Plant (WTP). We request a more explicit statement from EID regarding the specific steps being taken to expand the WTP to meet the cumulative demand from new development, including this project. It is crucial that the capacity deficit is addressed before new development contributes to the strain on the system. G-94
- **Comment 2:** EDH APAC is concerned about EID's Draft EIR in progress for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz. This would facilitate a downstream flow of water to other unincorporated areas, rather than routing from Folsom Lake like the rest of El Dorado Hills. They are evaluating this solution vs. extensive energy-intensive pumping of raw and treated water from Folsom Reservoir. Creekside Village SP was included in their growth analysis but, what is unclear, is if CVSP will be affected or delayed by this decision and EIR approval. What is the plan and timeline for delivery to get water to the CVSP area, since there is no current utility infrastructure? G-95
- **Concern:** The EIR mentions that age-restricted units use approximately 40% less water. This is a significant benefit of the preferred alternative.
- **Comment:** EDH APAC notes the significant finding that the **Active Adult Option** would reduce water consumption by an estimated 40% per age-restricted unit. This represents a substantial water savings for the community and is a key reason for our support of the Reduced Impact Alternative (RIA). We urge the County to formally recognize this water savings as a tangible benefit of the RIA. G-96

2. Wastewater

- **Concern:** The EIR states that the project's wastewater generation will not exceed the current capacity of the El Dorado Hills Wastewater Treatment Plant (WWTP). However, it also mentions that the plant is expected to reach its current capacity in 2025 and that an expansion to 5.45 mgd is planned for 2026. The EIR acknowledges that the project's demand is additive to this future planned expansion.

- **Comment:** We understand that the project's wastewater generation will be accommodated by the El Dorado Hills Wastewater Treatment Plant (WWTP). However, we are concerned about the timing of the planned expansion. We request confirmation that the WWTP expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand. We would also like to know if there is a plan to ensure that the project's impact fees contribute directly to the funding of this expansion, and not be borne as an expense of current EID ratepayers. G-97

3. Solid Waste

- **Concern:** The EIR concludes that solid waste impacts are less than significant because there is adequate landfill capacity for the project's estimated waste (2,064 cubic yards per year). It also mentions that the landfill is expected to cease operations in 2048.
- **Comment:** EDH APAC is pleased that the project is not anticipated to exceed the capacity of the local solid waste facilities. We support the project's commitment to complying with the County's Construction and Demolition Debris Recycling Ordinance. We recommend that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met. G-98
- **Concern:** The EIR mentions that the Active Adult option would generate approximately 33% less waste than the base project.
- **Comment:** EDH APAC notes that the **Active Adult Option** would generate significantly less solid waste than the base project. This is another environmental benefit of the Reduced Impact Alternative (RIA) that should be formally recognized by the County. G-99

4. Other Utilities

- **Concern:** The EIR states that the project will be served by PG&E and Pioneer Community Energy and that new infrastructure will be installed underground.
- **Comment:** We are pleased with the commitment to undergrounding new utility lines, which is a key aesthetic and safety benefit. We request confirmation that this commitment extends to all new utility distribution lines associated with the project, both on- and off-site. G-100

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the utilities analysis to be thorough and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and G-101

footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-101 Cont.

Wildfire 3.15

1. General Observations

- **Comment:** EDH APAC agrees with the EIR's finding that the project has a **"potentially significant impact"** on wildfire risk. This is a transparent and accurate finding that demonstrates a recognition of the inherent dangers of building in this area.
- **Comment:** The EIR outlines a multi-layered approach to mitigation, including a Fire Safe Plan, ignition-resistant building materials, defensible space, and an education program for residents. EDH APAC expresses support for this comprehensive strategy.
- **Comment:** The EIR notes that the **Active Adult Option** would have a 33.5% reduction in residents, which would reduce the number of people exposed to wildfire hazards.

G-102

2. Evacuation and Emergency Response

- **Concern:** The EIR states that the project will have a "less than significant" impact on emergency response and evacuation plans. This is a crucial conclusion that relies on the effectiveness of new access points and Latrobe Road as an evacuation route. However, it also acknowledges that the County does not publicly distribute evacuation plans.
- **Comment:** EDH APAC is deeply concerned with the finding that the project will not impair an adopted emergency response or evacuation plan, especially since the County's plans are not publicly available. The EIR's conclusion relies on a qualitative assessment and an assumption that Latrobe Road will be a sufficient evacuation route for all new residents. We request a **quantitative analysis of evacuation times** for the new community and the surrounding area under a worst-case wildfire scenario. This analysis should consider the traffic from the project, the existing Blackstone, and Heritage communities, other surrounding developments, and the Eastridge development, currently under construction. A "less than significant" finding is difficult to accept without this critical data.

G-103

- **Concern:** The EIR mentions five emergency access points, including one to the adjacent business park.
- **Comment:** The inclusion of multiple emergency access points is a positive feature. We request more specific details on the legal status and guaranteed long-term maintenance of these access points, particularly the one connecting to the business park. EDH APAC needs to be assured that these access points will be functional and accessible to fire and emergency services at all times.

G-104

3. Fire Safe Plan and Long-Term Maintenance

- **Concern:** A major component of the mitigation strategy is the **Fire Safe Plan (FSP)**, which outlines specific requirements for defensible space, fuel modification, and building

standards. The EIR states that the HOA will be responsible for enforcing and maintaining many of these measures.

- **Comment:** EDH APAC supports the comprehensive and detailed requirements of the Fire Safe Plan (WF-2). However, the long-term effectiveness of this plan hinges on the ability of the homeowners' association (HOA) to enforce and fund these requirements in perpetuity. We request that the final project documents include a legal mechanism, such as a permanent maintenance district, Zone of Benefit, CSA, or a dedicated funding source, that ensures the continued enforcement of the FSP's provisions, particularly for the Wildfire Fuel Reduction Zone (WFRZ) and defensible space, even if the HOA fails to do so. This is a matter of public safety that should not be left to chance. G-105
- **Concern:** Mitigation measure WF-4 requires a fire-resistant landscape plan.
- **Comment:** We are pleased with the requirement for a fire-resistant plant palette (WF-4). We request that the County's final approval include a list of prohibited and recommended plants to guide new residents and the HOA. This provides clarity and helps ensure that the new community is as fire-resistant as possible from the outset. G-106

4. Post-Fire Hazards

- **Concern:** The EIR finds that the project could expose residents to post-fire hazards (WF-6), such as flooding or erosion, but concludes that this is a "less than significant" impact due to a proposed post-fire assessment plan.
- **Comment:** The EIR correctly identifies the risk of post-fire hazards, particularly erosion and flooding. While mitigation measure WF-6 requires a post-fire field assessment, we believe the project's design should be more resilient from the start. We recommend that the final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist to ensure they can withstand the effects of a severe wildfire and not increase the risk of post-fire erosion or flooding for both the project and downstream communities. G-107

5. Overall Conclusion

- **Comment:** "In summary, the committee finds the wildfire analysis to be a thorough and transparent assessment of the project's risks. We support the EIR's proposed mitigation measures but believe that more concrete and binding assurances are needed for evacuation planning, long-term maintenance, and post-fire hazards. We strongly believe that the **Reduced Impact Alternative (RIA)**, with its significantly lower population, is the most responsible choice for the Creekside Village Specific Plan and represents a more sustainable approach to development in a high-fire-hazard area. G-108

Other CEQA Considerations 4

1. Significant and Unavoidable Impacts

- **Aesthetics:** The EIR confirms that the project's impact on scenic vistas and visual character is **significant and unavoidable**.
- **Air Quality:** The EIR confirms that the project's conflict with the applicable air quality plan and its contribution to regional non-attainment pollutants are **significant and unavoidable**.
- **Tribal Cultural Resources:** The EIR confirms that the project's impact on a tribal cultural resource is **significant and unavoidable**.
- **Comment:** EDH APAC has reviewed the list of significant and unavoidable impacts and agrees with the EIR's findings. This is a transparent acknowledgment of the project's most serious environmental consequences. These findings, particularly the impacts on aesthetics and tribal cultural resources, underscore our committee's strong belief that the **Reduced Impact Alternative (RIA)** is the responsible path forward. While the RIA does not completely eliminate all significant impacts, its reduced density and preservation of cultural resources directly address these concerns in a more meaningful way than the base project.

G-109

2. Significant Irreversible Environmental Changes

- **Concern:** The EIR states that the conversion of 208 acres of undeveloped land to urban uses is an **irreversible environmental change**. It also notes the permanent consumption of nonrenewable resources. The EIR concludes that these changes are less than significant because the project is in compliance with regulations.
- **Comment:** EDH APAC acknowledges that the project will result in the irreversible conversion of undeveloped land to urban uses and the permanent consumption of natural resources. While we understand the EIR's conclusion that this is a less-than-significant impact, we believe the irreversible nature of this change demands a commitment to the most sustainable development possible. We support the EIR's finding that the RIA would have the same irreversible impacts, but we suggest that its lower density and reduced population represent a more conservative and sustainable use of these resources, making it the more prudent choice for the community's long-term future.

G-110

3. Growth-Inducing Impacts

- **Concern:** The EIR concludes that the project is **not significantly growth-inducing** because it is consistent with regional growth projections and does not extend infrastructure to previously unserved areas.

- **Comment:** EDH APAC agrees with the EIR's conclusion that the project is not significantly growth-inducing. We are pleased that the project is designed to serve only its own needs and does not extend infrastructure in a way that would spur unplanned growth in other areas. This is a critical finding that aligns with our community's goals for managing growth responsibly.

G-111

4. Overall Conclusion

- **Comment:** In summary, the **Other CEQA Considerations** section effectively summarizes the most critical findings of the Draft EIR. The numerous significant and unavoidable impacts, particularly in aesthetics and tribal cultural resources, highlight the need for a more environmentally sensitive approach. EDH APAC's preference for the **Reduced Impact Alternative (RIA)** is rooted in its ability to directly address these significant impacts, while still providing a well-planned community consistent with the County's and region's long-term growth projections. We believe the RIA represents the more responsible and sustainable path forward for the Creekside Village Specific Plan.

G-112

Alternatives 5

1. General Observations

- **Comment:** The EIR is very clear that other than Alternative 1: No Project/No Development, Alternative 3 (the Reduced Impact Alternative, or RIA) is the **environmentally superior alternative** and that it was developed in direct response to tribal and other environmental concerns.
- **Comment:** The EIR states that the RIA avoids the significant and unavoidable impacts of the proposed project on Air Quality and Tribal Cultural Resources. It also states that the RIA is environmentally superior to both the Proposed Project and the Zoning Consistent Alternative.

G-113

2. Specific Alternatives

Alternative 1: No Project/No Development

- **Concern:** The EIR correctly identifies the No Project/No Development Alternative as the one with the fewest environmental impacts, as required by CEQA.
- **Comment:** EDH APAC acknowledges that the No Project/No Development Alternative would avoid all environmental impacts. However, we also recognize that this alternative would not achieve any of the project's objectives, such as providing new housing and creating a connected community.

G-114

Alternative 2: Zoning Consistent Alternative (R&D)

- **Concern:** This alternative would develop the site with over 2 million square feet of warehouse and office uses, consistent with the site's existing zoning. The EIR's analysis for this alternative is highly critical, finding that it would likely have greater or similar impacts to the proposed project in many areas (aesthetics, air quality, noise, wildfire). Due to the recent attempts at “shoe-horning” projects that the community believes are not consistent with the R&D zone, such as large fulfillment warehouses, the community has expressed the desire for less impactful projects on the proposed CVSP site.
- **Comment:**EDH APAC agrees with the EIR's analysis that the Zoning Consistent Alternative is an inferior option. The EIR correctly concludes that this alternative would have greater or similar impacts on aesthetics, air quality, noise, and wildfire risk due to the nature of warehouse and office uses and associated truck traffic.

G-115

Alternative 3: Reduced Impact Alternative (RIA)

- **Comment:** EDH APAC finds that the EIR's analysis of the **Reduced Impact Alternative (RIA)** is compelling and provides a clear path forward for the Creekside Village Specific Plan. The EIR's finding that the RIA is the environmentally superior alternative is well-supported by the evidence. This alternative directly addresses the most significant environmental impacts identified for the proposed project by preserving Tribal Cultural Resources and reducing operational air pollutant emissions below the level of significance. This achievement is a testament to a successful and collaborative planning process.
- **Concern:** The EIR still finds a significant and unavoidable impact on aesthetics even with the RIA.
- **Comment:** While the EIR correctly finds that the RIA will still have a significant and unavoidable impact on aesthetics, we acknowledge that any development of this site would result in this finding. We believe the RIA's preservation of more open space and its lower overall density will help to minimize this visual impact, making it a more desirable project from an aesthetic standpoint.

G-116

G-117

3. Final Conclusion and Recommendation

Comment: The Alternatives section of the Draft EIR is a critical tool for decision-making. Its findings provide overwhelming support for the **Reduced Impact Alternative (RIA)** as the environmentally superior choice. The RIA is the more responsible and sustainable option, as it avoids the most serious environmental impacts of the proposed project, directly addresses the concerns of tribal governments and the community, and still meets all of the project's core objectives. EDH APAC strongly urges the County to consider the RIA as the final project.

G-118

EDH APAC appreciates the opportunity to discuss, review, and provide findings on proposed development projects in El Dorado Hills.

Respectfully,

John Davey
Chair

El Dorado Hills Area Planning Advisory Committee
"Non-Partisan Volunteers Planning Our Future Since 1981"

Response to Comment Letter G

El Dorado Hills Area Planning Advisory Committee
John Davey, Chair

G-1 The comment provides a general overview of the positive relationship between the applicant and the El Dorado Hills Area Planning Advisory Committee (APAC) with the applicant; support for the Reduced Impact Alternative (RIA); and commends the applicant for including a significant amount of parks and open space. The comment is noted and no further response is required.

G-2 The comment expresses support for the RIA and recommends the Executive Summary chapter be revised to note support of the RIA to avoid confusion. The comment clarifies that the APAC comments are based on the assumption the RIA is the preferred project.

The Executive Summary chapter includes a detailed overview of how and why the RIA was prepared on page ES-1 under section ES.1, Document Purpose. Within this overview it is stated "County staff intends to recommend the RIA for approval because it avoids impacts to TCRs [tribal cultural resources], reduces other environmental impacts, and is the land use plan preferred by the Tribes" and "… the project applicant has committed to the Tribes, County staff, and members of the community that it will support approval of the RIA because it is environmentally superior and addresses the concerns of numerous stakeholders." County and applicant support of the RIA is clearly noted in this chapter. To ensure the reader understands Table ES-1 is addressing impacts from the proposed project and not the RIA, the text on page ES-3 is revised. Please see Chapter 2, Changes to the Draft EIR for the revised text.

G-3 The comment requests a detailed explanation of the decision-making process to convert 1.8 acres of neighborhood commercial to park uses. The determination to implement the commercial use would be up to the developer and would be based on market conditions and community feedback during project implementation. The RIA proposes the 1.8-acre parcel as park land. For the proposed project, Table A.2 of the Creekside Village Specific Plan (CVSP) identifies permitted and conditionally permitted commercial uses. For the RIA, any of the limited potential commercial uses in Table A.2 of the CVSP-RIA would require future discretionary approval through a Conditional Use Permit (CUP) and planned development (PD).

G-4 The comment requests analysis of impacts on local services (e.g., calls for emergency medical services) and change in traffic patterns resulting from implementation of the Active Adult option.

As discussed on page 3.11-17 of the Draft EIR, it is unlikely that Active Adult residents would increase need for emergency services given that the Active Adult option is anticipated to attract residents who are still working or in early retirement looking for an active, independent living community. Even assuming increased calls for emergency services may be required as the community residents age, as discussed in Section 3.9, Land Use, Population and Housing, the Active Adult option would result in approximately 33.5% fewer residents than the proposed project. The reduced population would likely correlate with a reduced demand for emergency, fire and police services and account for any perceived increase in services related to the age of the residents. Similarly, the reduced population would result in fewer vehicle trips and traffic impacts.

Traffic impacts associated with the Active Adult option were analyzed in the June 4, 2024, Creekside Village Project Active Adult (Age-Restricted) Housing Option, CEQA Vehicle Miles Traveled (VMT) Addendum ("Active Adult Addendum" provided in Appendix H to the Draft EIR). The number of vehicle trips under the Active Adult option would be reduced to 6,186 daily trips, compared to 10,040 daily trips from the proposed project.

G-5 The comment recommends a plan for long-term maintenance and management of Open Space Preserve (CV-OS1) and Open Space Buffer (CV-OS2), and expresses interest in how the use of multi-use trails in the Open Space Buffer will be managed to protect sensitive natural features while allowing for passive recreation. The Specific Plan proposes the maintenance of Open Space areas by the Homeowners Association (HOA) and/or a Landscaping and Lighting Assessment District. The Specific Plan is very restrictive in the CV-OS1 land use designation as it is intended to preserve and protect biological and cultural resources. The CV-OS1 land use boundary will be established in consultation with the U.S. Army Corps of Engineers to protect natural resources and the Tribes to protect cultural resources. The CV-OS2 land use designation, while less restrictive, has very limited uses allowing the area to act as a buffer to the CV-OS1 land use designation and the active land use areas. Sections 5.6 and 8.1 of the Specific Plan require County approval of an Open Space Management Plan prior to the final map. Section 5.6 states that "[t]he plan shall describe the ownership, funding and necessary maintenance plans to ensure the long term preservation of the Plan Area open space."

G-6 The comment pertains to proposed off-site roadway improvements and funding mechanisms for improvements. The traffic studies analyzing level of service (LOS) are included in Appendix H of the Draft EIR. Note that changes in LOS are not analyzed within the Draft EIR itself as congestion-based analysis is not considered to determine impacts on the environment for the purpose of CEQA. However, LOS is included in the record for General Plan consistency and the Transportation Impact Study, which includes LOS, was in Appendix H of the Draft EIR for informational purposes. Consistency with Policy TC-Xf will be reviewed by both the Planning Commission and Board of Supervisors and addressed in the conditions of approval. Again, while not relevant for CEQA, it is worth noting for informational purposes that Policy TC-Xf requires the county to either (1) condition the project to construct all road improvements necessary to address a project's fair-share of any resulting level-of-service deficiency, or (2) ensure the construction of the necessary road improvements are included in the County's 10-year capital improvement program.

G-7 The comment requests additional clarity be provided on the following: the RIA; a process for converting the neighborhood commercial to park uses; analysis of the Active Adult option on local services and traffic; management plan for the open space and buffer areas; and information on off-site infrastructure improvements. Please see Responses to Comments G-2, G-6, and G-14 through G-16.

G-8 The comment requests analysis of how the project and alternatives' proposed land uses and densities will be compatible with the adjacent communities to the east and west, including modeling of traffic and noise impacts on existing neighborhood streets. The project's land use and densities were proposed by the applicant to match existing surrounding communities in the Carson Creek Specific Plan to the west and the Valley View Specific Plan to the east. The travel demand model used the existing traffic patterns from the Blackstone community to the west with similar household sizes and roadway patterns to project future VMT associated with the project. Anticipated project traffic and external traffic from the travel demand model was then used as a starting point to analyze the noise impacts on future internal roadways and sensitive noise receptors adjacent to the project. Both the

proposed project and RIA had traffic impact studies completed with detailed modeling and the noise study (completed by Bollard Acoustical Consultants, Inc.) considers impacts from project noise on the surrounding residential communities. Operational noise impacts from the RIA were evaluated in a supplemental memorandum to the noise study.

Additionally, the applicant has provided a table showing the similarities between the RIA and the adjacent communities of the Carson Creek Specific Plan and Valley View Specific Plan. Creekside Village is expected to have similar home types to the adjacent plan areas consisting of traditional and compact-single family homes. The proposed streets, sidewalks, and circulation patterns match these existing communities. The plan features a central community center that will be a local gathering place similar to the community centers at Heritage and Blackstone to the east and west. The connectivity within the plan area and to the adjacent communities will allow for safe travel and promote neighbor interaction. The project site would not include any Research & Development (R&D) land uses that would conflict with the adjacent residential communities.

	Proposed Project	RIA	Carson Creek	Valley View
Lot Sizes	4,500 sqft – 5,775 sqft*	3,250 sqft - 6,825 sqft	3,250 sqft - 7,000 sqft	2,987 sqft - 2.0 ac
Total Units	918	763	1,925	2,840
Acreage	208	208	709	2,037
Population	2,314 (1,540 with Active Adult Option)	1,305	3,465	7,764

Note: RIA = Reduced Impact Alternative; sqft = square feet; ac = acres.

* The large lot parcels included with the Proposed Project were not mapped as part of the original project and thus lot sizes were not included in the Creekside Village Specific Plan, but the large lots were likely to have lots as small as 2,300 sqft.

G-9 The comment requests a more detailed analysis of the expected employment-housing balance. Projecting the number of residents that would be employed within El Dorado County or El Dorado Hills is highly speculative and is not an environmental impact considered for the purposes of CEQA. However, the project does include multiple housing types (5 different homesite sizes: some conventional and active adult under the RIA and Active Adult Option) that would provide opportunities for new or existing employees to live in El Dorado Hills. The project is adjacent to the El Dorado Hills Business Park and near Town Center, both large employment centers on the western slope of the County. While active adult communities are restricted to people who are 55 years and older, those residents are anticipated to be active members of the workforce.

G-10 The comment requests a clearer commitment to ensure adequate school capacity in the event that the project were to impact student enrollment rates. Page 3.11-8 of the Draft EIR addresses the statutory limits of mitigation for impacts to schools under CEQA. Specifically, and as described in the Draft EIR, Senate Bill (SB) 50 requires all new development to pay applicable school mitigation fees to the school district(s) where the development is located and the payment of SB 50 school impact fees are considered full mitigation under CEQA for school facilities impacts. As explained in the Draft EIR, "SB 50 thus limits the type of impacts analyzed in an EIR and excuses consideration of or mitigation for any adverse physical changes to the school grounds and school buildings and "any school-related consideration relating to a school district's ability to accommodate enrollment." The Active Adult Option and inclusion of active adult units within the RIA reduces the number of students generated by the Active Adult Option and RIA and was developed in coordination with the school district after analyzing

their capacity and existing facilities. The school district has indicated that it has site limitations that prevent the expansion of the existing campus and the project itself, even if entirely conventional, would not generate enough students to warrant a new school. The project therefore will fully mitigate its impacts consistent with CEQA under SB 50, and the Active Adult Option and RIA will, as requested by the district, limit the number of students consistent with the district's existing capacity.

G-11 The comment requests that a more detailed plan for the amenities, design, and programming of the proposed parks be provided. For purposes of CEQA, analysis of recreation considers whether the project will increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and whether the project includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse effect on the environment. These issues are analyzed in detail in the Draft EIR and the impacts are found to be less than significant. The Specific Plan also dictates what uses are allowed within parks and open space uses. The final design of these parks will be determined prior to improvement plans for park development being submitted. The applicant has provided conceptual renderings of potential park programming and lighted sports fields are not allowed. The conceptual renderings are included as Appendix B of this Final EIR.

G-12 The comment expresses appreciation that the applicant has engaged with the community and has received constructive feedback and has addressed many of APAC's concerns and reiterates its support of the RIA. The comment is noted and no further response is required.

G-13 The comment requests clarification on data or studies supporting the 40% reduction in population for age-restricted units. The Draft EIR explains the reasoning for the 40% reduction for age restricted units in Sections 3.9, Population and Housing (p. 3.9- 17), 3.11, Public Services (p. 3.11-17), 3.12, Transportation (p. 3.12-23), and 3.14, Utilities and Service Systems (p. 3.14-17). As detailed therein, the 40% was calculated based on the residency restrictions in state law for active adult communities and the determination by numerous public agencies justifying the adoption of reduced impact fees for age-restricted dwelling units due to the determinations of those agencies that there is a reduction in the number of persons per household and corresponding reduction in the impacts and needs resulting from the potential future residents. In addition, the RIA has an overall 17% reduction in total number of units (918 to 763). The Traffic Impact Analysis identifies there is a 55% reduction in trips per household for an age-restricted unit compared to a conventional home. This trip generation number is from the Institute of Traffic Engineers (ITE). As additional evidence that reduced ITE trip generation rates utilized for age restricted housing are applicable to the Sacramento region, a memorandum documenting a prior analysis comparing observed age restricted housing trip generation to published ITE data is attached as Appendix C of this Final EIR. That analysis concluded that observed trip generation for age restricted housing was lower than the published ITE rate for age restricted housing and at least 70% lower than the published rates for traditional single-family housing.

G-14 The comment expresses concern about the potential conversion of parkland to neighborhood commercial under the RIA. The approval of any land use on this parcel other than park uses will require approval of multiple entitlements including a CUP and PD. These conditional uses are limited to park-related commercial uses that would support the park and the community if approved. Future commercial uses would require additional environmental review of the proposed use and would require public hearings allowing for community input on any proposed use.

G-15 The comment requests additional details on the rationale and implications of the reduction in Open Space Buffer under the RIA. In the RIA, there is a reduction in Open Space Buffer but an increase in the Open Space Preserve acreage to accommodate the complete avoidance of sensitive resources. The reduction in Open Space Buffer acres will not impact the planned multi-use trails or passive recreation opportunities within the Open Space Buffer areas. The project requires an approved Open Space Management Plan which will address the long-term maintenance and management of the open space areas that will be owned by the HOA. The RIA's approved Fire Safe Plan (FSP) also includes the long-term comprehensive fuel reduction management and defensible spaces requirements within the Open Space land use designations for the plan area.

G-16 The comment requests a more detailed traffic analysis modeling the RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street, and requests the rationale for removal of the small local street at the southeast corner of the site.

The southeast corner of the site in the RIA has fewer connections on to Royal Oaks Drive, along with that area of the plan being gated. The traffic studies analyzing LOS are included in Appendix H of the Draft EIR for informational purposes. Note that changes in LOS are not analyzed within the Draft EIR itself as congestion-based analysis is not considered to determine impacts on the environment for the purpose of CEQA. However, LOS is included in the record for General Plan consistency.

G-17 The comment acknowledges that the Draft EIR includes a detailed, site-specific analysis of aesthetics and agrees with the significant and unavoidable impact finding on scenic vistas and change in visual character. The comment reiterates support of the RIA, in part, because it would help lessen the significant and avoidable impacts due to a reduction in density and population. The comment is noted and no further response is required.

G-18 The comment requests a more detailed rendering showing the noise barriers from a motorist's perspective on Latrobe Road and from the public pathway, and recommends that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment.

Photos of potential noise barriers have been provided by the applicant. The design will ultimately be approved by an acoustical consultant for the purposes of noise attenuation but will be similar to existing solid noise barriers of surrounding communities. These noise barriers are typically earth-toned colors to help them blend harmoniously with the surrounding natural environment. Design and construction materials of the wall will be determined while preparing improvement plans.



G-19 The comment requests clarification on the legal status and long-term maintenance of the hilltop. Development of this parcel is restricted by its open space designation and the limited uses permitted in that land use designation. This area will be included in the approved Open Space Management Plan which will address the long-term maintenance and management of the open space areas that will be owned by the HOA. While not anticipated, any subsequent action to alter from the proposed project would be required to comply with CEQA.

G-20 The comment suggests the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA covenants, conditions, and restrictions (CC&Rs) to ensure a cohesive and less visually jarring appearance from public viewpoints.

Specific architectural designs, guidelines and color palettes will be enforced through the CC&Rs and imposed on all residential and park uses by the HOA. Section A.1 of the Creekside Village Specific Plan requires the adopted CC&Rs are consistent with the County's approved Community Design Guide. The El Dorado County Community Design Guide standards are intended to ensure well designed buildings and landscaping to enhance the visual character and reflect the values of a community. This will ensure the project integrates into the existing communities and scenic corridors. Additionally, the specific plan has design standards that are more stringent than the County Code, such as the maximum height of a residential unit being 35-feet rather than the 40' that is allowed and the plan providing an Open Space Buffer adjacent to Latrobe Road in order to increase the setback from the scenic corridor to reduce visual impacts from public viewpoints. This information is also summarized in Section 3.1, Aesthetics, of the Draft EIR.

G-21 The comment requests the EIR provide a comparative visual analysis that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity impacts.

A comparative analysis of aesthetic impacts between the proposed project and the RIA is included in Chapter 5, Alternatives, of the Draft EIR (pp. 5-19 through 5-20). Changes to the visual character of the site under this alternative would generally be the same as the proposed project but would retain some of the existing topography based on the elevation of the area that would be preserved in open space. The RIA land use plan is comparable to the proposed project, with similar types of development proposed in the same general areas throughout the project site. Single-family residential lots would comprise most of the site, with smaller lots located in the western-central portion of the site, and open space would surround the natural water features generally located along the northern and northwestern boundary of the site. Changes to the site under the RIA (such as the additional Open Space Preserve land) would not result in a substantial visual change. The need for larger lots to allow single-story homes to accommodate an age-restricted community not only reduces the height of structures but also reduces the number of total units due to need for larger lots. A typical 2-story home can be 26- to 28-feet in height where a single- story home is typically less than 16-feet to 18-feet in height. Given the natural topography of the property from Latrobe Road to the eastern boundary dropping more than 100-feet in elevation, the reduced height of homes and the reduction in the density of homes, will further reduce the visual impact of structures and potential lighting that come from residential development. The project was also designed with Open Space Buffers adjacent to Latrobe Road to provide a greater setback from the road for homes along the road. This buffer combined with Latrobe Road being 15-feet to 28-feet above the proposed lots further reduces the visual impacts from public viewpoints.

G-22 The comment requests more detail regarding the project's compliance with the County's lighting standards. The project will provide a street lighting exhibit designed consistent with the County's Outdoor Lighting Standards and will be submitted with the final map. The County standards are intended to eliminate nighttime light and glare. The Outdoor Lighting Standards include requirements for full cutoff fixtures for residential lighting. The project is intended to limit overall light and glare while also meeting the safety standards for the community. A residential landscaping and lighting plan will be approved by the County prior to building permits being issued in compliance with adopted County Standards. All lighting for the proposed project will be consistent with the County Community Design Standards and Outdoor Lighting Standards. See also the analysis under Impact 3.1-3 in Section 3.1, Aesthetics, of the Draft EIR.

G-23 The comment requests clarification on which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. As described in Section 3.1 of the Draft EIR, the project would comply with all applicable provisions of the standards including maximum height limits for light fixtures, and requirements for outdoor luminaires to be full cutoff if rated greater than 1,000 initial lumens. Compliance with the County Outdoor Lighting Standards will be part of the project's Conditions of Approval. The type of use within the project, such as a civic or residential use, shall determine what standards are applied to from the adopted lighting standards. The County lighting standards are enforceable by the County Planning and Building Department. Additionally, the HOA would also have the ability to enforce certain lighting standards. The Specific Plan does not propose

lighting standards and thus does not provide exemptions or deviations from the County's Outdoor Lighting Standards.

G-24 The comment expresses support of the Draft EIR's finding of a significant and unavoidable cumulative impact on scenic vistas and visual character and reiterates support of the RIA because it would help reduce the significant cumulative impact. The comment is noted and no further response is required.

G-25 The comment agrees with the Draft EIR's finding of a significant and unavoidable impact on air quality associated with an increase in reactive organic gases (ROGs) due to project operation and notes that under the RIA the impact would remain significant and unavoidable. The comment is noted and no further response is required.

G-26 The comment requests a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to further reduce air quality impacts.

As described in the Air Quality (Section 3.2) and Greenhouse Gas Emissions (3.7) impact analyses prepared for the proposed project, the majority of ROG emissions associated with the proposed project would be generated by mobile sources and consumer products (e.g., deodorants, cleaning products, spray paint, etc.). Only 0.40 pounds per day (lbs/day) of operational ROG emissions associated with the proposed project would be generated by energy sources. Thus, even if the proposed project were to be all electric, emissions of ROG would not be reduced to below the applicable threshold of significance. In addition, Mitigation Measure GHG-1 included in the Air Quality and Greenhouse Gas Impact Analysis would prohibit the installation of natural gas infrastructure on-site. However, as noted therein, the potential exists that a challenge could be brought forth in the future and a future court decision could find that all-electric mitigation requirements or greenhouse gas (GHG) emissions thresholds are preempted for covered appliances. The feasibility of an all-electric development also relies on the adequate availability of electricity at the time of development. Therefore, to conservatively address the possibility that the prohibition of natural gas infrastructure on-site may not be enforceable or commercially feasible at the time of development for certain project components, the use of GHG/carbon offsets is included in Mitigation Measure GHG-1 to ensure that any natural gas usage associated with the proposed project due the unenforceability of the prohibition of natural gas or commercial infeasibility of all electric is adequately offset at the time of project development.

Possible additional mitigation measures for further reducing consumer product emissions could include limitations on consumer products at the site (e.g., amounts, types, etc.); however, such mitigation cannot be feasibly enforced or verified. The sale, manufacturing, substance control, and content limitation (such as volatile organic compounds [VOC] limits) of consumer products are regulated by federal, State, and/or local government agencies. The El Dorado County Air Quality Management District (EDCAQMD) is charged with local enforcement of regulations regarding consumer products that are associated with effects on air quality. The EDCAQMD is also charged with developing measures to offset potential effects on regional air quality through their planning efforts.

Regarding mobile source emissions, as discussed in Section 3.12, Transportation, of the Draft EIR, the proposed project inherently includes features that contribute to a reduction in vehicle trips and VMT, such as site enhancements and features that encourage alternative modes of transportation. Such features subsequently result in a reduction in mobile source emissions of criteria pollutants, including

ROG. The criteria air pollutant modeling conducted for the proposed project already accounts for such inherent features through the project-specific VMT applied in the modeling. Additional measures for the reduction of mobile source emissions (beyond the proposed project's inherent site and/or design features), sufficient to reduce emissions of ROG to below the applicable thresholds of significance, are not available, nor feasible for the proposed project at this time.

Therefore, as stated in the Air Quality and Greenhouse Gas Emissions impact analyses prepared for the proposed project, Mitigation Measure AQ-1 represents all feasible mitigation to reduce project generated ROG emissions.

G-27 The comment requests a comparison of the ROG emissions numbers between the RIA and the proposed project. The ROG emissions associated with the Active Adult Option and the RIA are presented within Table 5-4 of the Draft EIR, as well as within the Active Adult Project Option Technical Memorandum, which is included as an Appendix to the Draft EIR. As stated in Table 5-4 (page 5-21 of the Draft EIR), the EDCAQMD significance threshold for ROG is 82 lbs/day; the Proposed Project and Active Adult Option exceed this threshold with 100 lbs/day and 84.9 lbs/day, respectively. The RIA does **not** exceed this threshold and is estimated to result in 62.6 lbs/day. Page 5-21 of the Draft EIR states: "Compared to the proposed project, the RIA would produce 37.4 fewer pounds of ROG and 24.3 fewer pounds of NO_x [oxides of nitrogen] per day, or 22.3 fewer pounds of ROG and 20.5 fewer pounds of NO_x per day under the Active Adult Option."

G-28 The comment expresses concerns with the project's ROG emissions conflicting with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan.

The Draft EIR analyzes the project's consistency with the Ozone Attainment Plan under Impact 3.2-5 in Section 3.2, Air Quality. In preparing the Air Quality and Greenhouse Gas Impact Analysis, Raney confirmed the approach and thresholds utilized with the EDCAQMD. In cases in which a proposed project's significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the "benefits of the project outweigh the significant effects on the environment." (Public Resources Code, Section 21081, sub. (b); see also, CEQA Guidelines, Sections 15093, 15043, sub.(b).) In the Statement of Overriding Considerations, the agency can identify the specific economic, social, and other considerations that, in its judgment, outweigh the significant environmental effects that the proposed project will cause. It is also noted that implementation of the RIA would reduce this impact to a less-than-significant level.

G-29 The comment suggests a more direct discussion on the potential long-term health risks to nearby sensitive receptors from the project's contribution to regional ozone formation.

As acknowledged in the Air Quality (Section 3.2) and Greenhouse Gas Emissions (Section 3.7) impact analysis and Draft EIR Appendix B prepared for the proposed project, because the proposed project would result in ROG emissions above the EDCAQMD threshold of significance, the proposed project was determined to result in a significant and unavoidable impact regarding health effects associated with criteria air pollutants, even with implementation of all feasible mitigation measures.

However, ascertaining cancer risk, or similar measurements of health effects from air pollutants, is very difficult for regional pollutants such as the ozone precursors ROG and NO_X, because an agency's ability

to make the connection between air pollutant emissions and public health consequences in a credible fashion has limitations in technical methodologies. For example, ozone concentrations depend upon various complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. EDCAQMD has not provided any methodology to assist local governments in reasonably and accurately assessing the specific connection between mass emissions of ozone precursors (e.g., ROG and NO_X) and other pollutants of concern on a regional basis and any specific effects on public health or regional air quality concentrations that might result from such mass emissions.

Nonetheless, the nearby Sacramento Metropolitan Air Quality Management District (SMAQMD) has released a Strategic Area Project Health Screening Tool for the analysis of health impacts associated with criteria emissions. In order to respond further to the comment, the Strategic Area Project Health Screening Tool was used to provide an estimate of health impacts associated with the proposed project's ROG emissions (see Appendix D to this Final EIR). It should be noted that the Strategic Area Project Health Screening Tool is intended to analyze projects within the SMAQMD's boundaries, thus, the closest strategic area location to the project site, Rancho Cordova, was selected.

As shown in Appendix D to this Final EIR, according to the Strategic Area Project Health Screening Tool, the proposed project could result in up to 0.085 premature deaths per year and 1.4 asthma-related emergency room visits per year due to the project's ozone emissions. For comparison, the background incidence of premature deaths per year is 30,386 due to ozone emissions and the background incidence of asthma-related emergency room visits per year is 18,419 due to ozone emissions. The project's contributions represent a very small increase over the background incidences of premature deaths and asthma-related emergency room visits due to ozone concentrations (0.00028 percent and 0.0076 percent, respectively).

The results of the Strategic Area Project Health Screening Tool are presented for informational purposes only, as the Strategic Area Project Health Screening Tool is based on data for the Sacramento Valley Air Basin and is intended to analyze projects within the SMAQMD's boundaries. The project site is located within the Mountain Counties Air Basin (MCAB) and is located within the EDCAQMD boundaries; however, the Strategic Area Project Health Screening Tool provides a reasonable estimate of health impacts associated with criteria emissions generated by the proposed project.

G-30 The comment asks for more information on the "green cleaning product education program" in mitigation measure AQ-1/AQ-2.

As presented in the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project (Draft EIR Appendix B), the implementation requirements included in mitigation measure AQ-1 were intended for both architectural coatings and the green cleaning product education program. Mitigation measure AQ-2 of the Draft EIR requires that the no-VOC paint requirement be included on the project improvement plans and in the HOA's Conditions, Covenants and Restrictions. For clarity, mitigation measure AQ-2 has been revised to reflect the language as presented in the Air Quality and Greenhouse Gas Impact Analysis, which made it clear the green cleaning program as also included on the improvement plans and HOA's Conditions, Covenants and Restrictions, as follows:

> "Prior to the issuance of building permits, the project applicant shall ensure that all initial and ongoing interior and exterior architectural coatings (i.e., paints) associated with the proposed

project have no volatile organic compounds (VOCs). A note stating products containing VOCs shall not be allowed shall be provided on the project's Improvement Plans and on the Informational Sheet filed with Final Subdivision Map(s) for review and approval by the El Dorado County Planning Department. Verification of the ongoing use of no VOC architectural coatings shall be ensured in perpetuity by the project's proposed homeowner's association (HOA) and shall be included in the HOA's Conditions, Covenants and Restrictions (CC&Rs).

In addition, a green cleaning product education program shall be made available to all residents and commercial tenants of the proposed project. The program shall include free educational materials such as brochures, pamphlets, checklists, etc., that provide information regarding the proper use of green cleaning products to be provided in information provided by the home buyer or commercial tenant.

The aforementioned requirements shall be noted on the project Improvement Plans, the Conditions, Covenants and Restrictions (CC&Rs), and the Informational Sheet filed with the Final Subdivision Map(s), and submitted for review and approval by the El Dorado County Planning Department."

The Mitigation Monitoring and Reporting Program adopted with the Final EIR will also identify enforcement approach, which will include an annual statement submitted to the County by the HOA identifying compliance with the mitigation measures.

G-31 The comment agrees with the Draft EIR's assessment of impacts to special-status species, including the tri-colored blackbird and urges the County to ensure the mitigation measure is implemented with care to ensure impacts are minimized. The comment also notes the purchase of mitigation credits needs to demonstrate they effectively mitigate the habitat loss on site. The comment is noted and no further response is required.

G-32 The comment requests a commitment to a no-disturbance buffer that is larger than the standard for tricolored blackbird, and is permanently protected through a conservation easement or similar legal mechanism. The comment also requests that the project's long-term management plan include specific measures to monitor and protect tricolored blackbird in perpetuity, not just during construction.

Though the project design has avoided impacts to the majority of tricolored blackbird nesting habitat, complete avoidance of blackbird nesting habitat onsite is not anticipated. Please see response to Comment A-7 for an explanation of the differences of impacts between the project and the RIA, and a summary of the resources avoided by the RIA. The Draft EIR discloses the potential impacts on the colony and discloses the project could cause colony abandonment and death of young or loss of reproductive success during nesting season and could result in tricolored blackbirds discontinuing use of this nesting habitat during Project construction or operation. As described in the Draft EIR (mitigation measure BIO-6), if these impacts are unavoidable, an Incidental Take Permit from the California Department of Fish and Wildlife will be required, and all impacts will be fully mitigated, which would include measures to avoid, minimize, and mitigate for the take of the colony. Please see Response to Comment A-7 for revisions to BIO-6 compensatory mitigation requirements. As stated in the Draft EIR (p. 3.3-28), measures in the Incidental Take Permit may go beyond those required by CEQA.

G-33 The comment expresses concern with the removal of vernal pools and suggests the RIA be modified to protect vernal pools.

The aquatic resource delineation identified five vernal pools features. Four of the vernal pool features would be impacted by either the project or the RIA. The features are small and located in isolated discrete occurrences; most of the vernal pool features impacted by the project and RIA are located near the middle of the property. Any avoidance of the features would also require protection of adjacent lands to maintain hydrologic inputs, and would require application of at least a 250-foot buffer. Given the orientation of the vernal pool features on site (isolated and far apart), application of a buffer to avoid impacts on these features would substantially limit the applicant's ability to develop the property in accordance with the project objectives. Also, please see Response to Comment A-7 that provides a description of the environmental resources avoided by implementation of the RIA. It is not practicable for the project or the RIA to avoid these features. Furthermore, it should be noted that protocol level surveys for listed branchiopods were completed, and no listed branchiopods were present on site.

G-34 The comment recommends robust mitigation for the northwestern pond turtle, including a requirement for protocol-level surveys prior to any ground-disturbing activities. The comment also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property.

Though the Draft EIR finds it unlikely that the species occurs on-site, mitigation measure BIO-4 defines measures that will be taken to avoid take of northwestern pond turtles that may occur. Mitigation measure BIO-4 includes pre-construction surveys, biological monitoring, and sterilization of equipment. Significant portions of the intermittent drainage will be retained as open space that could provide suitable habitat for northwestern pond turtle, if present. The open space is connected downstream and offsite to other open space areas.

G-35 The comment expresses concern with the project's reliance on offsite mitigation. The applicant is in the process of determining the best options for compensatory mitigation to offset the various impacts. Naming specific banks has proven to be difficult in that banks inventory is always changing. Also see the proposed changes to mitigation measure BIO-9, including potential for other types of compensatory mitigation (mitigation bank, in-lieu fee, or permittee responsible mitigation), which may occur on or offsite compensatory mitigation. In responses to various comments, revisions to compensatory mitigation mitigations requirements have been revised to provide greater flexibility including the potential use of on-site compensatory mitigation.

G-36 The comment expresses support for the biological resources mitigation measures (BIO-1 through BIO-7) but is concerned about long term enforceability, and recommends all mitigation measures be included as conditions of approval and for the County and HOA to ensure compliance in perpetuity. The County includes all mitigation measures as conditions of approval and, as the lead agency, is responsible for ensuring long-term mitigation compliance.

G-37 The comment reiterates support for the RIA as the most environmentally responsible option and urge the County to support the RIA to minimize impacts to the area's biological resources. While the comment broadly requests that proposed mitigation measures be strengthened, the mitigation measures as proposed and modified at the request of the California Department of Fish and Wildlife (see Responses to Comment Letter A), are mandatory, enforceable, and mitigate all impacts to less than significant. The comment is noted and no further response is required.

G-38 The comment recommends a more detailed summary of the types of tribal cultural resources found on the site. Public Resources Code section 21082.3 (Assembly Bill [AB] 52) requires local agencies and the applicant to protect the confidentiality of information received during tribal consultations and provides that the applicant "shall not disclose to a third party confidential information regarding tribal cultural resources." SB 18 similarly protects the confidentiality of tribal cultural resources. In consultation with Tribal Government Representatives during the AB 52 and SB 18 processes, clear directions were provided as to what level of information could be included for public consumption regarding information associated with the resources. While it is understood the public would like to confirm and verify the appropriateness of the findings, these determinations are made directly between the County and the respective Tribal Governments as required by law.

G-39 The comment agrees with the Draft EIR's analysis of historic resources separate from archeological resources and supports the Draft EIR's finding that impacts to archeological resources are significant and require mitigation. The comment is noted and no further response is required.

G-40 The comment is requesting the County define the roles and responsibilities of the archeological monitor and project contractor that the project's improvement plans and final map include the full text of the mitigation measures. To ensure the roles of the archeological monitor and the project contractor are clear, minor text edits to mitigation measures CUL-2 and CUL-4 have been made. Please see Chapter 2, Revisions to the Draft EIR for the revised text.

G-41 The comment is requesting more information regarding the scope of the archeological monitor during construction. Mitigation measure CUL-2 has been revised to clarify the scope of the archeological monitor. CUL-3 establishes when an archaeological monitor is required, which includes a 200-foot buffer within the resources identified. Please also see Response to Comment G-51.

G-42 The comment confirms the Draft EIR's analysis of cumulative impacts to cultural resources. The comment is noted and no further response is required.

G-43 The comment is requesting it be noted that while the impacts to cultural resources would be the same under the RIA as the proposed project it would be somewhat less intense since the RIA has fewer residents that could disturb unknown resources in areas with trails and open space. The comment is requesting the County take this into consideration when evaluating the project. The comment is noted and will be reviewed by the County's decision-makers. No further response is required.

G-44 The comment recommends the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards. This comment does not address the adequacy of the Draft EIR but is noted for the record and will be considered by the decision-makers. While minimum standards are required to be met, the project will strive to implement energy-efficient products and technologies when implementing the project. This is not only desirable for future buyers but also benefits the marketing of the community. Because the impact was less than significant with compliance with existing standards, imposing requirements that exceed existing standards as a CEQA mitigation measure would not be appropriate.

G-45 The comment is noting the project's commitment to an all-electric development but notes the property owners may prefer to choose their own source of energy. The project is designed to be all-electric to be consistent with SMAQMD best management practices (BMPs). As noted on pages 3.5-15 and 3.5-16,

the project would also comply with the state's Title 24 energy efficiency standards and it is anticipated residences would also include solar panels. Consistent with the SMAQMD BMPs, the project would also be required to comply with mitigation measure GHG-1, which requires the project be all-electric, and natural gas could be utilized only if all-electric is not enforceable or commercially feasible, as explained in Responses G-21 and G-54.

G-46 The comment requests more detail on the specifics of the proposed electric vehicle (EV) infrastructure. All residential units will be prewired with EV charging within garages as required by California Building Codes. There is potential to have EV charging stations in a centralized area such as the public park or at the proposed community center within the plan area. The feasibility and location of infrastructure to allow for additional EV charging stations will be determined during improvement plan preparation and will comply with mandatory requirements in effect at that time.

G-47 The comment notes support for the RIA, in part because it will reduce energy demand due to the reduction in units as compared to the proposed project and is an all-electric development. The comment is noted and no further response is required.

G-48 The comment agrees with the Draft EIR's conclusion that impacts due to seismic and soils are less than significant, due, in part, to compliance with the project's Geotechnical Study and a final design-level geotechnical investigation report that is required to be prepared by the County. The comment suggests the project's conditions of approval include preparation of a final design-level geotechnical report to ensure the project would not result in any impacts based on the underlying geology of the site. The County requires the project prepare this report so it will be included in the project's conditions of approval.

G-49 The comment refers to potential hazards due to the likely presence of soft soils on the site and requests this work be overseen by a certified geotechnical engineer and approved by the County before any foundations are laid. As noted in the Draft EIR on page 3.6-15, a final design-level geotechnical investigation report, as required by the County would be prepared that would provide detailed recommendations specific to an over-excavation and re-compaction program. The County's building permit process also requires geotechnical report recommendations be incorporated into the project's design specifications. A licensed engineer would prepare the design-level geotechnical report which would also be reviewed and approved by the County before the start of construction. This would ensure the project would be designed and constructed to avoid impacts due to unstable soils.

G-50 The comment recommends the project's final grading plans be available for public review to confirm the project avoids sensitive areas that contain slopes and minimizes erosion. Once a grading plan is filed with the El Dorado County Planning and Building Department, plans can be viewed via the County's eTrakit system.

G-51 The comment is suggesting an Unanticipated Discovery Protocol be included in the project's conditions of approval in the event any paleontological resources are unearthed during construction. As discussed under Impact 3.6-6 starting on page 3.6-16, the County is predominantly underlain by igneous (volcanic) material (including the project site) and sedimentary deposits that contain paleontological resources are virtually non-existent in the County. Therefore, the potential for the project to unearth any fossils or other paleontological resources is extremely unlikely. The mitigation measures will be included as part of the Mitigation Monitoring and Reporting Program, and the project conditions of approval require compliance with the Mitigation Monitoring and Reporting Program.

G-52 The comment agrees with the Draft EIR's analysis of geologic conditions and soils and finding of less than significant assuming project approval includes all recommended geotechnical studies, grading plans and soils compaction plans as enforceable conditions of approval. The project's conditions of approval will require the project to comply with state law as well as the County's construction and building requirements.

G-53 The comment is concerned that the Draft EIR finds the project's operational GHG impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. As presented in the Draft EIR, as well as the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project (Draft EIR Appendix B), for evaluating operational GHG emissions, SMAQMD recommends a two-tiered framework of analysis for new projects. All development projects are required to implement Tier 1 measures (BMP 1 and 2). In addition, if operations of the proposed project would exceed 1,100 metric tons of CO_2 equivalent (MT CO_2e) per year after implementation of the Tier 1 measures, then the project is required to implement Tier 2 measures (BMP 3). Thus, SMAQMD's thresholds rely on implementation of BMPs. The 1,100 $MTCO_2e$/yr is a screening level threshold that is only used to determine whether the project is required to implement BMP 3.

The commenter is correct in that Table 3.7-5 of the Draft EIR shows the proposed project's operational emissions exceeding the 1,100 $MTCO_2e$/yr as a screening-level threshold, indicating that BMP 3 is required. The Draft EIR also includes an analysis of project-specific VMT, consistent with SMAQMD BMP 3. As discussed within the Draft EIR, as well as the Air Quality and Greenhouse Gas Impact Analysis prepared for the proposed project, the proposed project would be consistent with BMP 3. In addition, the Draft EIR includes mitigation measure GHG-1 to ensure that the proposed project is consistent with SMAQMD BMP 1 and BMP 2. Therefore, with implementation of mitigation measure GHG-1, the Draft EIR concluded that the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and a less-than-significant impact would result.

Further, as discussed under Impact 3.7-2 of the Draft EIR, the proposed project would be consistent with the 2017 Scoping Plan, the 2022 Scoping Plan, and the Sacramento Area Council of Governments 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy. Thus, the Draft EIR concluded that the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and with implementation of mitigation measure GHG-1, a less-than-significant impact would result.

Based on the above, the conclusions within the Draft EIR related to GHG emissions are not inconsistent with the data presented therein.

G-54 The comment is concerned about the language in mitigation measure GHG-1 that allows for the use of natural gas if an all-electric design is found to be "not enforceable or commercially feasible."

The comment does not question the GHG analysis prepared for the proposed project, nor does it question the applicability or feasibility of mitigation measure GHG- 1. The Air Quality and Greenhouse Gas Impact Analysis included in Appendix B of the Draft EIR explains why mitigation measure GHG-1 may not be "enforceable" in light of the decision in *California Restaurant Association v. City of Berkeley* (9th Cir. 2023) 65 F.4th 1045, opinion modified (9th Cir. 2024) 89 F.4th 1094, which is discussed in detail on page 23 of the Air Quality and Greenhouse Gas Impact Analysis. The Air Quality and

Greenhouse Gas Impact Analysis explains that, in that case, “the Ninth Circuit recently held that the Energy Policy and Conservation Act expressly preempted an ordinance banning natural gas piping within new buildings for appliances covered by the Act unless narrow exceptions applied.” While GHG-2 remains enforceable at this time, the Air Quality and Greenhouse Gas Impact Analysis recognized that a similar challenge could be brought in the future and “a future court decision could find that all-electric mitigation requirements or GHG emissions thresholds are similarly preempted for covered appliances.” If that occurred, mitigation measure GHG-2 would not be “enforceable.” Page 24 states: “The feasibility of BMP 1 also relies on the adequate availability of electricity at the time of development” as implementation of GHG-2 would not be commercially feasible if adequate electricity or similar market conditions at the time of development prevent construction with all-electric. The Mitigation Monitoring and Reporting Program adopted with the Final EIR identifies responsibility for enforcing the mitigation measure, thus providing that the County department responsible for enforcement would make such determinations. If it is determined that the use of all electric appliances is not enforceable or commercially feasible, mitigation measure GHG-2 then requires GHG offsets to mitigate the emissions from any use of non-electric appliances, thereby fully mitigating for the impact.

G-55 The comment is noting concerns with use of off-site mitigation credits to reduce GHG emissions and recommends if off-site credits are used the County hold a public hearing to ensure the credits are enforceable and the community can comment on the plan. As described under mitigation measure GHG-1 on page 3.7-28, in the event the use of all-electric components is not enforceable or commercially feasible the project is designed to be retrofitted to use natural gas. If this were to occur, emissions associated with use of natural gas will be calculated by a qualified professional and will be submitted to the County for review along with a third-party reviewer. GHG credits must conform to a California Air Resources Board (CARB)-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972 and, as required by state law, must "demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional." Any GHG credits are required to meet stringent state standards to ensure these standards are met, as detailed in mitigation measure GHG-1. Therefore, the County does not feel holding a public hearing is required.

G-56 The comment is expressing support that the project is consistent with state and regional GHG reduction plans and supports the RIA because it reduces VMT. The comment is noted and no further response is required.

G-57 The comment agrees with the Draft EIR's analysis of cumulative GHG impacts and finding of less than significant given that the project's emissions would be below the SMAQMD thresholds. The comment is noted and no further response is required.

G-58 The comment expresses support for the project, particularly the RIA, for its consistency with state and regional GHG reduction plans. The comment also recommends a transparent process for review of off-site mitigation credits. Please refer to Response to Comment G-55 regarding use of off-site mitigation credits.

G-59 The comment expresses appreciation that the project applicant has engaged with the Environmental Standing Committee and has been so forthcoming with updates to both the committee and the community. The comment is noted and no further response is required.

G-60 The comment expresses concern with the long-term maintenance and funding required to implement the Stormwater Drainage Master Plan, BMPs, and Low Impact Development (LID) features.

The preliminary drainage report (DR) prepared for the proposed project (included as Appendix F to the Draft EIR) describes the measures that are proposed to address BMPs and LID features including bio swales and detention basins. If the project is approved, the final designs are developed and are supported by a comprehensive DR and/or series of DRs depending on project phasing. Final DRs include a detailed Maintenance Matrix that describes required maintenance activities and frequencies. Maintenance costs are estimated and are folded into the HOA documentation with defined sufficient funding to support those activities.

G-61 The comment recommends that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures and requests analysis of how these features will specifically protect Carson Creek Preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. The comment recommends that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs resulting from project construction or operation.

As described in Draft EIR Section 3.8, Hydrology and Water Quality, the project proposes to construct two hydromodification basins that are designed to detain the 85th percentile 2-year storm 24-hour event. Hydromodification requirements related to the 2-year storm event are designed to control the duration and magnitude of runoff to prevent downstream erosion and protect aquatic habitats. The core principle is to manage post-development runoff so it matches pre-development conditions, particularly for frequent, smaller storms that cause the most geomorphic damage over time.

10-year and 100-year storm events are addressed in the Carson Creek Regional Drainage Study (1996 and 2005 Update) which is included as an attachment in Appendix F to the Draft EIR. The Creekside project is included and consistent with those reports. Final DRs will be prepared in connection with project improvement plans and will be designed to be consistent with said studies.

G-62 The comment asks for more detail on the specific calculations and modeling used to support the conclusion that the Stormwater Drainage Master Plan will mitigate effects of increase impervious surfaces, including detail on how the system will handle a 'first flush' event which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system.

The 10- and 100-year flows for this site were evaluated with the Carson Creek Regional Drainage Study 2005 Update (included in Appendix F to the Draft EIR) and the study shows that additional storage (detention ponds) would provide no notable mitigation of peak flows. Key node 10, which is downstream of the project, shows a decrease of flow by 400 cubic feet per second (cfs). Preliminary calculations find that the proposed densities could increase the discharges by 50±cfs that are well within the 400 cfs reduction. Final DRs will be prepared in connection with improvement plans that will refine the numbers and will remain significantly below the parameter noted above.

The project is located on the lower end of the Carson Creek Regional shed. The objective with this property is to discharge the runoff from this development before the upstream drainage area reaches the property. The detention pond(s) as proposed are designed to meet the hydromodification

requirements that mitigate the 2-year, 24-hour storm alone. No detention is proposed to provide mitigation for the 10- and 100-year flows as noted hereinbefore.

Water quality storm filter boxes will be installed throughout the project that are designed to capture "first flush" pollutants. The boxes and filters are sized by defined drainage management areas (DMAs). The DMAs will be defined in connection with the project improvement plans that will identify and size the Storm Filter boxes and water quality swales. The Final DRs and improvement plans will include a Post Construction Storm Water Quality Plan that incorporates all permanent BMP and LID measures that will include a maintenance activity matrix.

G-63 The comment notes the El Dorado Hills APAC agrees with the Draft EIR's finding that the project will not interfere with groundwater but requests the final plan clarify how the project's LID features will protect groundwater from contamination. Groundwater is anticipated to occur at depths greater than 100 feet below the ground surface with the potential for perched water to be located closer to ground level (Draft EIR, p. 3.8-2). As discussed under Impact 3.8-1 starting on page 3.8-21, the County is required to implement a Post-Construction Storm Water Management Program, per the Phase II Small MS4 Permit and the County's Stormwater Management Plan. To protect water quality and the groundwater basin, the project is required to retain and treat runoff by implementing LID features that would include infiltration, evapotranspiration and/or harvesting/reuse treatment systems. In addition to LID features, the project would include design features to retain and treat runoff through water quality bioswales, detention basins and a hydromodification pond. These features would be located strategically throughout the site to provide water quality treatment. County staff is required to confirm these features are included and shown on the final project maps in compliance with the MS4 Permit requirements.

G-64 The comment requests the project approval includes long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of Carson Creek Preserve, downstream of the project site. The comment also reiterates support for the RIA because it would reduce the amount of impervious development. The Draft EIR addresses the potential for the project to impact the Carson Creek Preserve and explains the project is required to comply with the provisions of the Construction General Permit, which includes design, management and monitoring requirements to protect water quality during construction. This includes preparation of a Stormwater Pollution Prevention Plan and compliance with BMPs, as required by state law. To further protect water quality in Carson Creek, the project's LID features along with water quality bioswales, detention basins and hydromodification pond would all work to retain and treat onsite stormwater and settle any entrained runoff pollutants to reduce water quality degradation in the Carson Creek Preserve (Draft EIR, p. 3.18-22). The County's permitting and inspection process and compliance with state law would ensure construction and operation of the project would not result in a significant impact to water quality, including the Carson Creek Preserve. All of these requirements will be included in the project's conditions of approval or be included on any final project maps.

G-65 The comment requests that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area.

Appendix B of the Specific Plan addresses compliance with the General Plan Goals, Policies and Objectives. Prior to approval, the Board of Supervisors is required to find that the project is consistent with the General Plan. Appendix B states the following regarding General Plan consistency: The project

site is located within the El Dorado Hills Community Region Boundary and proposes development that is consistent with Community Region development in regard to intensity and density. There is adequate infrastructure available to serve the project and provides for continued growth in an area identified for urban land uses. The project is consistent with the Carson Creek Specific Plan and Valley View Specific Plan as they are also Adopted Plans. The proposed project contains residential, parks and open space land use designations and similar lotting to the adjacent plans. The property to the north provides a substantial buffer to uses within the El Dorado Hills Business Park which does contain many uses that are compatible with residential development such as schools, churches, and restaurants. The 215-acre property to the south is owned by the El Dorado Union High School District and is contemplated as a potential future high school site.

Please also refer to Draft EIR Section 3.9, Land Use, Population and Housing for a discussion of consistency with land use plans.

G-66 The comment requests a more detailed analysis of compatibility with the existing El Dorado Hills Business Park to the north and industrial uses to the south. As discussed in Draft EIR Section 3.9, the project is designed to avoid land use incompatibilities that could potentially result in physical environmental effects. For example, proposed residential uses located to the west of El Dorado Hills Business Park access road would be buffered by an extensive open space system that varies in width from approximately 150-feet to 300-feet. This would reduce the potential for operations of the Business Park, such as those involving truck noise, to impact sensitive receptors at the project site. Proposed residential uses located in the area between the access road and Latrobe Road are located adjacent to an existing 25-acre undeveloped parcel that is owned by the project applicant, and any future development of this parcel would be strictly controlled by the project applicant and designed to minimize conflicts between the development and the CVSP. Additionally, an open space buffer is also located along the entire southern property line of the CVSP to ensure compatibility with existing rural residential and light industrial uses to the south (p. 3.9-15)

Within the El Dorado Hills Business Park there are a multitude of compatible uses including educational schools, swim schools, sports and dance academies, performing arts studios and theatres, massage and physical therapists, gyms and fitness centers, dentists, estheticians, barber shops, restaurants, and churches that would be supported by residential use. The John Adams Academy school is along the plan area's northeast boundary which is a compatible use to a residential project.

Additionally, the property directly north of the project is owned by the project applicant with the ability to ensure that any future development of the parcel is controlled to minimize conflicts. The applicant has no current plans to develop that 25-acre parcel. The majority of the southern boundary is owned by the school district and is contemplated as a potential future high school site which is compatible with a residential project.

G-67 The comment is addressing the reduction in the total number of residents under the RIA as compared to the project and urges the County to approve the RIA because it would fewer impacts to public services, schools and traffic. The comment indicates that the RIA reduces the number of anticipated residents from 2.314 to 1,540, but 1,540 is the number of residents anticipated with the Active Adult Option analyzed as an option with the proposed project (page 3.9-17). The RIA is anticipated to reduce the number of residents from 2,314 to 1,305 (see Chapter 2, Changes to the Draft Environmental Impact Report). The comment is noted and no further response is required.

G-68 The comment is noting support of the RIA because it reduces secondary, or indirect effects associated with population and housing. The comment is noted and no further response is required.

G-69 The comment is expressing support for the project's mix of housing types and ADUs and recommends development of ADUs be encouraged to provide more diverse and affordable housing options. The comment is noted and no further response is required.

G-70 The comment is reiterating support for the RIA due to the reduction in population and benefits to the community's infrastructure and quality of life. The comment is noted and no further response is required.

G-71 The comment requests a more detailed visual analysis of proposed noise barriers and requests the barrier design be visually compatible with the surrounding environment.

Photos showing the potential types of noise barrier that are visually compatible with the natural surroundings have been provided that could be constructed adjacent to Latrobe Road (see Response to Comment G-18). As described in Draft EIR Section 3.10, Noise, and the Noise & Vibration Study prepared by Bollard Acoustical Associates, Inc. (included as Appendix G to the Draft EIR), masonry wall, earthen berm, or the combination of the two could be used for sound attenuation subject to review by an acoustical consultant. Design and construction materials of the wall will be determined while preparing improvement plans.

G-72 The comment requests specific rules and regulations for park hours and usage to be enforced by the HOA. The proposed parks are intended to be open from sunrise to sunset with no field lighting that would allow for use at night. This would be adopted in the CC&Rs for the project area and enforced by the HOA. Additionally, potential noise generating uses of parks can be controlled and minimized by the type of park programming which is determined during improvement plan preparation.

G-73 The comment requests the County's permit review process for live or amplified music include public hearings allowing for community input on potential noise impacts. The comment also requests strict conditions on hours of operation and decibel limits, and a monitoring program for noise levels.

The proposed project requires any commercial activity featuring live or amplified music to have a noise study prepared prior to any permit approval as to demonstrate compliance with County Noise Standards (mitigation measure NOI-3). Compliance with mitigation measure NOI-3 would ensure the project complies with the County's General Plan exterior noise level standard of 60 A-weighted decibels day/night average sound level at the single-family low- and medium-density residential outdoor activity areas to ensure noise from outdoor speaker systems, including live performances, at any commercial uses is reduced to less than significant. For the proposed project, Table A.2 of the CVSP identifies permitted and conditionally permitted commercial uses and, for any conditionally permitted uses, the noise study would be part of the Planning Commission review of the CUP. For the RIA, the limited potential future commercial uses in Table A.2 of the CVSP-RIA all require a CUP and PD and, if live music is included, a noise study consistent with NOI-3 would be required and the discretionary approval of the CUP and PD would include a public hearing before the Planning Commission to allow for community input on any proposed use. to allow for community input on any proposed use.

G-74 The comment requests mitigation measure NOI-5 be a condition of approval for any residential unit predicted to be exposed to noise levels that exceed the interior noise standards. While not required to mitigate an environmental under CEQA, the applicant has agreed to implement NOI-5 and this mitigation measure will be included in the Mitigation Monitoring and Reporting Program for the project which is designed to verify compliance with the mitigation measures adopted in connection with project approval.

G-75 The comment agrees with the Draft EIR's finding of less than significant for noise associated with project operation and indicates support for the RIA because it reduces daily vehicle trips further reducing noise associated with project operation. The comment is noted and no further response is required.

G-76 The comment agrees with the Draft EIR's analysis of noise but requests more detail and transparency be provided for the implementation and enforcement of the mitigation measures. The Draft EIR includes mitigation measure NOI-1 that requires construction-related noise measures be included as feasible and practical; mitigation measure NOI-2 that requires a noise study be prepared and submitted with the tentative map that verifies and demonstrates noise from park activities would not exceed County standards; and mitigation measure NOI-3 that requires a noise study be prepared in the event commercial uses are developed that include live of amplified music. The County will ensure implementation and compliance with all mitigation measures as the lead agency.

G-77 The comment is referencing the project's FSP and is requesting the plan be provided for public review. The FSP was provided in Appendix J of the Draft EIR to allow public review. The comment is noted and no further response is required.

G-78 The comment is requesting more analysis be provided that addresses how the project's residents will be integrated into the West Slope Patrol's service area and if additional patrols would be required to maintain response times and how the project's tax revenues would be transmitted to the law enforcement services. The El Dorado County Sheriff's office is responsible for providing law enforcement to unincorporated lands in the "west slope" which includes the area west of Echo Summit. The east slope includes the area east of Echo Summit in the Tahoe basin. The sheriff's office includes three substations in El Dorado Hills, Georgetown and Cameron Park with the El Dorado Hills substation located approximately 3 miles from the project site (Draft EIR, p. 3.11-2). Officers from the El Dorado Hills substation would serve the project site, as discussed in the Draft EIR (Draft EIR, p. 3.11-17). The project would add new residents to the County but would not require the need to construct new law enforcement facilities or hire new officers. Adequate law enforcement would be provided to the project site and would include patrols and responding to emergency and non-emergency calls. The Sheriff's office does not have adopted response times but rather staffing goals of one deputy per 1,000 residents. The County pays for law enforcement services through a combination of funds provided from the General Fund and other special revenue funds. Property taxes generated by future residences would go into the County's General Fund to pay for required public services. The County reviews its General Fund annually and allocates money to pay for required services. The 2025/26 budget for the Sheriff's Department adopted in June 2015 is over $112 million and represents an increase of 4.9% as compared to the prior budget. As more development occurs within the County the funds are assessed and allocated to ensure adequate public services are provided.

G-79 The comment is addressing the increase in demand for school services and recognizes that the payment of school fees is considered adequate mitigation for the purposes of CEQA it does not address the physical and logistical reality of generating new students. The comment notes the RIA would reduce the number of students and would address the physical and logistical aspect. The comment is noted and no further response is required.

G-80 The comment agrees with the Draft EIR's finding that the project's increase in high school students can be accommodated within the El Dorado Union High School District and goes on to note enrollment forecasts have not necessarily been accurate. The comment is noted and no further response is required.

G-81 The comment requests the final project plans include a detailed conceptual design for the proposed parks and requests that the public have access to the parks even if they are maintained by a private HOA.

Park programming will be determined prior to construction of the parks depending on the phasing and implementation of the project. The specific plan proposes public parks and trails within the plan area to meet the park land dedication requirements. The project applicant has prepared conceptual park exhibits that demonstrate the potential park uses at each of the proposed parks, included as Appendix B to this Final EIR. To receive credit for the privately owned and maintained parks or trails that remain publicly accessible, the County will ensure that access is made available through the conditions of approval.

G-82 The comment agrees with the Draft EIR's analysis of impacts to public services but requests a more transparent and detailed plan for mitigation and funding be provided. The comment also reiterates support for the RIA because it decreases the number of students. The Draft EIR does not identify any impacts requiring mitigation for schools or any other public services. The project is required to pay all County development fees, including school impact fees. In addition, local school districts receive funding from federal, state and local sources to fund staff and schools. The comment is noted and no further response is required.

G-83 The comment expresses support for the Draft EIR's finding of less than significant for an increase in VMT. The comment also expresses support of the RIA and recommends the County adopt the RIA. The comment is noted and no further response is required.

G-84 The comment acknowledges that CEQA no longer requires an analysis of LOS but is requesting the project's LOS analysis be provided to allow public review. The project's LOS was included for informational purposes only in Appendix H of the Draft EIR that includes the project's Transportation Impact Study.

G-85 The comment requests a clear commitment on the specific timeline and funding mechanisms for all off-site roadway and intersection improvements. The project has an approved Traffic Impact Study (Appendix H to the Draft EIR) that identifies the traffic improvements needed to mitigate impacts to traffic from the project. As part of the project's conditions of approval the County Department of Transportation will condition the project with specific traffic improvements to mitigate the traffic impacts generated by the implementation of the Project. These conditions will include the specific timing and funding mechanisms for which the improvement will be constructed. The traffic study analyzing the non-CEQA issue of LOS identifies when each improvement is needed based on traffic modeling.

G-86 The comment requests more detail on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line and requests this be adopted as a formal component of the Specific Plan.

El Dorado County and the El Dorado County Transportation Commission in multiple studies and documents have identified a proposed Class I shared-use path along Sacramento- Placerville transportation corridor along the abandoned railway corridor that runs along the Sacramento County El Dorado County line. The project's proposed Class I trail would provide a connection into the Carson Creek development to the west which includes the future 30-acre regional park that is adjacent to the proposed Class I shared-use path identified by the County. The ultimate implementation of the trail system associated with the railway corridor will be determined by El Dorado County and El Dorado County Transportation Commission. In response to the comment the applicant has overlayed the location of the Project in relation to the proposed trail system from El Dorado County, which shows the Project connects to existing trails on Latrobe Road in Blackstone, through future connections to Heritage at Carson Creek, and could connect to the planned future Class I Shared-Use Path proposed by the County.

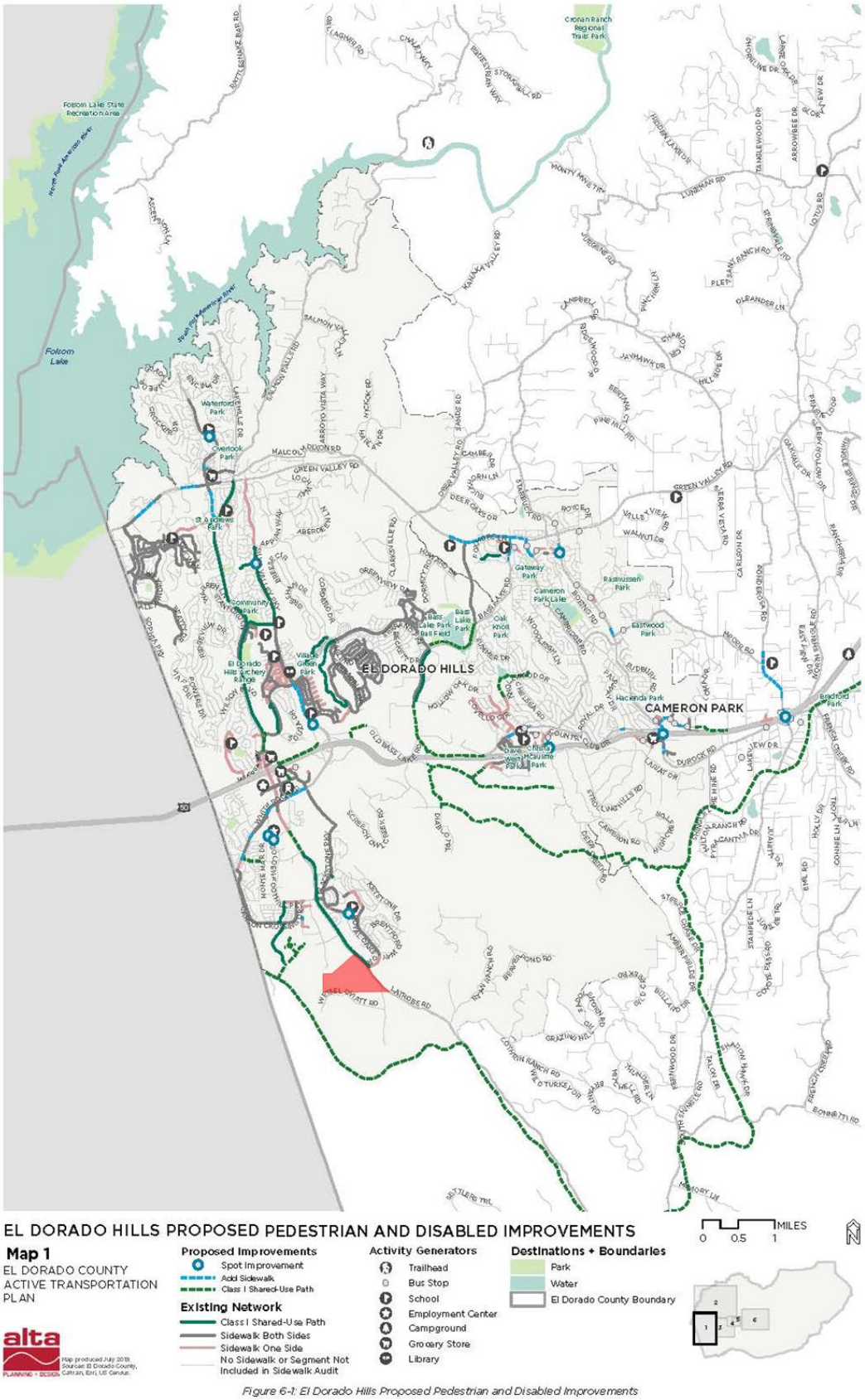


Figure 6-1: El Dorado Hills Proposed Pedestrian and Disabled Improvements

G-87 The comment requests a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency.

Emergency access for the project is described in Section 3.15, Wildfire (Impact 3.15-1) of the Draft EIR and is also discussed in detail in the FSP for the project (included as Appendix J to the Draft EIR). Emergency vehicle access can be described as the means (e.g., roads, bike paths, trails, etc.) by which firefighters can enter an area to quickly mitigate a wildfire incident before it spreads to adjacent properties and critical assets/infrastructure at risk. Joint efforts to develop and maintain ingress/egress for local evacuation and fire suppression response are required to ensure that both public and firefighter safety is provided.

The main entry/exit point and emergency response routes to the Project will be Royal Oaks Drive, identified in Figure 11 of the FSP as being Emergency Vehicle Access (EVA) Point B, off of Latrobe Road. Emergency vehicle access is also available from Latrobe Road via Access Points A and C. Access Point D is an EVA only road connection located on the west side of the Project that serves as ingress/egress from the Heritage at Carson Creek community. Access Point E is an EVA-only road connection located on the north side of the Project via a private road connection near 5220 Robert J Mathews Drive.

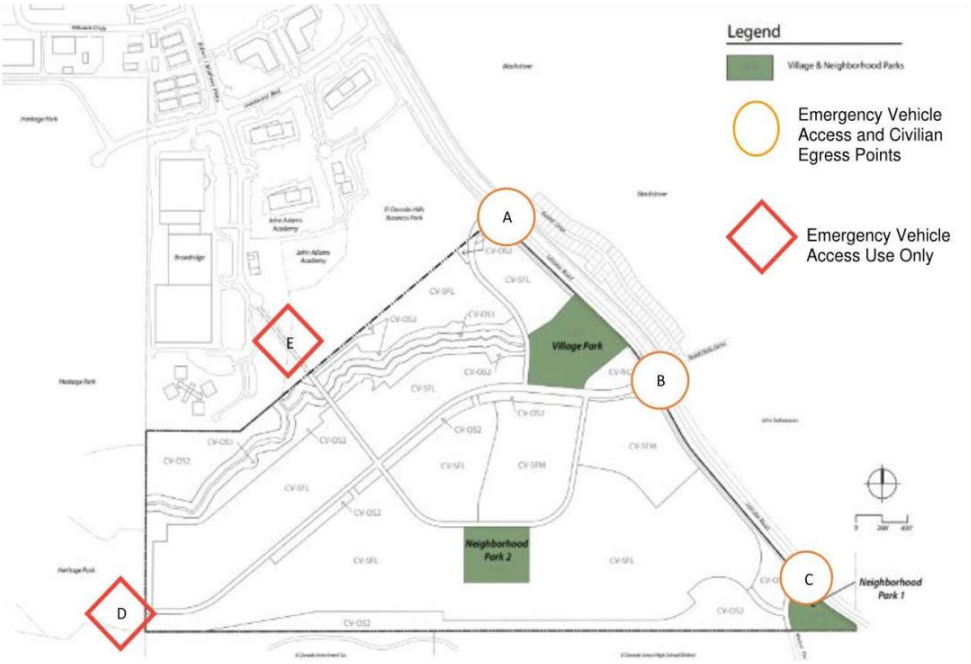


Figure 11 of the FSP (Appendix J to the Draft EIR)

The EVA connection (EVA E) to the El Dorado Hills Business Park is required by Title 14, Section 1273.08 (Dead-End Roads) of California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 2 (State Minimum Fire Safe Regulations). The EVA will provide an access connection for emergency vehicles, and will also serve as a Class I bike path into the El Dorado Hills Business Park. Access to this roadway will be limited to emergency vehicles, bicycles, and pedestrians. No automobile traffic, except during a potential evacuation, would be allowed to use this roadway. The roadway is proposed to be 28 feet wide with 20 feet of paving. As described in the FSP, the proposed roadway would limit vehicular access with knock down bollards, security gate with a Knox box, or another

approved mechanism approved by the El Dorado Hills Fire Department. The authority to utilize the emergency vehicle access road during an evacuation will be determined by Law Enforcement and Fire Department.

G-88 The comment agrees with the findings of the Draft EIR's transportation analysis but requests more detail and transparency on funding for roadway improvements. The comment also reiterates support for the RIA. Please see Response to Comment G-6 regarding proposed off-site roadway improvements.

G-89 The comment acknowledges and appreciates the tribal consultation process undertaken by the County and the applicant and respects the wishes of the tribes to keep specific information private. The comment is noted and no further response is required.

G-90 The comment recognizes the importance of protecting and preserving tribal cultural resources and supports the RIA because it is committed to protecting cultural resources. The comment is noted and no further response is required.

G-91 The comment supports approval of the RIA because it avoids a majority of the tribal cultural resources on the site and prioritizes avoidance and protection of tribal cultural resources. The comment is noted and no further response is required.

G-92 The comment requests the project conditions of approval include a binding requirement for tribal monitoring during all ground-disturbing activities in areas identified as sensitive, and a commitment that in-place preservation will be the priority for any resources found.

In consultation with Tribal Governments as part of AB 52 and SB 18, mitigation measures TCR-1 through TCR-5 were included as part of the project. These mitigation measures will be included as part of the Mitigation Monitoring and Reporting Program and the project conditions of approval. Specifically, TCR-2 requires tribal monitoring of sensitive areas, identified in the EIR as the “Monitoring Area.” TCR-3 and TCR-5 would ensure that treatment of the TCRs are approved by the Tribal Historic Preservation Officer or Tribal Government Representative, including preservation in place if feasible, and the relocation of any resource is done in coordination with Tribal Government Representatives.

G-93 The comment reiterates support for the RIA and agrees with the Draft EIR's finding of significant for its contribution to cumulative impacts to tribal cultural resources. The comment is noted and no further response is required.

G-94 The comment requests a more explicit statement from the El Dorado Hills Irrigation District (EID) regarding the specific steps being taken to expand the El Dorado Hills Water Treatment Plant to meet the cumulative demand from new development, including this project.

EID issued the January 8, 2024, Facilities Improvement Letter (FIL) for the project, which states it has sufficient water to serve the project. Since the preparation of the Water Supply Assessment cited in the Draft EIR, EID has also prepared and approved a Water & Recycled Water Master Plan with updated water supply and demand data. This plan was approved in June 2024 and is the most recent data available and confirms the sufficient capacity to serve the project as stated in the FIL. EID has confirmed it has long-term plans to increase capacity of the Water Treatment Plant, but, as determined by the FIL, they are not required to be completed in order to serve the project.

G-95 The comment is concerned about another Draft EIR being prepared by EID for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz.

The CVSP project is not affected by the EID's Draft EIR being prepared. This proposed project by EID could potentially provide additional water to the El Dorado Hills community. Regarding the water delivery to the CVSP there are multiple connection points adjacent to the project site for connection including a 16-inch water main at Latrobe Road and Royal Oaks Drive, a 16-inch water main in Robert J Mathews Parkway to the north where the emergency vehicle access/pedestrian connection is located, and an 8-inch water services at Latrobe Road and Royal Oaks Drive. This allows for multiple connection points to service the project area providing a more reliable looped system for delivery of water.

G-96 The comment notes the Active Adult Option reduces water demand and represents a substantial water savings for the community. The comment reiterates support for the RIA, which would reduce water usage even more than the Active Adult Option, and urges the County to approve this alternative to the project. The comment is noted and no further response is required.

G-97 The comment requests confirmation that the El Dorado Hills Wastewater Treatment Plant expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand.

The wastewater generated by the project is not anticipated to require expansion of the EID Wastewater Treatment Plant, as there is existing capacity to serve the project as described in Section 3.14 Utilities and Service Systems. Development impact fees paid directly to EID will be used at the discretion of EID and it cannot be determined if those fees will be used directly to fund specific projects within the EID capital improvement program.

G-98 The comment recommends that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met.

Conditions of approval will address the proper disposal of waste generated while the project is being constructed ensuring compliance with the County's Construction and Demolition Debris Recycling Ordinance. The future residents will be provided with services from Waste Connections of California, Inc., dba, El Dorado Disposal Service pursuant to the applicable existing franchise agreement. Compliance with state diversion and composting requirements would apply as they do throughout the County.

G-99 The comment notes the Active Adult Option generates less solid waste as compared to the project. The comment reiterates support for the RIA. The comment is noted and no further response is required.

G-100 The comment request confirmation that the project's commitment to undergrounding new utility lines extends to all new utility distribution lines associated with the project, both on- and off-site.

As required by the California Public Utilities Commission any new facilities added by the development are required to be co-located underground with other utilities within road right of ways or public utilities easements.

G-101 The comment agrees with the utilities analysis in the Draft EIR and the finding of less than significant impacts. The comment reiterates support for the RIA. The comment is noted and no further response is required.

G-102 The comment agrees with the Draft EIR's finding that the project would result in a potentially significant wildfire risk. The comment supports the proposed mitigation strategy to address wildfire impacts. The comment also highlights the Draft EIR's conclusion that the Active Adult Option would reduce exposure to wildfire hazards by decreasing the number of residents by 33.5%. It is worth noting that the RIA would reduce the number of residents by 57%, which is a greater reduction than the Active Adult Option. The comment is noted and no further response is required.

G-103 The comment requests a quantitative analysis of evacuation times for the project and the surrounding area under a worst-case wildfire scenario.

The proposed project is in a State Responsibility Area with a moderate fire hazard severity risk. A high fire hazard severity risk area overlays only the extreme southeast corner of a park lot, located east and south of Wetsel-Oviatt Rd and west of Latrobe Road. The Attorney General's *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act* provides: "For projects located in high wildfire risk areas that present an increased risk of ignition and/or evacuation impacts, evacuation modeling and planning should be considered and developed at the time of project review and approval—when there is greater flexibility to modify a project's design, density, siting, and configuration to address wildfire considerations—rather than deferred to a later stage of the development process."[1] This same recommendation for a quantitative analysis is not made for developments within moderate severity fire risk zones.

Neither the State of California, nor the County of El Dorado, have established criteria as to when evacuation modeling will be required, or how model simulations are to be developed, for new development projects. In moderate fire hazard severity risk zones, projects generally consult with local fire officials regarding the need for analysis and ensure that adequate emergency access to the project is provided. The proposed project is not likely to impact wildfire evacuations because the project is in a moderate fire hazard severity zone, no extenuating circumstances were identified during consultation between the FSP consultant (Philips Consulting Services) and Fire officials, and, as detailed in the Draft EIR and FSP, there are multiple evacuation routes. As described in Draft EIR Section 3.15, Wildfire, and the FSP prepared for the project (Appendix J to the Draft EIR), evacuation options from the project site include:

- From Access Points A, B, and C: Residents may evacuate to Latrobe Road and travel either north on Latrobe Road to White Rock Road or U.S. Highway 50 both east west connectors that allow for evacuation.
- From Access Point D: During an emergency Public Safety Officials can utilize the access connection from the Heritage Master Plan Community to access the Project. The Heritage Master Plan Community has existing and proposed connection points into the El Dorado Hills Business Park and to Carson Crossing Drive that connects to White Rock Road.

[1] Bonta, Rob (2022) Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act, available online at: https://oag.ca.gov/system/files/attachments/press-docs/Wildfire%20guidance%20final%20%283%29.pdf.

- From Access Point E: During an emergency Public Safety Officials can utilize the bicycle and pedestrian connection into the El Dorado Hills Business Park as a vehicular evacuation route to the north of the project that connects to Robert J Mathews Parkway which has multiple connection points to Latrobe Road and to White Rock Road that can be used for evacuation.

As stated in the FSP, neither the project nor the RIA "increase the wildfire risk or adversely impact the evacuation routes available to the community." The FSP also indicates that County Office of Emergency Services evaluated any potential impact on the existing evacuation routes. All of these factors together demonstrate qualitatively that the project will have a less than significant impact on evacuations and, consistent with the Attorney General Guidance, a quantitative modeling analysis is not necessary to support this conclusion. Moreover, "CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396. "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (Guidelines, § 15204, subd. (a).)

G-104 The comment requests more specific details on the legal status and guaranteed long-term maintenance of emergency access points, particularly the one connecting to the business park.

The emergency access points identified in the Draft EIR and FSP will be fully accessible to emergency services. Some of the proposed roadways will be public roadways and others are proposed to be private with gates. All gated access points are required to be approved by the El Dorado Hills Fire Department as part of the improvement plan review for the project to ensure all points of access are functional and accessible to law enforcement and emergency services. The FSP (p.60, Section 7.3 (j) - Fire Protection Plan Mitigation Strategies) states: "A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6. Reliable on-going sources of funding shall be established acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project." The HOA or other established entity will be required to comply with the FSP for the life of the project, including maintenance of the EVA to the Business Park.

G-105 The comment requests that the final project documents include a legal mechanism to ensure continued enforcement of the FSP requirements even if the HOA fails to do so.

The FSP states that the HOA or other acceptable entity shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP, and that reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project (p.60, Section 7.3 (j) -Fire Protection Plan Mitigation Strategies).

G-106 The comment expresses support for the requirement of a fire-resistant plant palette (WF-4) and requests that the County include a clear list of prohibited and recommended plants in its final approval. As stated in mitigation measure WF-4, a landscape plan would be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The mitigation measure would also be included as a note on any Final Map, grading plans, and construction plans. The plant

palette would not include any trees or vegetation identified by the El Dorado Hills Fire Department on its list of Highly Flammable Trees & Vegetation.

G-107 "The comment agrees with the Draft EIR's identification of post-fire hazard risks such as erosion and flooding but suggests that the project should be designed to be more resilient from the outset. The comment recommends that final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist.

As stated in the Draft EIR, the project's drainage system is designed consistent with the County's hydromodification standards and post-development stormwater runoff would not exceed pre-development runoff rates to ensure flooding would not occur downstream of the project (p. 3.15-35). The Geotechnical Study prepared for the project (included as Appendix D to the Draft EIR) also concludes that the potential for slope instability to occur is negligible. Based on current conditions, the project would not exposure future residents or structures to hazards associate with post-fire runoff, flooding, or erosion. The post-fire field assessment in mitigation measure WF-6 is only required if there is an on-site wildfire during project build-out, which could change the conditions of the site in areas not yet developed. The effects of potential wildfires on the site cannot be predicted at this time and a post-fire assessment would identify any areas of increased risk and include recommendations to mitigate any new post-fire risks."

G-108 "The comment finds the wildfire analysis in the Draft EIR to be thorough and transparent, and supports the proposed mitigation measures. However, the comment calls for stronger commitment regarding evacuation planning, long-term maintenance, and post-fire hazard management. The comment advocates for the RIA as the most responsible and sustainable development option due to its significantly lower population in a high-fire-hazard area.

The Draft EIR addresses evacuation, vegetation maintenance, and post-fire hazards in Section 3.15, Wildfire, and includes mitigation measures WF-1 through WF-6 to ensure that the project's wildfire risks are minimized. The comment does not specify any inadequacies in the environmental analysis. The comment's support for the RIA is noted and no further response is required.

G-109 The comment agrees with the Draft EIR's identification of significant and unavoidable impacts, particularly to aesthetics and tribal cultural resources, and views this as a transparent acknowledgment of the project's environmental consequences. The comment emphasizes that the RIA with its lower density and greater cultural resource preservation, is the more responsible approach for development. The comment is noted and no further response is required.

G-110 The comment acknowledges the irreversible conversion of undeveloped land to urban uses and permanent consumption of natural resources from the project, and while the RIA would also result in these irreversible impacts, the comment suggests that the RIA is the more sustainable choice for development. The Draft EIR identifies the RIA as the environmentally superior alternative (p. 5-34), consistent with the comment. The comment is noted and no further response is required.

G-111 The comment agrees with the Draft EIR's conclusion that the project would not result in significant growth inducement. The comment is noted and no further response is required.

G-112 The comment supports approval of the RIA because it is the more environmentally sensitive approach and would address impacts to aesthetics and tribal cultural resources. The comment is noted and no further response is required.

G-113 The comment reiterates the Draft EIR's conclusion that the RIA would avoid significant and unavoidable impacts related to air quality and tribal cultural resources, and that the RIA would be the environmentally superior alternative. The comment is noted and no further response is required.

G-114 The comment acknowledges the Draft EIR's conclusion that the No Project/No Development Alternative would avoid all environmental impacts but would also not achieve any of the project objectives. The comment is noted and no further response is required.

G-115 The comment agrees with the Draft EIR's analysis of the Zoning Consistent Alternative. The comment is noted and no further response is required.

G-116 The comment supports the Draft EIR's analysis of the RIA and the conclusion that the RIA is the environmentally superior alternative due to its preservation of tribal cultural resources and reduction of operational air pollutant emissions below significance thresholds. The comment is noted and no further response is required.

G-117 The comment agrees with the Draft EIR's finding of a significant and unavoidable impact on aesthetics from the RIA, but notes that the RIA would preserve more open space and lower density which would minimize the impact compared to the proposed project. The Draft EIR acknowledges that the RIA may preserve some of the existing undeveloped land aesthetic (p. 5-20). However, the Draft EIR ultimately concludes that because the RIA land use plan is comparable to the proposed project, with similar types of development proposed in the same general areas throughout the project site, the RIA would result in similar visual impacts as the proposed project. The comment is noted and no further response is required.

G-118 The comment supports approval of the RIA and cites the findings in the Alternatives section of the Draft EIR. The comment is noted and no further response is required.

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Comment Letter H

From: Christine .
To: creeksidevillagesp@edcgov.us
Subject: Attn Cameron Welch- public comment
Date: Thursday, July 10, 2025 6:58:41 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Mr. Welch - I am a ten-year resident of the Blackstone Development and frequently enter my residence off Latrobe and Royal Oaks Drive. I am not opposed to growth and development if it's done appropriately and accommodates the needs of the community. As you know, Latrobe Rd is frequently traveled and at high rates of speed. This road is already an issue during peak traffic times and the development of 763-918 residential units would heavily impact this road. This is a safety issue not only for the high rate of speed traveled, but more importantly, because it is the only way in and out of the area. Adding more structures increases the risk of fire, or during a natural disaster, the probability of escape has greatly been reduced. The DOT needs to modify Latrobe, and the lanes need to be increased. There is no way around this. As a former member of the traffic and safety committee, this will be one of the most significant roadblocks in addition to the resistance of growth. H-1 H-2

Blackstone is a community full of young families and children. There are several school bus routes that travel in and out of Latrobe throughout the day and as a mother of 3 attending 3 different schools I do know this will affect the bus routes and this will have a huge impact whether or not it's 55+. Please consider the traffic first and foremost. H-3

Respectfully submitted,
Christine Morris

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Response to Comment Letter H

Christine Morris

H-1 The commenter notes she is a resident of the neighboring Blackstone Development and uses the Latrobe and Royal Oaks Drive intersection. The commenter is concerned that adding more vehicle trips to Latrobe Road would contribute to vehicles traveling at unsafe speeds and create a safety issue. This is a concern because Latrobe Road is the only access for residents living in the Blackstone Development.

The increase in vehicle trips associated with the Creekside Village Specific Plan was evaluated in Section 3.12, Transportation in the Draft EIR. At full buildout of the project (assuming development of 918 residential units and approximately 5,400 square feet of neighborhood commercial uses [i.e., coffee, restaurant]) the project is estimated to generate 8,484 residential trips and 1,556 commercial trips (Draft EIR, Table 3.12-1, p. 3.12-15). This is considered the most conservative or worst case. Under the Active Adult option there would be 150 conventional homes and 768 active adult units. This would reduce the number of residential trips to 6,186 since age-restricted units generate fewer trips than traditional households (Draft EIR, p. 3.12-16). As part of the EIR alternatives to the project were evaluated that would reduce or avoid impacts to sensitive resources. Through this process the Reduced Impact Alternative (RIA) was developed with input from the United Auburn Indian Community, the project applicant, Latrobe School District and County staff. The RIA reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA would generate approximately 4,147 new daily vehicle trips, compared to 10,040 new trips under the proposed project or 6,186 new trips with the Active Adult Option (Draft EIR, p. 5-29). County staff has indicated support of the RIA in lieu of the proposed project. The RIA would reduce the number of vehicle trips and, the same as the project, would be consistent with the County's General Plan level of service policies TC-Xd and TC-Xe (Draft EIR Appendix H, Transportation Impact Study).

The project's primary access would be from Latrobe Road via an extension of Royal Oaks Drive. Currently this intersection is controlled by a stop sign but a new traffic signal at this intersection is proposed. No safety hazards associated with the project were identified. In addition, the number of accidents along Latrobe Road was reviewed and based on five years of data, from 2018 to 2023, five accidents were reported near the project site along Latrobe Road between Larkstone Place and Wetsel-Oviatt Road which included vehicles but no pedestrians or bicyclists. The accidents caused non-fatal injuries due to head-on, sideswipe, or broadside collisions due to unsafe speeds and maneuvers (Draft EIR, p. 3.12-8). As noted by the commenter, vehicles not obeying the current speed limit along Latrobe Road is an existing condition and not attributed to the project. While an existing condition, the addition of a new signal at Latrobe and Royal Oaks Drive will likely reduce speeds at that location. The Draft EIR adequately evaluates and addresses the increase in vehicle trips on local roadways and concerns associated with safety.

H-2 The comment raises a concern that adding more structures increases the risk of fire and adequate emergency access. The comment also notes a desire that Latrobe Road be expanded to enable future development.

The Draft EIR evaluates the project's risk of wildlife in Section 3.15, Wildfire. The project site is located within a wildland urban interface area, which is identified as a zone of transition between wildland

(undeveloped/unoccupied/"natural" land) and urban development (Draft EIR, p. 3.15-26). The project site has been identified as a Moderate Fire Hazard Severity Zone, with a small area located in the southeast portion of the site designated as a High Fire Hazard Severity Zone. The project site is located approximately 1.5 miles southeast of Station 87 and emergency response would be anticipated to be approximately between 1 to 3.2 minutes, which is within the response time goal for Station 87 and the minimum level of service set by the County (Draft EIR, p. 3.15-9).

A Fire Safe Plan was prepared for the project and approved by the El Dorado Hills Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE) to mitigate the wildfire risk (Draft EIR Appendix J, Fire Safe Plan). As noted in the Draft EIR, existing potential ignition sources near the project site include surrounding roadways and vehicles, overhead transmission lines, off-site commercial areas, off-site residential neighborhoods, and other arson-related ignitions. Construction and operation of the project would introduce new potential sources of ignition to the project site, including increased human activity and additional vehicles traveling on internal and external roads (Draft EIR, p. 3.15-26). The Fire Safe Plan reviewed the proposed uses, conditions on the project site, and local conditions and determined the project site has a low wildfire risk (Draft EIR, p. 3.15-26). However, construction equipment could spark a fire and during operation, even with adherence to all the required federal, state and local fire safety requirements there is no guarantee that compliance with these standards would prevent damage or destruction of structures by fire in all cases. Therefore, impacts due to wildfire are considered potentially significant and require mitigation. Mitigation would include preparing a Construction Fire Prevention Plan prior to any site-disturbing activities; implementation of measures included in the Fire Safe Plan; and adherence to a fire-resistant plant palette for the landscaping plan. Compliance with these measures would reduce impacts to less than significant (Draft EIR, pp. 3.15-31-3.15-33).

The project includes four access points: Latrobe Road/Royal Oaks Drive intersection, a new road between Royal Oaks Drive and Avanti Drive, and Latrobe Road at Wetsel-Oviatt Road. The fourth project access would connect to the El Dorado Hills Business Park located along the northwestern project boundary via a non-vehicular access road to be used as a pedestrian/bicycle crossing. This fourth access could be used as emergency access, if needed. A fifth emergency access would also be available to the east through the connection of Royal Oaks Drive to Heritage at Carson Creek that would provide access during emergencies to Carson Crossing Drive and ultimately White Rock Road. In the event of an emergency project residents would have numerous accessways to exit the area. The project is also located within the County's Emergency Operations Plan which provides protocol in the event of an emergency evacuation. The County does not publicly distribute established evacuation routes or its community evacuation plans, and the appropriate evacuation routes would be indicated on a case-by-case basis in the event of a wildfire emergency depending on the location, current conditions, and other factors (Draft EIR, p. 3.15-24). The Draft EIR adequately evaluates and addresses concerns associated with wildfire and emergency access.

H-3 The comment offers an opinion that the project will affect the bus routes and requests traffic be considered.

It is not clear from the comment how the project would affect school bus routes. The Latrobe School District and the El Dorado Unified High School District provide bus service to students. The project is not proposing to relocate or change existing bus stops or to affect existing bus routes. The Draft EIR includes a thorough evaluation of traffic in Section 3.12, Transportation and in the Transportation Impact Study (included as Appendix H to the Draft EIR).

Appendix A
Comment Letters

Docusign Envelope ID: 1D36D669-7EE5-4A99-BC6C-990B8B95A4D1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 19, 2025

Cameron Welch, Senior Planner
El Dorado County
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

Subject: Creekside Village Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH No. 2020110052

Dear Cameron Welch,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from El Dorado County for the Creekside Village Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park within an unincorporated area of El Dorado County in the community of El Dorado Hills.

The Project proposes to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist El Dorado County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project. A-1

COMMENT 1: Incidental Take Permit for CESA or NPPA listed Species

Issue: The DEIR identified species that are state-listed as rare, candidate, threatened, or endangered under CESA or NPPA within the project area. CFDW is particularly concerned with project impacts to Boggs Lake hedge-hyssop (*Gratiola heterosepala*), tricolored blackbird (*Agelaius tricolor*), and burrowing owl (*Athene cunicularia*). The DEIR fails to fully analyze impacts to tricolored blackbird (*Agelaius tricolor*) nesting habitat for the life of the project or include sufficient measures to reduce impacts to a less than significant level. The DEIR also fails to fully analyze the potential take of state listed Endangered Boggs Lake hedge-hyssop (*Gratiola heterosepala*) or include sufficient measures for no net loss of the species or its habitat. Therefore, impacts are not reduced to a less than significant level. A-2

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Recommendation: CDFW recommends a qualified biologist complete individual biological assessments for all project areas covered under this DEIR. An ITP should be obtained where the Project has the potential to result in take of a species state-listed as rare, candidate, threatened, or endangered under CESA or NPPA, either through construction or over the life of the Project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).). Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, CDFW recommends the PEIR include species specific measures to minimize and fully mitigate the impacts to any state-listed species the Project activities have the potential to take. A-3

COMMENT 2: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: Boggs Lake hedge-hyssop is an annual herb that is State listed as Endangered. Per the DEIR, this species has a moderate potential to occur on the project site based on site and soil conditions. CESA and the Native Plant Protection Act (NPPA) prohibit the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. The DEIR fails to address take of the species and its habitat or analyzing project impacts to habitat fragmentation including increased human activity after project completion. The DEIR should include sufficient measures to reduce impacts to a less than significant level. A-4

Recommendation: CDFW recommends using the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018; Attachment 1), to conduct a minimum of two focused special-status plant surveys prior to construction during the blooming season for special-status plant species that may occur on the project site. Surveys should be spaced a minimum of three (3) weeks apart during the blooming period. Exact survey timing should be determined by a qualified biologist with experience with the species being surveyed. If special-status plants are discovered during these surveys, coordination with CDFW to develop a plan for avoiding project impacts to special-status plants is recommended. The DEIR should cover a range of possibilities for mitigation. The use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species are generally experimental in nature and largely unsuccessful. Therefore, the DEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species. Take of state-listed plants due to Project activities may only be permitted under an appropriate CESA take authorization. Furthermore, please be aware that the County's in-lieu fee program may not meet the full mitigation standard under CESA. A-5

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COMMENT 3: Section 3.3 Biological Resources; Boggs Lake hedge-hyssop (*Gratiola heterosepala*); Pages 3.3-12, 3.3-23, and 3.3-39

Issue: On page 3.3-23, Policy 7.4.2.8 it states, "*Conserve contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the County through a Biological Resource Mitigation Program*." Fragmentation of special status plants can lead to genetic bottlenecking and a loss of genetic diversity. Conserving contiguous blocks of habitat is important to ensure long term species success. The DEIR fails to analyze the cumulative and continued habitat fragmentation of rare plant species habitat.

A-6

Recommendation: CDFW recommends the DEIR analyze continued habitat fragmentation on rare plant species habitat within this Project area. The DEIR should describe avoidance, minimization and mitigation measures to reduce the project's contribution to habitat fragmentation.

COMMENT 4: Section 3.3 Biological Resources; 3.3.1 Impacts to Tricolored Blackbird; page 3.3-28

Issue: Project grading would result in the removal of approximately 0.10-acres of Valley Foothill riparian (e.g., blackberry thicket associated with riparian wetland) that is suitable tricolored blackbird nesting habitat. Indirect human disturbances and noise from construction activities have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Human occupation of the portion of the project site nearest to the nesting colony location after construction is complete could result in disturbance of future nesting colony activities, potentially causing tricolored blackbirds to discontinue use of this nesting habitat.

As stated in the DEIR, only twelve colony locations are known to exist within El Dorado County. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. The project area has known nesting habitat with a recorded tricolored blackbird nesting colony at the project site in 2022, 2023, and 2024. The tricolored blackbird colony was an active breeding colony in 2022 and 2024. The removal of 0.10 acres of Valley Foothill riparian (e.g., blackberry thicket) coupled with the indirect and direct impacts human disturbances and noise from construction have the potential to cause colony abandonment and death of young or loss of reproductive success during nesting season. Take of state-listed species due to Project activities may only be permitted under an appropriate CESA take authorization and is a significant impact.

A-7

Recommendation: CDFW recommends the project avoid suitable habitat onsite, such as the blackberry thicket, to decrease the potential for colony abandonment. Cumulative projects in the vicinity have removed suitable foraging habitat and induced abandonment of colonies such as the one within the Carson Creek Specific Plan Area to the west of the project area. CDFW recommends the El Dorado County include measures to further avoid

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indirect and direct impacts through fragmentation and habitat removal including but not limited to permanent fencing (with an appropriate buffer), preserved habitat areas, and habitat corridors. A-7 Cont.

COMMENT 5: Section 3.3 Biological Resources; BIO-5 Tricolored Blackbird; page 3.3-32 and 3.3-33

Issue: Mitigation Measure BIO-5 is not adequate in reducing impacts to tricolored blackbird to a less-than significant level. Construction activities near suitable tricolored blackbird nesting habitat could result in significant impacts to nesting tricolored blackbird through loss of foraging habitat, noise, fugitive dust, human presence, and/or night lighting. Noise from road use, generators, and other equipment may disrupt tricolored blackbird mating calls or songs which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Bayne et al. (2008) found that songbird abundance and density was significantly reduced in areas with high levels of noise. As a result, the nesting bird mitigation measure included in the DEIR does not reduce impacts to tricolored blackbird to less than significant. A-8

Recommendation: CDFW recommends implementing the following Tricolored Blackbird preconstruction survey measure prior to initiation of construction activities:

Tricolored Blackbird Nesting Survey. Prior to initiation of construction in the project work area and within a ¼-mile of the project work area, a qualified biologist shall conduct protocol-level surveys to evaluate the presence of tricolored blackbird breeding colonies, suitable nesting and foraging habitat. Surveys shall be conducted during the nesting season (March 15 to July 31). If construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. If breeding colonies are found, the foraging behavior of the colony shall also be documented. Many tricolored blackbird breeding colonies expand over time as additional birds are recruited at the edges of established colonies. For this reason, it is important to reassess the extent of a breeding colony before the start of construction activities. If tricolored blackbirds are found, no work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated. A-9

COMMENT 6: Section 3.3 Biological Resources; BIO-7 Burrowing Owl Avoidance; page 3.3-33-3.3-34

Issue: Mitigation Measure BIO-7, Burrowing Owl Avoidance, fails to acknowledge that burrowing owl is currently a candidate for listing under CESA. Mitigation Measure BIO-7 currently states "*If this is infeasible, the project applicant shall consult with CDFW to obtain an Incidental Take Pemit (if necessary based on species listing decision) and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced.*" A-10

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Recommendation: CDFW recommends the DEIR reflect burrowing owl candidate status and change Mitigation Measure BIO-7 to "*If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant should consult with CDFW to obtain an Incidental Take Pemit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced if it is still a candidate or has become CESA listed*." A-10 Cont.

COMMENT 7: Section 1602 of the Fish and Game Code; BIO-9 Wetland Compensatory Mitigation; page 3.3-36

Issue: The DEIR has identified 7 acres of perennial, intermittent, and ephemeral rivers, and other hydrologically connected aquatic features both on and offsite. These identified Project activities will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Impact 3.3-2 does not fully analyze the removal of vegetation within riparian areas and fails to address Section 1602 of the California Fish and Game Code within Mitigation Measure BIO-9. The DEIR should include measures to reduce impacts to aquatic features including obtaining a Streambed Alteration Agreement to bring project impacts a less than significant level. A-11

Recommendation: The DEIR should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less than significant level including but not limited to Project impacts to water temperature, water nutrient concentrations, and turbidity. A-12

The DEIR has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently proposed in the DEIR will require a LSA Agreement. A LSA Agreement will include measures necessary to protect existing fish and wildlife resources. A-13

CDFW's issuance of a LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, the DEIR should

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fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

A-13 Cont.

COMMENT 8: 3.3 Biological Resources; BIO-10 Stream Preservation with Park Design; Page 3.3-37

Issue: The DEIR states the final park design shall incorporate fencing, including but not limited to post and cable fencing, around the buffer area to prevent public entry into the channel and buffer. Certain fence designs can inadvertently trap wildlife and would be considered a significant impact unless sufficient avoidance and minimization measures are incorporated into the DEIR.

Recommendation: CDFW recommends the DEIR consider capping all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any of u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the Project to prevent the entrapment of wildlife, especially birds of prey. When animals collide or tangle in fences they can be injured or killed. By tailoring fence design and placement, you can prevent wildlife injuries. CDFW recommends using “A Landowner’s Guide to Fences and Wildlife” (2012, Attachment 2) to construct and modify your fencing and crossings to be friendlier to wildlife while still meeting fencing needs. A Biologist should check fence posts, signs, or vertical poles for this requirement at the completion of the Project.

A-14

COMMENT 9: 3.3 Biological Resources; BIO-3 Work Area Delineation and Fencing; page 3.3-31

Issue: Mitigation Measure BIO-3 states "*The exact location of the fencing shall be determined by the resident construction contractor coordinating with a qualified biologist*." A qualified biologist should be consulted and onsite during all fencing activities before the start of construction and grading. Buffers should not be determined by construction contractors.

Recommendation: Before any site clearing, grading or other ground disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. A qualified biologist experienced with the native flora and fauna of the project site should oversee establishing buffers for species on site.

CDFW recommends the following sentence be changed “*The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor."* The fencing should also be checked regularly and maintained by a qualified biologist until all construction is complete.

A-15

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COMMENT 10: 3.3 Biological Resources; BIO-2 Environmental Awareness Training; page 3.3-30

Issue: Mitigation Measure BIO-2 fails to acknowledge multiple construction years and between construction years new personnel may be added to the project as well prolonged times between construction years.

Recommendation: Construction personnel should have refresher and introductory Environmental Awareness Training as needed and appropriate. CDFW recommends that BIO-2 be changed to read as the following:

A-16

"*Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work."*

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

A-17

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CDFW appreciates the opportunity to comment on the DEIR for the Creekside Village Specific Plan to assist El Dorado County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswalt, Environmental Scientist at (916) 358-4315 or caitlyn.oswalt@wildlife.ca.gov.

A-18

Sincerely,

DocuSigned by:
Morgan Kilgour
C3A86764C0AD4F6...

Morgan Kilgour
Regional Manager

Attachments

1. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

2. Paige, C. 2012. A Landowner's Guide to Fences and Wildlife: Practical Tips to Make Your Fences Wildlife Friendly. Wyoming Land Trust, Pinedale, WY. 52 pp.

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)
Caitlyn Oswalt, Environmental Scientist
Department of Fish and Wildlife

Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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REFERENCES

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 3/2018)

Patricelli, G. L., and J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment.

Halfwerk, W., L. J. M. Holleman, C. M. Lessels, and H. Slabbekoorn. 2011. Negative impact of traffic noise on avian reproductive success. Journal of Applied Ecology

Bayne, E. M., L. Habib, and S. Boutin. 2008. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. Conservation Biology

California Water Boards

Gavin Newsom
Governor

Yana Garcia
Secretary for
Environmental Protection

Central Valley Regional Water Quality Control Board

19 August 2025

Cameron Welch
County of El Dorado
2850 Fairlane Court
Placerville, CA 95667
cameron.welch@edcgov.us

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CREEKSIDE VILLAGE SPECIFIC PLAN, SCH#2020110052, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 20 June 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Creekside Village Specific Plan, 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.

B-1

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.

B-1 Cont.

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

B-1 Cont.

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 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

[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.

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

B-1 Cont.

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

B-1 Cont.

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) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

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

Tony Gon
Winn Communities
Tony@winncommunities.com

Angelica Chiu
Dudek
achiu@dudek.com

From: Amy A. Phillips
To: Cameron W. Welch
Cc: Justin M. Ward
Subject: Fw: NOA for the Creekside Village Specific project DEIR
Date: Friday, June 20, 2025 12:00:01 PM
Attachments: NOA CVSP 6-20-2025.pdf

Hi Cameron,

Although the EIR does address County water quality comments, I do have one edit to page 3.8-21 in **red** below:

Post-construction, the project would be designed to include a water quality bioswale, detention basins, and a hydromodification5 pond (e.g., retention/detention basin) at the western corner of the site. These features would be sized to retain and treat on-site stormwater generated **by the 85th percentile 24-hour and the 2-year 24-hour storm events** in accordance with the Post-Construction Program guidelines.

C-1

Thank you,

Amy A. Phillips, CPSWQ, CPESC, QSD
Stormwater Coordinator - West Slope

County of El Dorado
Tahoe Planning & Building Division
2850 Fairlane Court, Placerville, CA 95667
(530) 621-5921
amy.phillips@edcgov.us

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 20, 2025 8:21 AM
Subject: NOA for the Creekside Village Specific project DEIR

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed

at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed."

Comment Letter D

EL DORADO HILLS
COMMUNITY SERVICES DISTRICT

August 19, 2025

El Dorado County Planning and Building Department
Attn: Cameron Welch
2850 Fairlane Court
Placerville, CA 95667
creeksidevillagesp@edcgov.us

RE: **Creekside Village Specific Plan Draft EIR**

Dear Mr. Welch,

The El Dorado Hills Community Services District ("District") appreciates this opportunity to participate and submit information to help inform the Creekside Village Specific Plan (CVSP) Draft EIR (DEIR) process. Below are the District's comments submitted to be addressed in the Final EIR.

PARKLAND DEDICATION & DEVELOPMENT STANDARDS (POLICY #6110)

All subdividers of land within the District's jurisdiction shall dedicate park land suitable for active recreation use, or pay fees in-lieu thereof, or by District Board authorization, follow a combination of these alternatives. Dedication amounts shall be determined as a result of calculation based on the legislated rate of 5 acres per 1000 population project yield. Population per dwelling unit is specified in the County Subdivision Ordinance and is calculated at the rate of 3.3 persons for single family subdivisions and 2.1 for multi-family subdivisions on a per parcel basis (Pol. 6110.10). D-1

The DEIR identifies up to 918 single family units or 763 single family units in the "Reduced Impact Alternative" which would yield 3,029 and 2,518 future residents respectively based on the County ordinance population yield of 3.3 persons per household in El Dorado Hills. The CVSP identifies a total of 11.94 acres of village and neighborhood parks, and potentially up to 15.4 acres. The identified acres of parkland could meet the District's needs and requirements for parkland dedication. However, Board of Directors' approval is required for any parkland dedication agreement. D-2

DRAFT EIR CHAPTER COMMENTS

Chapter 3 Environmental Analysis

Impact 3.11-3

- The narrative identifies parkland dedication requirements if the development were to happen in El Dorado County outside the District boundary. However, a Specific Plan proposed within the District's Sphere of Influence (SOI) may be conditioned to annex into the District's boundary. The DEIR narrative in this section should contemplate the difference in parkland dedication required within the District boundary. D-3

Chapter 3.14 Utilities and Service Systems

- The District is the primary provider of Recycling & Solid Waste Collection and Communications (Cable TV). The DEIR narrative in this section should contemplate the District as the administrator of these utilities and services if within the District boundary.

D-4

OTHER DISTRICT SERVICES

The District is also the primary provider of Covenants, Conditions, & Restrictions (CC&Rs), and Design Review/Architectural Control services. Should the CVSP require CC&R and/or Design Review services, the applicant shall work with the District.

D-5

The District looks forward to the future park and recreation facilities as part of the CVSP. Should you have any questions or comments regarding the concerns expressed in this letter, please contact me at (916) 614-3214 or jkernen@edhcsd.org

Best regards,

Jeff Kernen

Jeff Kernen
Principal Planner
El Dorado Hills Community Services District

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

July 1, 2025

County of El Dorado
Planning and Building Dept.
2850 Fairlane Court
Placerville, CA 95667

Ref: Gas and Electric Transmission and Distribution

Dear El Dorado County Planning,

Thank you for submitting the **Creekside Village Specific** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

E-1

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

E-2

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

E-3

Sincerely,

Plan Review Team
Land Management

Pacific Gas and Electric Company

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Pacific Gas and Electric Company

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

From: PGE Plan Review
To: CreeksideVillageSP
Subject: RE: Creekside Village Specific Project DEIR
Date: Tuesday, July 1, 2025 10:49:09 AM
Attachments: image001.png
Initial_Response_Letter_[07012025].pdf

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Classification: Internal

Dear El Dorado County Planning,

Thank you for submitting **Creekside Village Specific** project plans. The PG&E Plan Review Team is currently reviewing the information provided. If the project has the potential to interfere with PG&E's facilities, we will provide project-specific comments in response.

Attached, you will find general guidelines regarding work near PG&E facilities and land rights. Please ensure compliance with these requirements when conducting work in proximity to PG&E's infrastructure.

Please note that this email and its attachment do not constitute PG&E's consent to utilize any portion of PG&E's land rights for purposes not previously granted. If there are any modifications to your design, we kindly request that you resubmit the revised plans to the email address listed below to ensure accurate review and assessment.

F-1

Should you have any questions regarding our review process or require further clarification, please do not hesitate to contact the PG&E Plan Review Team at **pgeplanreview@pge.com**.

Thank you for your cooperation. We appreciate the opportunity to assist.

Best regards,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: CreeksideVillageSP <creeksidevillagesp@edcgov.us>
Sent: Friday, June 27, 2025 11:00 AM
Subject: Creekside Village Specific Project DEIR

CAUTION: EXTERNAL SENDER!

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

To all Concerned Agencies and Interested Parties:

The County of El Dorado Planning and Building Department – Planning Division (County), as the Lead Agency, prepared a Draft Environmental Impact Report (DEIR) for the proposed Creekside Village Specific Plan (CVSP or project). The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 2100 et seq. and the CEQA Guidelines (14 California Code of Regulations [CCR] Sections 1500 et seq).

PROJECT DESCRIPTION: The CVSP, or proposed project, consists of a Specific Plan application with the County to develop approximately 208 acres of land with a mix of residential, parks, neighborhood commercial, and open space land uses in the community of El Dorado Hills. The project site is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park (see project location figure). The CVSP provides for the development of up to 918 dwelling units (with an age-restricted 55+ "Active Adult" option), 1.8 acres of neighborhood commercial, 13.6 acres of parks, and 44.8 acres of open space. There would also be an option for converting the 1.8 acres of neighborhood commercial to park uses if neighborhood commercial is not adopted as part of the Specific Plan. The CVSP would include a coordinated circulation system that provides for efficient vehicular travel, bikeways, pedestrian pathways, and sufficient space for emergency access and evacuation. Off-site infrastructure improvements would also be required to implement the CVSP including connection to dry utilities, off-site water connections, construction of a new force sewer main, and off-site roadway improvements.

REDUCED IMPACT ALTERNATIVE: Preparation of an EIR requires the lead agency, in this case the County, to consult with local Native American Tribes (Tribes) that are traditionally and culturally affiliated with the project area regarding the presence of tribal cultural resources (TCRs). Through the consultation process with local Tribes, it was revealed that TCRs exist within the site and would be impacted by the project and could not be avoided. In addition, the

Latrobe School District indicated during preparation of the DEIR that its existing schools could not absorb the increase in students generated by the project and requested a reduction in the number of conventional housing units. To address potential significant impacts, an EIR is required to evaluate an alternative that would avoid or lessen environmental impacts while still meeting most of the objectives of the project. In collaboration with the Tribes and Latrobe School District, a new land use plan, the Reduced Impact Alternative (RIA), was developed which avoids impacts to TCRs and reduces the total number of residential units from 918 to 763, including limiting the number of conventional housing units to a maximum of 150 with the remainder restricted to Active Adult. The RIA proposes a 7.5-acre Village Park with 1.6 acres of the park containing a Planned Development (PD) overlay designation that could allow for neighborhood commercial uses to serve the plan area, similar to the proposed project. These potential commercial uses would require approval of a separate Conditional Use Permit and Planned Development. There would be two additional Neighborhood Parks, 4.4 and 2.2 acres in size, for a total of 14.1 acres in parks and 44.4 acres in open space. Given the ability to address significant impacts to TCRs and the concerns of the Latrobe School District, it was decided that the RIA should be analyzed at a project-specific level so that the County could ultimately approve the RIA instead of the proposed project.

This DEIR therefore evaluates the land use plan that was originally submitted by the applicant as the proposed project and also analyzes the RIA at the project-specific level, either of which could be approved by the County. Based on analysis completed at this time, County staff intends to recommend the RIA for approval because it avoids impacts to TCRs, reduces additional environmental impacts, and is the land use plan preferred by both the Tribes and the Latrobe School District.

PROJECT LOCATION: The property, identified by Assessor's Parcel Numbers 117-010-032 and 117-720-012, is located on the west side of Latrobe Road, south of Investment Boulevard, directly adjacent to the southern boundary of the El Dorado Hills Business Park, approximately 3 miles south of I.S. Highway 50, in the El Dorado Hills area, Supervisorial District 2.

PROVIDING COMMENTS: All written public and agency comments on the DEIR must be received by 5:00 PM on August 19, 2025, and should be directed to: County of El Dorado Planning and Building Department – Planning Division, Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667. Please include the name of the contact person of your agency, if applicable. Comments may be submitted via email to creeksidevillagesp@edcgov.us. Comments submitted via email must either be included in the body text of the message or as an attachment in Microsoft® Word or Adobe® PDF format. Comments may also be delivered in person to the Planning and Building Department at the address listed.

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El Dorado Hills Area Planning Advisory Committee https://edhapac.org

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Monday August 18, 2025
El Dorado County Planning & Building Department
2850 Fairlane Court, Placerville, CA 95667
ATTN: Cameron Welch

RE: Creekside Village Specific Plan DRAFT Environmental Impact Report
GPA20-0001, Z20-0005, SP20-0001, TM20-0002

The El Dorado HIlls Area Planning Advisory Committee (EDH APAC) would like to offer the following public comments on the Creekside Village Specific Plan DRAFT Environmental Impact Report.

EDH APAC has experienced a tremendous amount of engagement and outreach from the project applicant, beginning as far back as 2018. In the past several years this has also included numerous meetings, discussions, and communications with EDH APAC officers, our Standing Transportation and Environmental Committees, and several public discussions at EDH APAC meetings attended by community members.

EDH APAC would request that as the project moves forward towards entitlements and approvals, that any Conditions of Approval be required to have identified and enforceable timelines, and oversight management in place.

In these DEIR Comments below, "EDH APAC" refers to our Creekside Village Specific Plan subcommittee volunteers.

General Comments

- EDH APAC would like to acknowledge the positive relationship with the applicant.
- EDH APAC finds **preference for Alternative 3: Reduced Impact Alternative** and its alignment with the community's goals for a less dense, less impactful development.
- EDH APAC commends the applicant for the inclusion of a significant amount of open space and parks, which is a positive feature of the plan.

G-1

Specific Concerns and Clarifications

1. Density and Unit Count

- **Concern:** The Executive Summary mentions "up to 918 dwelling units," but it's not clear how this number aligns with Alternative 3, which is the preferred option. The provided text only describes the overall project and not the alternative.
- **Comment:** The committee supports the less dense Alternative 3 but notes that the Executive Summary focuses on the maximum 918-unit count. We recommend that the Executive Summary be revised to clearly state the preferred alternative and its corresponding unit count to avoid confusion. For the purpose of the Draft EIR, the committee's comments are based on the assumption that the project will proceed with the reduced density and unit count of Alternative 3. G-2

2. Neighborhood Commercial vs. Park Uses

- **Concern:** The plan includes a 1.8-acre neighborhood commercial option that can be converted to a park. This is a significant point of flexibility but also a potential point of uncertainty.
- **Comment:** The option to convert the 1.8 acres of neighborhood commercial to park uses is a positive feature. EDH APAC would appreciate a more detailed explanation of the decision-making process for this conversion. What specific triggers or criteria would be used to determine if the commercial space is not needed, and what is the timeline for making that decision? We would prefer that this land be designated for park use from the beginning to ensure maximum open space. G-3

3. Active Adult Option

- **Concern:** The "Active Adult Option" allows for a significant change in the type of units (age-restricted vs. conventional) but doesn't change the total number of units or park acreage. This could have different impacts on services, traffic, and community demographics.
- **Comment:** The Active Adult Option introduces a different demographic with potentially different service and amenity needs. While the total number of units and park acreage remain the same, EDH APAC is interested in seeing a more in-depth analysis of the potential impacts of this option on local services, such as emergency services (e.g., medical calls) and traffic patterns. G-4

4. Open Space and Preservation

- **Concern:** The plan designates a significant amount of open space, but it also differentiates between "Open Space Preserve" and "Open Space Buffer," with different use restrictions.
- **Comment:** The commitment to 44.8 acres of open space is highly significant. However, the distinction between 'Open Space Preserve' and 'Open Space Buffer' with different use restrictions requires careful consideration. EDH APAC recommends a clear and enforceable plan for the long-term maintenance and management of both areas. We're particularly interested in knowing how the use of multi-use trails in the Open Space G-5

Buffer will be managed to protect sensitive natural features while allowing for passive recreation.

G-5 Cont.

5. Off-site Improvements

- **Concern:** The document mentions off-site infrastructure improvements but lacks specific details on which roadways will be improved and what the timeline and funding sources for these improvements are.
- **Comment:** The plan mentions off-site roadway improvements, but it lacks specific details. EDH APAC would like to see a more detailed list of the proposed off-site roadway improvements, including specific locations, scope of work, and a timeline for completion. Additionally, a clear explanation of the funding mechanisms and responsible parties for these improvements is necessary to ensure they are completed in a timely manner and do not create unforeseen burdens on the County or existing residents. Allowing offsite improvements to fall to the twenty-year horizon of the County's CIP program is essentially planning NOT to implement these off-site roadway improvements. The improvements should at least be created concurrently with the buildout of the project.

G-6

Summary of Recommendations

EDH APAC would suggest considering the preferred Alternative 3. With this said, we would also request additional clarity and detail on the following key areas:

- **Clarity on the chosen alternative** (Alternative 3) in the Executive Summary.
- **A defined process** for the 1.8-acre neighborhood commercial to park conversion.
- **An updated analysis of the specific impacts** of the Active Adult Option on local services and traffic.
- **A robust, long-term management plan** for the differentiated Open Space Preserve and Buffer areas.
- **Detailed information** on the scope, funding, and timeline for all necessary off-site infrastructure improvements.

G-7

General Observations

- The objectives are broad and largely aspirational, which is common for a project of this nature.
- The objectives emphasize positive aspects like walkability, connectivity, and open space, which aligns with EDH APAC's general support.
- A key theme is **flexibility**, which, while useful for the developer, can create uncertainty for the community and for environmental analysis.

Specific Concerns and Clarifications

1. Compatibility with Existing Communities (Objective 2)

- **Concern:** Objective 2 states the project will "allow for development of land uses more compatible with the surrounding residential communities." This is a key objective, but the **Draft EIR** doesn't provide a detailed analysis of this compatibility, particularly with respect to traffic, noise, and visual impacts on adjacent neighborhoods.
- **Comment:** EDH APAC supports the objective of creating a community compatible with its surroundings. To ensure this, we request a more specific analysis of how the project's proposed land uses and densities, particularly under the different alternatives, will be compatible with the adjacent communities to the east and west. This analysis should include detailed modeling of traffic and noise impacts on existing neighborhood streets.

G-8

2. Employment and Housing Balance (Objectives 3 & 4)

- **Concern:** Objectives 3 and 4 link the project to providing housing for local employees. While this is a valid goal, the **Draft EIR** does not provide specific data on the number of new residents that are expected to be employed within El Dorado Hills. This makes the objective difficult to evaluate.
- **Comment:** The objectives of providing housing for local employees and supporting local businesses are commendable. However, to evaluate the effectiveness of these objectives, EDH APAC would like to see a more detailed analysis of the expected employment-housing balance. Are there any studies or data that project the percentage of new residents who are likely to work in El Dorado Hills or El Dorado County? This information would help confirm that the project genuinely addresses this objective.

G-9

3. Flexibility and Student Generation (Objective 9)

- **Concern:** Objective 9 introduces flexibility, including the option for age-restricted housing to reduce student generation "if the elementary and middle school district lacks capacity." This places the burden of proof on the school district and introduces uncertainty into the project's impact.
- **Comment:** Objective 9's reference to age-restricted housing as a response to school district capacity issues is a significant point of flexibility. EDH APAC believes that the **responsibility to mitigate student impacts should not be contingent on the school district's capacity but should be a proactive measure** from the outset. We request a clearer commitment from the applicant to a plan that ensures adequate school capacity, in the event that the project were to impact student enrollment rates, whether through impact fees or a guaranteed development plan that addresses this issue regardless of future enrollment numbers. Relying on a 'potential' reduction in student generation is not a sufficient mitigation strategy.

G-10

4. Park and Open Space as a "Focal Point" (Objective 8)

- **Concern:** The objective of creating parks as a "focal point" is positive, but the **Draft EIR** doesn't provide specific details on the amenities planned for these parks. Without this information, it's impossible to know if they will truly serve as community focal points.
- **Comment:** EDH APAC fully supports Objective 8, which designates parks, open space, and trails as a focal point. To ensure this objective is met, EDH APAC requests that a more detailed, conceptual plan for the amenities, design, and programming of the proposed parks be provided. For example, what specific recreational uses (e.g., sports fields, playgrounds, community gardens) are planned? This information is crucial for evaluating whether the parks will be able to serve the needs of the community and truly act as a 'focal point.'

G-11

General Comments

- **Outreach:** EDH APAC appreciates that the applicant, particularly in the pursuit of the RIA, appears to address many of the community's initial concerns, demonstrating a willingness to engage with the community, and seeking constructive feedback.
- **Support for RIA:** Of the Project and the alternatives considered in this DEIR, EDH APAC supports **Alternative 3: Reduced Impact Alternative (RIA)** due to its lower density and reduced environmental impact.

G-12

Specific Concerns and Clarifications

1. Population and Housing

- **Concern:** While the RIA significantly reduces the total population compared to the proposed project, the calculation is based on a 40% reduction for age-restricted units. This is a crucial assumption. The "Areas of Controversy" section lists traffic and school capacity as key issues, and both are directly tied to population.
- **Comment:** EDH APAC acknowledges that the RIA's population of approximately 997 residents is a significant reduction from the proposed project. However, this calculation is based on an assumed 40% reduction for age-restricted units. We request clarification on the data or studies supporting this specific 40% reduction, as a different assumption could result in a higher population and greater impacts on traffic and schools, two of the stated areas of controversy.

G-13

2. Neighborhood Commercial and Parks

- **Concern:** The RIA removes the 1.8-acre neighborhood commercial land use but retains the *potential* for it through a "subsequent discretionary process." The land is initially designated as Village Park. This creates uncertainty and risks a future land use change that could negatively impact the community by taking away parkland. The RIA provides a negligible park increase (0.5 acres) with the commercial land removed.

- **Comment:** The RIA's decision to remove the neighborhood commercial designation and designate the land as a Village Park is appreciated. However, EDH APAC is concerned about the potential for future development of this parkland into a commercial use via a 'subsequent discretionary process.' We believe that to truly address community concerns and ensure the parkland is preserved, this area should be permanently designated as parkland. EDH APAC would like the EIR to explore the feasibility of a binding agreement or legal mechanism that would make this conversion difficult or impossible. G-14

3. Open Space and Habitat Preservation

- **Concern:** The RIA shifts the balance of open space, designating 4.4 more acres to the "Open Space Preserve" but 4.8 fewer acres to "Open Space Buffer." While the overall acreage is similar, this change in designation and use could be significant for passive recreation and habitat protection.
- **Comment:** EDH APAC supports the increased acreage designated as 'Open Space Preserve' under the RIA, as this enhances the protection of sensitive habitats. We request additional detail on the specific rationale and implications of the corresponding reduction in 'Open Space Buffer.' How will this change affect the planned multi-use trails and passive recreation opportunities for residents? We also want to confirm that a detailed and funded long-term management plan is in place to ensure the integrity of both the preserved and buffered open spaces is maintained. G-15

4. Circulation and Traffic

- **Concern:** Traffic on local roadways is listed as a major area of controversy. The RIA proposes only "minimal changes" to the circulation system, which includes upgrading a portion of Royal Oaks Drive to a Minor Collector Street. This could introduce more traffic onto a local street, potentially affecting the quality of life for existing residents. The removal of a local street at the southeast corner is also a change that requires a clear justification.
- **Comment:** Traffic on local roadways is a key area of controversy. The RIA's proposed change to designate a portion of Royal Oaks Drive as a Minor Collector Street is concerning, as it may increase traffic volume and speed on a local street. We request that the EIR provide a more detailed traffic analysis specifically modeling the impacts of this change on existing residents. Additionally, the rationale for the removal of the small local street at the southeast corner of the site should be clearly explained to ensure there are no negative impacts on internal or external circulation. G-16

3.0 Environmental Analysis

Overall Summary

Aesthetics 3.1

1. General Comments on Methodology and Findings

- EDH APAC recognizes the detailed nature of the aesthetics section, including its site-specific analysis, discussion of scenic viewpoints, and use of relevant regulations.
- The EIR concludes that development of the site will cause a **significant and unavoidable impact** on both scenic vistas (Impact 3.1-1) and the visual character of the area (Impact 3.1-2). EDH APAC agrees with this conclusion.
- EDH APAC initially finds support for **Alternative 3: Reduced Impact Alternative (RIA) -** this is based on the belief that this alternative would lessen these significant and unavoidable impacts due to its reduced density and population.

G-17

2. Specific Concerns and Clarifications on Scenic Vistas (Impact 3.1-1)

- **Impact of Noise Barriers:** The EIR acknowledges that noise barriers would "replace existing views of the broad foothills... with foreground views of new housing, potential commercial buildings, and other structures such as solid noise barriers."
- **Comment:** The EIR correctly identifies that solid noise barriers will have a significant visual impact from Latrobe Road. We suggest a more detailed visual simulation or rendering showing the specific height, location, and materials of these barriers from a motorist's perspective on Latrobe Road and from the public pathway would better inform the community. We also recommend that the project explore design options that would visually soften these barriers, such as incorporating landscaping or using materials that are more visually compatible with the surrounding environment. While the aesthetic aspects of the noise barriers is desired, effective mitigation achieved by the noise barriers should remain the primary focus.
- **Preservation of the Hilltop:** The EIR notes the preservation of the high point of the site (650 feet AMSL) as a public trail and viewpoint.
- **Comment:** The preservation of the hilltop at 650 feet AMSL and its integration into the public trail system is a positive feature. To ensure this remains a protected public viewpoint, we request that the legal status and long-term maintenance of this area be clarified. Will a conservation easement or similar mechanism be used to permanently protect this land from future development?

G-18

G-19

3. Concerns on Visual Character and Quality (Impact 3.1-2)

- **Impact of Urbanization:** The EIR correctly finds that the project will substantially degrade the visual character of the site from undeveloped grassland to suburban development.
- **Comment:** We agree that the project will fundamentally change the visual character of the site from undeveloped land to a suburban residential development. While this is a significant and unavoidable impact, the project's design can help mitigate this to a degree. We suggest the EIR provide more detailed information on how the development will be 'blended' into the natural landforms, including specific architectural design guidelines and color palettes that will be enforced by the HOA CC&Rs to ensure a cohesive and less visually jarring appearance from public viewpoints. G-20
- **Alternative 3's Role:** The EIR briefly mentions that the "Active Adult option" might have slightly reduced impacts due to single-story homes, but this is a very general statement. The RIA should be more explicitly addressed here.
- **Comment:** The EIR notes that the Active Adult option could have slightly reduced impacts due to single-story homes. We believe the full **Alternative 3 (RIA)**, with its lower overall density, would result in a less severe visual impact compared to the base project. We request the EIR provide a comparative visual analysis, perhaps with a series of renderings, that demonstrates how the reduced density and different housing mix of the RIA would visually differ from and potentially reduce the severity of the 'significant and unavoidable' impacts. G-21

4. Light and Glare (Impact 3.1-3)

- **Concern:** The EIR concludes that the impact from light and glare will be **less than significant** because the project will comply with existing standards. This is a common finding, but a plan for concrete implementation should be developed.
- **Comment:** The EIR's conclusion that light and glare impacts are 'less than significant' relies on compliance with existing County standards. To provide greater assurance, we request more specific detail on how these standards will be implemented. For example, will all streetlights be required to be 'full-cutoff' fixtures? Will there be specific restrictions on 'uplighting' or decorative lighting? These details, if included in the final plan, would provide more certainty to the community. G-22
- **Concern:** The EIR mentions that the project will be subject to the County’s Outdoor Lighting Standards.
- **Comment:** We ask that the EIR clarify which specific provisions of the County's Outdoor Lighting Standards will apply and how they will be enforced. Will this be a requirement in the HOA CC&Rs, or will it be a condition of project approval? G-23

5. Cumulative Impacts (Impacts 3.1-4, 3.1-5, and 3.1-6)

- The EIR finds that the project will have a **significant and unavoidable cumulative impact** on both scenic vistas and visual character.
- **Comment:** EDH APAC concurs with the EIR's conclusion that the project, along with other cumulative developments, will result in a significant and unavoidable impact on the area's scenic vistas and overall visual character. This finding further justifies our preference for **Alternative 3 (RIA)**, which, by its nature, would contribute less to this cumulative impact than the base project. We believe that acknowledging this significant cumulative impact makes the reduced scale of the RIA the most responsible path forward for the County.

G-24

Air Quality 3.2

General Observations

- The EIR correctly identifies that the project will have a **significant and unavoidable impact** on air quality due to the exceedance of the El Dorado County Air Quality Management District (EDCAQMD) significance threshold for Reactive Organic Gases (ROG) during operations.
- The EIR states that even with the less dense **Alternative 3 (RIA)**, the ROG exceedance would still occur. EDH APAC acknowledges this, however, while the RIA's lower overall emissions are a more responsible choice, if they still don't meet the threshold.

G-25

1. The Core Significant and Unavoidable Impact

- **Concern:** The EIR states that the project's operational emissions will exceed the EDCAQMD's significance threshold for ROG, leading to a "significant and unavoidable" impact. This is the most critical finding in this section.
- **Comment:** EDH APAC acknowledges and agrees with the EIR's conclusion that the project will result in a significant and unavoidable impact on air quality due to exceeding the EDCAQMD's ROG emissions threshold. We understand that mitigation measure AQ-2 is proposed to address this, but it's clear that it does not fully mitigate the impact. We support the finding that this is a significant and unavoidable impact, as this is a more transparent and accurate assessment of the project's air quality effects.
- **Clarification on Mitigation:** The EIR states that mitigation measure AQ-2, requiring zero-VOC paints, is all that is feasible. We would suggest a more detailed explanation of why additional mitigation measures, such as requiring all-electric home appliances from the outset, are not considered feasible and required to reduce this impact further.

G-26

2. The "Active Adult Option" and its Impact

- **Concern:** The EIR clearly states that the Active Adult option, which is a major component of the preferred RIA, would still exceed the ROG threshold despite having fewer vehicle trips. The document provides the specific reduction amount (15.1 lbs/day) but still concludes the impact is significant.
- **Comment:** The EIR notes that even with the reduced vehicle trips from the Active Adult option, the project would still exceed the ROG threshold. We request that the final EIR's analysis for Alternative 3 (RIA) be as transparent as possible in showing the exact ROG emissions numbers for that specific alternative and comparing them directly to the base project. This will allow the public and the county to clearly see the air quality benefits of the RIA, even if the impact remains significant.

G-27

3. Consistency with Air Quality Plans

- **Concern:** The EIR states that because the project exceeds the EDCAQMD's ROG threshold, it "could conflict with or obstruct implementation of the applicable air quality plan." This is a significant finding that should not be overlooked.
- **Comment:** EDH APAC remains concerned that the project's excess ROG emissions conflict with the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. We would suggest a more explicit explanation from the EDCAQMD on how this project's unmitigated ROG emissions fit into their overall attainment strategy for the region. What is the process for a project that cannot meet the 'project alone' significance criteria but still wishes to move forward?

G-28

4. Health Risks and Sensitive Receptors

- **Concern:** The EIR concludes that the project will have a "less than significant" impact on sensitive receptors from localized CO and toxic air contaminants (TACs) during construction.
- **Comment:** The EIR's conclusion that the project will not expose sensitive receptors to substantial concentrations of localized CO or construction-related TACs is reassuring. However, the EIR also finds that the project will have a significant and unavoidable impact from operational ROG emissions, which are a precursor to ozone (O3). The health effects of O3 exposure are well-documented. We would suggest a more direct discussion on the potential long-term health risks to nearby sensitive receptors (e.g., residents, John Adams Academy) from the project's contribution to regional ozone formation. Even if not precisely quantifiable, a qualitative assessment of this specific health risk should be included.

G-29

5. Emissions from Off-Model Sources

- **Concern:** The EIR mentions a variety of sources but focuses heavily on vehicle trips. It briefly mentions that the majority of ROG emissions come from mobile sources and consumer products.
- **Comment:** The EIR states that the majority of ROG emissions are from mobile sources and consumer products. We support the inclusion of mitigation measure AQ-2, but we also ask for more information on the 'green cleaning product education program.' What specific form will this program take, how will it be made available to all residents, and what will the enforcement mechanism be to ensure this program is effective over the long term?

G-30

Biological Resources 3.3

General Comments

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1. Significant and Unavoidable Impacts

- **Concern:** The EIR states that the project's individual and cumulative impacts on **special-status plants, northwestern pond turtles, tricolored blackbirds, and burrowing owls** are **significant and unavoidable** despite mitigation.
- **Comment:** EDH APAC concurs with the EIR's determination that the project's impacts on special-status species, including the tricolored blackbird, are significant and unavoidable. We urge the applicant and the County to implement the proposed mitigation measures with the utmost care to ensure the project's contribution to these impacts is as minimal as possible. The purchase of mitigation credits, while a necessary step, should be pursued with the highest level of scrutiny to ensure they are effective and provide a true offset for the habitat loss on site.

G-31

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2. Specific Habitat and Species Concerns

- **Tricolored Blackbirds:** The EIR identifies an active tricolored blackbird colony on the project site and acknowledges that construction and human presence could cause colony abandonment. Mitigation is proposed, but the EIR's language indicates it's a known controversy.
- **Comment:** EDH APAC is concerned about the tricolored blackbird colony identified on the project site. Given the species' threatened status and the admission that human disturbance could cause colony abandonment, we request a more detailed and binding plan to protect this colony. Specifically, we ask for a commitment to a **no-disturbance buffer** that is larger than the standard and is permanently protected through a conservation easement or similar legal mechanism. We also request that the project's long-term management plan include specific measures to monitor and protect the colony in perpetuity, not just during construction.

G-32

- **Vernal Pools:** The EIR acknowledges the presence of vernal pools and their importance to sensitive plant species, but also finds that they will be impacted.
- **Comment:** While we appreciate the project's commitment to preserve some of the site's aquatic resources, we are concerned about the direct removal of **0.07 acres of vernal pools**, which are unique and sensitive habitats. We would like to see an analysis of whether the project footprint under **Alternative 3 (RIA)** could be modified to fully avoid these vernal pools, thereby eliminating this impact. This would be a significant step toward demonstrating the project's commitment to reduced environmental impact.

G-33

- **Northwestern Pond Turtle:** The EIR notes that the project has a "low potential" to directly impact this species, which was recently proposed for federal listing.

- **Comment:** We are concerned that the EIR's analysis for the northwestern pond turtle, a species proposed for federal listing, is based on a 'low potential' for occurrence. We recommend that the mitigation measures for this species be as robust as possible, including a requirement for **protocol-level surveys** prior to any ground-disturbing activities. We also request that the project's long-term management plan include measures to protect and enhance the remaining intermittent drainage on the property, which is identified as potential habitat for this species. G-34

3. Mitigation Measures and Long-Term Protection

- **Uncertainty in Offsite Mitigation:** The EIR relies heavily on the purchase of offsite mitigation credits for impacts to wetlands, streams, and special-status species.
- **Comment:** The reliance on offsite mitigation, while a standard practice, creates a level of uncertainty. We ask for more information on the specific mitigation banks that would be used and how the County will ensure that the credits purchased provide equivalent or better habitat value than the habitat being lost. We are concerned that the lack of onsite mitigation for certain impacts could lead to a net loss of habitat value in the project area itself. G-35
- **Enforceability of Mitigation:** Many mitigation measures rely on future actions, such as surveys, work area delineation, and long-term maintenance by an HOA.
- **Comment:** EDH APAC supports the proposed mitigation measures (e.g., BIO-1 through BIO-7), but we have concerns about their long-term enforceability. We recommend that the final project documents clearly state that **all mitigation measures will be conditions of approval** and that the County, in coordination with the project's HOA, will have the necessary enforcement power to ensure compliance in perpetuity. **A reminder: mitigation monitoring should not be a responsibility of residents**, but should be implemented via an effective monitoring program facilitated by County Staff. G-36

4. Overall Conclusion and RIA Support

- **Comment:** In summary, we believe the biological analysis in the Draft EIR is thorough and transparent in identifying significant and unavoidable impacts. The findings reinforce our position that **Alternative 3: Reduced Impact Alternative (RIA)** is the most environmentally responsible option. We urge the County to proceed with the RIA and to strengthen the proposed mitigation measures to ensure that the project's impacts on El Dorado Hills' sensitive biological resources are as minimal as possible. G-37

Cultural Resources 3.4

1. Transparency and Public Access to Information

- **Concern:** The EIR states that the primary cultural resources reports are confidential and not available for public review. While this is done to protect sensitive sites, it limits the public's ability to fully evaluate the findings.
- **Comment:** EDH APAC understands the need for confidentiality regarding the location of sensitive cultural resources. However, this also limits the public's ability to independently verify the EIR's findings. We recommend that the County and the applicant provide a more detailed, yet still confidential, summary of the types of resources found, and the specific mitigation strategies proposed, to relevant community groups to ensure all parties are comfortable with the findings.

G-38

2. The Distinction Between Historic and Archaeological Resources

- **Concern:** The EIR states that no significant "historic built environment resources" were found, but that archaeological resources were identified, and there is a potential for more to be found. The EIR makes a strong distinction between these two types of resources.
- **Comment:** The EIR effectively distinguishes between historic built environment resources and archaeological resources. We support the finding that no significant historical structures are present. Regarding archaeological resources, we agree that the potential for unknown discoveries is significant, given the site's rich history. We support the EIR's conclusion that this is a potentially significant impact and that mitigation measures are necessary.

G-39

3. Mitigation Measures: Specifics and Enforceability

- **Concern:** Mitigation measures CUL-2 and CUL-4 outline procedures for what to do if a discovery is made. These measures, while standard, are critical.
- **Comment:** EDH APAC supports the proposed mitigation measures for the unanticipated discovery of cultural resources (CUL-2) and human remains (CUL-4). To ensure the integrity of these measures, we request that the County clearly define the roles and responsibilities of the archaeological monitor and the project contractor. Additionally, we ask for a commitment that the project's **Improvement Plans** and **Final Maps** will include the full text of these mitigation measures to ensure they are binding and enforceable.

G-40

- **Clarification on Monitoring:** CUL-3 requires an archaeological monitor to be present during ground-disturbing activities within 200 feet of four specific sites.
- **Comment:** EDH APAC is pleased to see a specific archaeological monitoring plan in CUL-3. We request clarification on the full scope of the monitoring. Will the monitor be present full-time during all ground-disturbing activities in the designated areas? What are

G-41

the qualifications of the archaeological monitor? This level of detail is important for the community to feel confident that sensitive resources will be protected.

G-41 Cont.

4. Cumulative Impacts

- **Concern:** The EIR finds that the project will have a potentially significant cumulative impact on archaeological resources and human remains. It concludes that mitigation will reduce this to a "less than significant" level.
- **Comment:** We agree with the finding that the project's incremental contribution to the cumulative loss of archaeological resources is considerable. We support the EIR's conclusion that the proposed mitigation measures (CUL-1 through CUL-3) will reduce this impact to a less-than-significant level. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent cultural resources analysis."

G-42

5. RIA vs. Proposed Project

- **Concern:** The EIR states that the impacts would be the same under the RIA as the proposed project because the "development footprint, intensity, and disturbed area would remain the same."
- **Comment:** The EIR states that the cultural resource impacts for the RIA would be the same as the proposed project. While we understand the rationale, it is worth noting that the RIA's lower overall population and fewer dwelling units could lead to a lesser long-term human disturbance to the open space and trails, which may contain undiscovered cultural resources. We ask that the County consider this long-term, subtle benefit of the RIA when evaluating the project's overall impacts.

G-43

Energy 3.5

1. Transparency and Proactive Measures

- **Concern:** The EIR states that the project's energy use is "not unusual or wasteful" because it is comparable to other projects. This is a baseline, not a goal for a new development in a modern context.
- **Comment:** EDH APAC supports the EIR's conclusion that the project's energy impacts are less than significant due to compliance with state and and local regulations. However, we believe the project has a responsibility to **exceed minimum standards** where feasible. We recommend the EIR discuss the feasibility of implementing energy efficiency measures that go beyond the 2022 Title 24 standards, such as enhanced insulation, high-performance windows, and energy-efficient appliances, to ensure the project is a leader in sustainable development.

G-44

2. All-Electric and Natural Gas Use

- **Concern:** The EIR mentions that the project would be designed to be all-electric and that natural gas infrastructure would be prohibited onsite. This is a very positive finding and a major win for the County's goals.
- **Comment:** EDH APAC appreciates the project's commitment to being an all-electric development, which is a critical step toward reducing greenhouse gas emissions and a move toward a more sustainable energy future. Recognizing this desire from a state and county planning perspective, we also acknowledge that property owners would prefer to be able to choose the energy matrix mix that they prefer.

G-45

3. Solar and Electric Vehicle Infrastructure

- **Concern:** The EIR mentions that the project will comply with solar panel and electric vehicle (EV) charging station requirements under Title 24.
- **Comment:** We support the project's commitment to providing solar panels and EV charging infrastructure in compliance with the California Building Standards Code. We recommend the EIR provide more detail on the specifics of the EV infrastructure. Will all residential units be required to have a dedicated EV charger, or will it be a shared charging station? What are the plans for EV charging in the neighborhood commercial area? We believe a higher level of detail is necessary to ensure the infrastructure will adequately serve the community's needs and support the state's transition to a zero-emissions vehicle fleet.

G-46

4. Cumulative Impacts and Project Contribution

- **Concern:** The EIR finds that the project will have a "less than significant" cumulative impact on energy because all new developments are required to comply with energy efficiency standards.
- **Comment:** We agree with the finding that the project's cumulative energy impacts are less than significant. However, it's important to recognize that a significant amount of new development is planned for the County. We believe the project, particularly with its proposed all-electric and reduced density features under Alternative 3, sets a positive precedent for other projects in the area to follow. This is a key area where the project can and should be a leader for future development.

G-47

Geology, Soils, and Paleontology 3.6

1. Specific Concerns and Clarifications

- **Geotechnical Study and Its Role:** The EIR repeatedly refers to a "design-level geotechnical investigation" that will be required before building permits are issued. The findings of this study are critical for final engineering but are not yet available.
- **Comment:** EDH APAC supports the EIR's conclusion that seismic and soil hazards are less than significant, provided that all recommendations from a future **design-level geotechnical investigation** are fully incorporated into the project's design. We suggest that the final project conditions of approval mandate the completion of this study and its full implementation as a non-negotiable condition for all building permits. This ensures that the EIR's assumptions about proper engineering and mitigation are carried out. G-48
- **Expansive and Soft Soils:** The EIR notes the potential for "pockets of clay soils with expansive properties" and "soft soils" that could lead to settlement. The proposed solution is a program of "over-excavation and recompaction."
- **Comment:** The EIR identifies the presence of expansive and soft soils as a potential hazard for structures. The proposed mitigation involves a program of over-excavation and recompaction. We suggest that the final project documents specify that this work will be overseen by a **certified geotechnical engineer** and that all work will be fully documented and approved by the County before any foundations are laid. This is crucial for protecting the long-term structural integrity of the homes and infrastructure. G-49
- **Slope Stability and Grading:** The EIR states that the project would be built on gentle slopes, but some areas have slopes of 30% or more. The EIR notes that the General Plan restricts development on these steeper slopes.
- **Comment:** EDH APAC is pleased that the project is designed to avoid steep slopes and that the County's policy (7.1.2.1) restricts development on slopes over 30%. We recommend that the final grading plans be made available for public review to confirm that the project footprint, even with re-contouring, fully avoids these sensitive areas and adheres to the natural contours as much as feasible to minimize erosion and landslide risk. G-50
- **Paleontological Resources:** The EIR concludes that the potential for paleontological resources is "remote" due to the site's geology.
- **Comment:** We agree with the EIR's conclusion that paleontological resources are unlikely to be present. However, we suggest that a standard **Unanticipated Discovery Protocol** be included in the project's final conditions of approval. This protocol should outline the steps to be taken in the unlikely event that a fossil is discovered during construction, ensuring that such a find would be properly handled and reported in accordance with state law. G-51

3. Overall Conclusion

- **Conclusion Comment :** In summary, EDH APAC finds the analysis in Section 3.6 to be thorough and well-supported. The findings of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for all recommended geotechnical studies, grading, and soil compaction. This ensures that the project's foundation is as safe and stable as possible for future residents.

G-52

Greenhouse Gas Emissions 3.7

1. The Core Significant Finding

- **Concern:** The EIR states that the project's operational GHG emissions, even with the proposed mitigation measure, would still be above the Sacramento Metropolitan Air Quality Management District (SMAQMD) threshold of significance. However, the EIR concludes that the impact is **less than significant** because the project would be consistent with state and local plans. This is a potential point of contention.
- **Comment:** EDH APAC is concerned that the EIR finds the project's impact to be 'less than significant' despite acknowledging that operational GHG emissions would exceed the SMAQMD's significance threshold. We believe this conclusion is inconsistent with the data presented. We suggest a more detailed justification for this conclusion and a clearer explanation of how the project's emissions will not impede the state's and region's ability to meet their GHG reduction targets.

G-53

2. Mitigation Measure GHG-1

- **Concern:** Mitigation measure GHG-1 is a key component of the project's GHG strategy. It requires an all-electric project with EV-ready parking spaces, and if not feasible, the purchase of off-site mitigation credits. This measure contains a number of potential escape clauses, such as "not enforceable or commercially feasible."
- **Comment:** EDH APAC supports the spirit of mitigation measure GHG-1, which aims to create an all-electric and EV-ready community. However, we are concerned about the language that allows for the use of natural gas if an all-electric design is found to be 'not enforceable or commercially feasible.' We suggest that the County clearly define these terms and provide a process for public review and a final determination by a third party. We believe that an all-electric design should be a binding requirement from the outset, not a conditional one.

G-54

- **Off-site Mitigation Credits:** The EIR allows for the purchase of off-site mitigation credits if an all-electric design is not feasible. This can be a problematic practice if the credits are not of high quality.
- **Comment:** EDH APAC is concerned about the reliance on off-site mitigation credits, or 'GHG credits,' to offset emissions. We believe that on-site mitigation is always preferable. If off-site credits are used, we ask that the County's review process be rigorous and transparent. We recommend that the County's review include a public hearing to ensure the credits are 'real, permanent, quantifiable, verifiable, enforceable, and additional,' as defined in the EIR, and that the community has a chance to comment on the plan.

G-55

3. Consistency with Plans and Policies

- **Concern:** The EIR concludes that the project is consistent with the state's Scoping Plan and the SACOG's MTP/SCS.
- **Comment:** EDH APAC is pleased that the project is consistent with the state's and region's plans for GHG reduction, including CARB's Scoping Plan and the SACOG's MTP/SCS. The project's commitment to reduced vehicle miles traveled (VMT) and a dense, walkable design are key components of this consistency. This reinforces our support for the Reduced Impact Alternative (RIA), which would further reduce VMT and be even more consistent with these plans.

G-56

4. Cumulative Impacts

- **Concern:** The EIR concludes that the project, along with other projects, would not result in a significant cumulative impact related to GHG emissions. The EIR uses a less-than-significant threshold based on SMAQMD's guidelines.
- **Comment:** We agree with the finding that the project's cumulative GHG impacts are less than significant, as the project's emissions are below the SMAQMD's threshold. This finding reinforces the importance of all future projects in the County adhering to these standards to ensure the region as a whole can meet its GHG reduction targets.

G-57

5. Final Recommendations

- **Comment:** In summary, EDH APAC supports the project's commitment to GHG reduction and its consistency with state and local plans. We believe that the project's impacts can be minimized by making the mitigation measures for an all-electric design more stringent and by ensuring a transparent and rigorous process for the review of any off-site mitigation credits. We believe the project, and particularly the **Reduced Impact Alternative (RIA)**, is a step in the right direction for the County's goal of projects with a sustainable future.

G-58

Hydrology and Water Quality 3.8

2. Specific Concerns and Clarifications

- **Community Concerns:** The EIR mentions concerns from residents of the Carson Creek Specific Plan about the project's impact on the Carson Creek Preserve.
- **Comment:** EDH APAC values the input of Community members in regards to the ongoing support of the Carson Creek Preserve. Our Environmental Standing Committee members appreciated the amount of discussion and dialog that the project applicants provided to both the Committee, and community members regarding the Carson Creek Preserve. G-59
- **Concern:** The EIR relies on the implementation of Best Management Practices (BMPs) and Low Impact Development (LID) features to manage stormwater. While these are good in theory, their effectiveness depends on proper maintenance over the long term.
- **Comment:** EDH APAC supports the project's plan to implement a Stormwater Drainage Master Plan with a variety of BMPs and LID features, including bioswales and detention basins. However, we are concerned about the **long-term maintenance and funding** for these systems. We request that the final project documents include a clear, binding plan for the perpetual maintenance of all stormwater facilities, overseen by a dedicated entity (e.g., the HOA) with a sufficient funding mechanism, such as a special assessment district. Zone of Benefit, CSA, or other dedicated funds, to ensure the features remain effective in perpetuity. G-60
- **Concern:** The EIR states that a "hydromodification pond" and other features will protect the downstream Carson Creek Preserve from adverse impacts.
- **Comment:** EDH APAC is pleased that the Draft EIR directly addresses the potential impacts on the Carson Creek Preserve. We recommend that the final project plans include a detailed description of the proposed hydromodification pond and other in-stream measures. We would like to see a clear analysis of how these features will specifically protect the preserve from increased sedimentation and changes in flow rates and timing, particularly during major storm events. We also recommend that the County's inspection process specifically include the downstream preserve to ensure no degradation occurs as a result of project construction or operation. G-61
- **Concern:** The EIR acknowledges that the project will result in a "substantial increase in impervious surfaces" but concludes that this will be mitigated by the stormwater system.
- **Comment:** While the EIR claims that the stormwater plan will fully mitigate the effects of increased impervious surfaces, we ask that the County provide more detail on the specific calculations and modeling used to support this conclusion. We are particularly interested in how the system will handle a 'first flush' event, which often carries the highest concentration of pollutants, and a catastrophic storm event that exceeds the capacity of the stormwater system. The design should be robust enough to handle these contingencies without impacting downstream water quality. G-62

- **Concern:** The EIR finds that groundwater recharge and quality will not be significantly impacted because the site is not located within a defined groundwater basin.
- **Comment:** EDH APAC accepts the finding that the project will not interfere with a groundwater basin. However, we ask that the final plan clarify how the project's LID features, such as infiltration basins, will protect localized groundwater from contamination. While the water is not used for drinking, it is still a resource that should be protected from any potential pollutants from the development.

G-63

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3. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the analysis in this section to be comprehensive and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-64

Land Use, Population and Housing 3.9

1. Land Use Change and Consistency with Plans

- **Concern:** The project requires a General Plan Amendment from a Research & Development (R&D) designation to a residential designation. The EIR states this is not a conflict because the new designation (Adopted Plan) is consistent with the General Plan and its objectives for housing.
- **Comment:** EDH APAC understands that a General Plan Amendment is required to change the designation from Research & Development (R&D) to Adopted Plan (AP) to allow for residential development. While the EIR argues this is consistent with the General Plan, we emphasize the importance of this shift. We request that the County's final approval process for the Specific Plan explicitly and transparently demonstrate how the new residential land use designation aligns with the broader community goals and the overall vision for the area, which was previously designated for employment-focused R&D uses.

G-65

- **Concern:** The EIR mentions that the project is "consistent with the surrounding communities" but does not provide extensive detail on how a high-density residential community will interface with the adjacent Business Park.
- **Comment:** The EIR states that the proposed land uses are compatible with the surrounding residential communities. We request a more detailed analysis of the compatibility with the existing El Dorado Hills Business Park to the north and the industrial uses to the south. We ask for a clear explanation of how the design of the residential community, including its parks and open space buffers, will prevent land-use conflicts (e.g., noise, lighting, traffic) between the new residents and the existing business park and industrial areas.

G-66

2. Population Growth and The Reduced Impact Alternative (RIA)

- **Concern:** The EIR finds that the project's population growth (2,314 new residents) is within the SACOG MTP/SCS forecast. The EIR also analyzes the Active Adult Option, which reduces the population to 1,540 residents, and states this is also consistent.
  Comment: The EIR's analysis of the Active Adult Option, a key component of our preference for **Alternative 3 (RIA)**, is very important. The analysis projects a significant population reduction of approximately 33.5% (from 2,314 to 1,540 residents) compared to the base project. This reduction is a clear, quantifiable benefit that directly addresses community concerns about population growth. We urge the County to prioritize this alternative, as it represents a more sustainable approach to development that aligns with a more moderate growth pattern for the County. The lower population will also result in fewer impacts on public services, schools, and traffic.

G-67

- **Concern:** The EIR correctly notes that CEQA views population growth as a social/economic issue and not a direct environmental impact unless it leads to a physical change.
- **Comment:** EDH APAC understands the legal framework of CEQA, where population and housing changes are not considered environmental impacts in and of themselves. However, we believe that the reduction in population under the RIA directly lessens the secondary, or indirect, physical impacts on the environment that are analyzed in other sections of the EIR, such as air quality, transportation, and public services. The reduced population of the RIA offers a direct and measurable benefit to the community's infrastructure and resources.

G-68

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3. Housing and Affordability

- **Concern:** The EIR mentions that the project will provide a variety of housing types and that ADUs are permitted by state law. However, it states that the project is not designed to encourage ADUs and does not analyze their potential impact.
- **Comment:** The EIR notes that the project, and particularly the CV-SFM-PD residential designation, includes a mix of housing types. This aligns with a key goal of the County's Housing Element. We also appreciate that the plan allows for Accessory Dwelling Units (ADUs). We recommend that the final project design and HOA covenants be structured to actively **encourage** the development of ADUs as a way to provide more diverse and affordable housing options, which is a key goal of the state and County.

G-69

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4. Overall Summary

- **Comment:** In summary, while the EIR finds the base project to be consistent with state and local land use plans, the analysis of population and housing clearly shows that the **Reduced Impact Alternative (RIA)** offers a superior outcome for the community. The significant reduction in population under the RIA directly addresses a key area of public concern and provides a measurable and lasting benefit to the community's infrastructure and quality of life.

G-70

Noise section 3.10

2. Specific Concerns and Clarifications on Mitigation

- **Concern:** The EIR's primary mitigation for traffic noise (NOI-4) and park noise (NOI-2) is the construction of solid noise barriers. The EIR also mentions that these barriers could be "masonry wall, earthen berm, or combination of the two."
- **Comment:** We support the use of noise barriers to protect both existing and future residents from excessive noise. However, we are concerned about the visual impact of these barriers, which was identified as a significant issue in the Aesthetics section. We request a more detailed visual analysis, such as a series of renderings, of the proposed noise barriers from public viewpoints, including Latrobe Road. We also request that the final barrier design be required to use materials that are visually compatible with the surrounding environment, such as a combination of an earthen berm with a decorative wall, to minimize the aesthetic impact. G-71
- **Concern:** The EIR finds that park noise could have a significant impact on nearby proposed residential units and requires a 6-foot solid noise barrier.
- **Comment:** EDH APAC is concerned about the potential for noise from the proposed parks to impact future residents. While mitigation measure NOI-2 requires noise barriers, we also request that the final project documents include specific rules and regulations for park hours and usage to be enforced by the HOA. This would provide an additional layer of protection for residents and help ensure that the parks are a positive amenity for the community. G-72
- **Concern:** The EIR finds that amplified outdoor music from potential commercial uses (e.g., a brewpub) could have a significant noise impact.
- **Comment:** We agree with the finding that amplified outdoor music is a potentially significant noise impact. We support mitigation measure NOI-3, which requires a separate acoustic analysis for any commercial use with live or amplified music. We request that the County's review process for such a permit be a public hearing, allowing for community input on the potential noise impacts. Additionally, we ask that the final approval for such a use include strict conditions on hours of operation and decibel limits. And finally, a monitoring program should be an active and ongoing process provisioned by the County. While a monitoring program should include resident feedback and support, the responsibility of ongoing monitoring should not be a burden left wholly to residents. G-73
- **Concern:** The EIR's informational analysis finds that some residential units near Latrobe Road will require upgraded windows and mechanical ventilation (air conditioning) to meet interior noise standards.
- **Comment:** EDH APAC has reviewed the informational analysis on interior noise and agrees that mitigation measure NOI-5, which requires upgraded windows and mechanical ventilation for some residential units, is necessary. We request that this G-74

measure be a **binding condition of approval** for any residential unit that is predicted to be exposed to noise levels that exceed the interior noise standard. This is crucial for ensuring the health and safety of future residents."

G-74 Cont.

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3. Traffic Noise and RIA

- **Concern:** The EIR finds that the project's traffic noise impacts on the existing community are "less than significant" because the increase is below the threshold of human perception. It also notes that the Active Adult Option would generate even less traffic noise.
- **Comment:** The EIR finds that the project's traffic noise impact is less than significant, and we agree with this finding. This conclusion is further strengthened by the data for the **Active Adult Option**, which projects a significant reduction in daily vehicle trips. This finding is a strong argument in favor of the Reduced Impact Alternative, as it provides a clear and measurable benefit to the community's noise environment."

G-75

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4. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the noise analysis to be a thorough and transparent assessment of the project's impacts. We support the EIR's proposed mitigation measures but ask for more detail and transparency in their implementation and enforcement. We also believe that the noise benefits of the **Reduced Impact Alternative**, particularly its reduced traffic noise, provide a compelling reason to move forward with that option.

G-76

Public Services and Recreation 3.11

1. Fire Protection and Emergency Medical Services

- **Concern:** The EIR states that the project's increase in population will not require a new fire station because EDH Fire has adequate personnel and equipment. It also points to the proximity of Station 87 and mutual aid agreements as sufficient. However, the EIR does not explicitly state that the project will have no impact on the County's 8-minute response time goal.
- ~~**Comment:** We appreciate the detailed information on the El Dorado Hills Fire Department's resources and the proximity of Station 87. However, the EIR's conclusion that the project will have a less-than-significant impact on fire protection services is based on the assumption that existing services are adequate. We request a more direct analysis of how the project's population will affect the County's General Plan goal of an **8-minute response time for Community Regions**. We ask for a clear statement from EDH Fire on whether they anticipate being able to meet this goal for the new community and what specific, binding actions would be required to maintain it.~~
- ***EDH FIRE RESPONSE PROVIDED TO EDH APAC August 18, 2025 :*** *Station 87 is located at 4680 Golden Foothill Parkway in the EDH Business Park. This engine has an estimated response time of 3-4 minutes to the project. Engine 87 responds to approximately 1,453 calls for service annually. That equates to approximately 4 calls every 24 hours. Engine 87 has sufficient capacity to accommodate the increased population created by this project.*
  Supporting Engine 87 is Engine 91 located at 7660 S. Shingle Road. This engine has an estimated response time of 7-8 minutes to the project. Engine 91 responds to approximately 80 calls for service annually. That equates to approximately 0.22 calls every 24 hours. Engine 91 is the designated move-up and cover engine that will backfill Engine 87's response area when it is committed to a long-term incident. Engine 91 has more than sufficient capacity to provide backup coverage to support project.
  Also supporting Engine 87 is Engine 85 located at 1050 Wilson Blvd. This engine has an estimated response time of 8-10 minutes to the project. Engine 85 responds to approximately 918 calls for service annually. That equates to approximately 2.5 calls every 24 hours. Engine 85 has sufficient capacity to provide backup coverage to support project.
- **Concern:** The EIR mentions the existence of a Fire Safe Plan (Appendix J) but does not provide details. This is a critical document given the project's location.
- **Comment:** EDH APAC considers the Fire Safe Plan to be a critical document for public safety. We request that the County provide public access to this plan for a full review. We are particularly interested in the plan's provisions for emergency access, evacuation

G-77

routes, and vegetation management, and how these will be enforced in perpetuity, especially with respect to the new homeowners' association.

G-77 Cont.

2. Law Enforcement

- **Concern:** The EIR concludes that law enforcement impacts are less than significant because the El Dorado County Sheriff's Office already exceeds its staffing goal of one deputy per 1,000 residents and that the project's impact fees and property taxes will fund future needs.
- **Comment:** EDH APAC accepts the EIR's conclusion that the project will not require a new law enforcement facility. We also acknowledge that the project's population will not cause the Sheriff's Office to fall below its staffing goal. However, we ask for a more specific analysis of how the project's population will be integrated into the West Slope Patrol's service area and whether a new substation or additional patrols would be required to maintain response times and service levels. We also request a clear explanation of how the project's tax revenues will be directly funneled to law enforcement services to support the new population.

G-78

3. Schools

- **Concern:** This is the most complex section. The EIR finds a significant need for new or expanded elementary and middle schools due to the project's student generation. However, it concludes that the impact is "less than significant" because the payment of statutory school impact fees under SB 50 is considered "full mitigation" under state law. It also points to the Active Adult Option as a way to "address" the concerns of the Latrobe School District.
- **Comment:** EDH APAC recognizes that the project's generation of over 486 new elementary and middle school students will have a significant impact on the Latrobe School District, which currently has a combined enrollment of only 162 students. We understand that under SB 50, the payment of development fees is considered 'full mitigation' for the purposes of CEQA. However, we believe this does not fully address the physical and logistical reality of a more than tripling of the student population. We strongly urge the applicant and the County to prioritize the **Active Adult Option** as a direct response to this significant impact on the school district, as it would reduce the student count from 603 to 99 students. This is the most responsible way to proceed, as it addresses a significant community concern that is not fully mitigated by impact fees alone.
- **Concern:** The EIR finds that Oak Ridge High School has more than enough capacity for the project's students, and enrollment is projected to decrease.
- **Comment:** We are pleased with the finding that the project's high school students can be accommodated within the existing capacity of the El Dorado Union High School District. However, enrollment projections by the EDUHSD in the past have forecasted

G-79

G-80

declining enrollment at the Oak Ridge campus, and yet the community has witnessed for years that the campus remains impacted by a student enrollment significantly larger than the school was originally designed and built to accommodate.

G-80 Cont.

4. Parks and Recreation

- **Concern:** The EIR finds that the project provides enough parkland (13.6 acres) to meet the County's standards (12.9 acres). It concludes that there will be no impact on existing parks.
- **Comment:** EDH APAC is pleased that the project is designed to meet and exceed the County's parkland dedication standards. We are also glad to see the inclusion of an option to convert the 1.8-acre commercial site into a park, which would further increase the parkland ratio. We request that the final project plans include a detailed conceptual design for the parks, including specific amenities, to ensure they will serve the community's needs and truly function as 'focal points,' as mentioned in the project's objectives. We also want to ensure that the public has access to the parks, even if they are maintained by a private HOA. EDH APAC seeks clarification on if a deed restriction would be possible to facilitate public access to these park facilities if maintained by an HOA

G-81

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds that the project's impacts on public services and recreation can be managed, but that a more transparent and detailed plan for mitigation and funding is needed. We believe the most effective way to address the significant concerns about school capacity is to move forward with the **Reduced Impact Alternative (RIA)**. This alternative, with its lower student generation and population, is the most responsible choice for the Creekside Village Specific Plan.

G-82

Transportation 3.12

1. VMT Analysis and CEQA Compliance

- **Concern:** The EIR states that the project's VMT per capita is below the County's threshold, so the impact is less than significant. This is a crucial CEQA finding. The EIR also notes that the preferred **Alternative 3 (RIA)** would have an even lower VMT due to fewer trips.
- **Comment:** EDH APAC acknowledges and supports the EIR's conclusion that the project's VMT per capita is below the County's threshold. This finding is a key factor in our support for the project. We also note that the analysis for the **Active Adult Option** projects an even greater reduction in trips and VMT, which further strengthens the case for moving forward with that alternative as the most sustainable choice for the community. We recommend that the County formally adopt this finding as a primary benefit of the RIA.

G-83

2. Traffic Operations and Real-World Impact

- **Concern:** The EIR explicitly states that a "project's effect on automobile delay and traffic LOS is not considered a significant environmental impact" under CEQA. This means the EIR does not have to analyze the everyday traffic congestion that residents will experience. The TIS, however, does contain this analysis for informational purposes.
- **Comment:** EDH APAC understands that CEQA no longer requires an analysis of traffic Level of Service (LOS) and vehicle delay as a significant environmental impact. However, this is complicated by CEQA requirements of consistency with the County's General Plan, and the General Plan's implicit inclusion of LOS metrics in the Transportation Element. Additionally, the real-world experience of traffic congestion is a primary concern for the community. We request that the County make the full LOS analysis from the Transportation Impact Study (TIS) publicly available and easy to access. This will allow the community to understand the project's traffic impacts and whether the proposed roadway and intersection improvements will be sufficient to mitigate everyday congestion.

G-84

- **Concern:** The EIR mentions several off-site roadway improvements that are needed to accommodate the project's traffic. These include signalization at the Latrobe Road/Royal Oaks Drive intersection.
- **Comment:** The EIR's conclusion that the project will not substantially increase hazards relies on the assumption that necessary roadway improvements will be made. We request a clear, binding commitment from the applicant and the County on the **specific timeline and funding mechanisms for all off-site roadway and intersection improvements**. This is crucial to ensure that new residents can access the community

G-85

safely and that existing residents do not experience a decline in traffic flow before these improvements are made. As mentioned earlier, assuming that improvements can be realized via the auspices of the County's twenty-year CIP horizon will result in most of the improvements not being constructed. Roadway improvements at a minimum must be concurrent with the buildout of the project.

G-85 Cont.

3. Pedestrian and Bicycle Facilities

- **Concern:** The EIR finds that the project will enhance bicycle and pedestrian access. It also *mentions* a **potential** Class I trail along the Placerville & Sacramento Valley Railroad rail line. This is a major benefit for the community.
- **Comment:** EDH APAC is very pleased with the project's commitment to enhancing bicycle and pedestrian access, including the construction of internal trails and sidewalks that connect to existing facilities. This aligns with our goals for a walkable and bike-friendly community.
  However - there is no official proposed "plan" for the Class 1 trail as of the end of this comment period on the DEIR. EDH APAC requests more specific details on the project's plan to connect to the proposed Class I trail along the Placerville & Sacramento Valley Railroad rail line to ensure that a seamless network is created. This is a short segment to connect to the Placerville & Sacramento Valley Railroad rail line from the Plan Area, and should be adopted as a formal component of the Specific Plan's Transportation element.

G-86

4. Emergency Access and Safety

- **Concern:** The EIR finds that emergency access will be adequate and mentions a new emergency access road that will be gated and used as a bike path. This is a critical safety feature.
- **Comment:** EDH APAC considers emergency access and safety to be of paramount importance. We support the EIR's conclusion that the project will have adequate emergency access. We ask for a more detailed plan for the new emergency access road, including its specific location, how it will be gated, and the protocol for its use during an emergency. This information is crucial for ensuring the safety of all residents, both new and existing.

G-87

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the transportation analysis to be a comprehensive assessment of the project's VMT impacts and an informative look at its operational impacts. We support the EIR's conclusions regarding VMT and safety, but we ask for more detail and transparency on the specific plans and funding for roadway improvements. We believe that the **Reduced Impact Alternative (RIA)**, with its

G-88

significantly lower trip generation, is the most responsible choice for the Creekside Village Specific Plan and will provide the greatest long-term benefit to the community's transportation network.

G-88
Cont.

Tribal Cultural Resources 3.13

1. Acknowledgment of Tribal Consultation and Confidentiality

- **Comment:** EDH APAC acknowledges and appreciates the thorough tribal consultation process undertaken by the applicant and the County, as detailed in this section. We understand that confidentiality is paramount to protecting these sensitive resources, and we respect the tribal governments' requests to keep specific information private. The willingness of all parties to engage in government-to-government consultation is a positive sign for the project.

G-89

2. Significant Impacts and Mitigation

- **Concern:** The EIR clearly states that several precontact archaeological resources (P-09-006004, P-09-006011, P-09-006012, and P-09-000157) were identified as TCRs by the consulting tribes. The EIR also states that the project's original design would have a significant impact on these resources. The conclusion is that this is a **significant and unavoidable** impact even with mitigation.
- **Comment:** We agree with the EIR's conclusion that the project, as originally proposed, would have a significant and unavoidable impact on the identified Tribal Cultural Resources. The EIR's discussion of the tribes' perspective—that they are the contemporary stewards of their culture and the landscape—underscores the gravity of this finding. It is clear that the preservation of these resources is of critical importance to the tribal governments. The commitment to a **cultural avoidance alternative**, which led to the Reduced Impact Alternative (RIA), is a direct and necessary response to this finding.

G-90

- **Concern:** The EIR states that the project applicant developed a "cultural avoidance alternative" which led to the RIA. This alternative avoids a majority of the TCRs.
- **Comment:** We are pleased that the consultation process led to the development of an alternative design that avoids a majority of the identified TCRs. This is a clear demonstration of the applicant's and the County's commitment to mitigating this significant impact. EDH APAC **strongly endorses the Reduced Impact Alternative (RIA)** as the most responsible and culturally sensitive path forward for this project. This alternative, which prioritizes the avoidance and protection of TCRs, should be the preferred and recommended option.

G-91

- **Concern:** The EIR outlines mitigation measures for unanticipated discoveries of human remains and cultural resources. These include training, monitoring, and specific protocols. The EIR also explicitly states that the tribes expressed the importance of certain TCRs remaining in their current location.

- **Comment:** We support the proposed mitigation measures (TCR-1 through TCR-5) for unanticipated discoveries and the relocation of resources if avoidance is not possible. To ensure the integrity of these measures, we request that the final project conditions of approval include a binding requirement for **tribal monitoring** during all ground-disturbing activities in areas identified as sensitive. Additionally, we ask for a commitment that in-place preservation will be the priority, and that relocation, if necessary, will only be done in consultation with the tribes and with their full consent. The commitment to providing secure on-site storage for culturally sensitive materials is also a welcome and necessary measure.

G-92

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3. Cumulative Impacts

- **Concern:** The EIR finds that the project would make a "cumulatively considerable contribution" to a significant cumulative impact on TCRs. This is because these resources are non-renewable and all adverse effects contribute to a dwindling resource base.
- **Comment Suggestion:** We agree with the EIR's conclusion that the project's incremental contribution to the cumulative loss of TCRs is considerable. This finding reinforces the need for all future projects in the County to undergo a similarly thorough and transparent tribal consultation process. The existence of the **Reduced Impact Alternative (RIA)**, which was developed in direct response to tribal concerns, demonstrates that a project can move forward while also protecting significant cultural heritage. We believe this alternative represents the best path forward for the Creekside Village Specific Plan and a model for future development in the County.

G-93

Utilities and Service Systems 3.14

1. Water Supply and Demand

- **Concern:** The EIR states that the project's water demand (481 AFY for the base project) is well within the El Dorado Irrigation District's (EID) supply, even during multiple dry years. The EIR also references EID's Integrated Water Resources Master Plan which identified a future **capacity deficit of 45 mgd in 2030** for the El Dorado Hills Water Treatment Plant (WTP). The project's demand, while small, is additive to this known deficit.
- **Comment 1:** EDH APAC is concerned that while EID has sufficient water supply, the EIR acknowledges a projected deficit in water treatment capacity at the El Dorado Hills Water Treatment Plant (WTP). We request a more explicit statement from EID regarding the specific steps being taken to expand the WTP to meet the cumulative demand from new development, including this project. It is crucial that the capacity deficit is addressed before new development contributes to the strain on the system. G-94
- **Comment 2:** EDH APAC is concerned about EID's Draft EIR in progress for a proposed Modification of Water Right Permit 21112 to create an additional diversion at the existing El Dorado Diversion Dam near Kyburz. This would facilitate a downstream flow of water to other unincorporated areas, rather than routing from Folsom Lake like the rest of El Dorado Hills. They are evaluating this solution vs. extensive energy-intensive pumping of raw and treated water from Folsom Reservoir. Creekside Village SP was included in their growth analysis but, what is unclear, is if CVSP will be affected or delayed by this decision and EIR approval. What is the plan and timeline for delivery to get water to the CVSP area, since there is no current utility infrastructure? G-95
- **Concern:** The EIR mentions that age-restricted units use approximately 40% less water. This is a significant benefit of the preferred alternative.
- **Comment:** EDH APAC notes the significant finding that the **Active Adult Option** would reduce water consumption by an estimated 40% per age-restricted unit. This represents a substantial water savings for the community and is a key reason for our support of the Reduced Impact Alternative (RIA). We urge the County to formally recognize this water savings as a tangible benefit of the RIA. G-96

2. Wastewater

- **Concern:** The EIR states that the project's wastewater generation will not exceed the current capacity of the El Dorado Hills Wastewater Treatment Plant (WWTP). However, it also mentions that the plant is expected to reach its current capacity in 2025 and that an expansion to 5.45 mgd is planned for 2026. The EIR acknowledges that the project's demand is additive to this future planned expansion.

- **Comment:** We understand that the project's wastewater generation will be accommodated by the El Dorado Hills Wastewater Treatment Plant (WWTP). However, we are concerned about the timing of the planned expansion. We request confirmation that the WWTP expansion will be completed and fully operational before the project's phased buildout contributes a significant increase in demand. We would also like to know if there is a plan to ensure that the project's impact fees contribute directly to the funding of this expansion, and not be borne as an expense of current EID ratepayers.

G-97

3. Solid Waste

- **Concern:** The EIR concludes that solid waste impacts are less than significant because there is adequate landfill capacity for the project's estimated waste (2,064 cubic yards per year). It also mentions that the landfill is expected to cease operations in 2048.
- **Comment:** EDH APAC is pleased that the project is not anticipated to exceed the capacity of the local solid waste facilities. We support the project's commitment to complying with the County's Construction and Demolition Debris Recycling Ordinance. We recommend that the project's final conditions of approval require a waste management plan for both the construction and operational phases to ensure that waste diversion goals are met.

G-98

- **Concern:** The EIR mentions that the Active Adult option would generate approximately 33% less waste than the base project.
- **Comment:** EDH APAC notes that the **Active Adult Option** would generate significantly less solid waste than the base project. This is another environmental benefit of the Reduced Impact Alternative (RIA) that should be formally recognized by the County.

G-99

4. Other Utilities

- **Concern:** The EIR states that the project will be served by PG&E and Pioneer Community Energy and that new infrastructure will be installed underground.
- **Comment:** We are pleased with the commitment to undergrounding new utility lines, which is a key aesthetic and safety benefit. We request confirmation that this commitment extends to all new utility distribution lines associated with the project, both on- and off-site.

G-100

5. Overall Conclusion

- **Comment:** In summary, EDH APAC finds the utilities analysis to be thorough and well-reasoned. The conclusions of a less-than-significant impact are acceptable, provided that the project's approval includes robust and enforceable conditions for long-term maintenance of all stormwater systems and a transparent process for ensuring the protection of the downstream Carson Creek Preserve. The reduced density and

G-101

footprint of the **Reduced Impact Alternative (RIA)** would naturally lead to fewer impervious surfaces and therefore a lower risk of stormwater impacts, which we believe is a significant benefit of that alternative.

G-101
Cont.

Wildfire 3.15

1. General Observations

- **Comment:** EDH APAC agrees with the EIR's finding that the project has a **"potentially significant impact"** on wildfire risk. This is a transparent and accurate finding that demonstrates a recognition of the inherent dangers of building in this area.
- **Comment:** The EIR outlines a multi-layered approach to mitigation, including a Fire Safe Plan, ignition-resistant building materials, defensible space, and an education program for residents. EDH APAC expresses support for this comprehensive strategy.
- **Comment:** The EIR notes that the **Active Adult Option** would have a 33.5% reduction in residents, which would reduce the number of people exposed to wildfire hazards.

G-102

2. Evacuation and Emergency Response

- **Concern:** The EIR states that the project will have a "less than significant" impact on emergency response and evacuation plans. This is a crucial conclusion that relies on the effectiveness of new access points and Latrobe Road as an evacuation route. However, it also acknowledges that the County does not publicly distribute evacuation plans.
- **Comment:** EDH APAC is deeply concerned with the finding that the project will not impair an adopted emergency response or evacuation plan, especially since the County's plans are not publicly available. The EIR's conclusion relies on a qualitative assessment and an assumption that Latrobe Road will be a sufficient evacuation route for all new residents. We request a **quantitative analysis of evacuation times** for the new community and the surrounding area under a worst-case wildfire scenario. This analysis should consider the traffic from the project, the existing Blackstone, and Heritage communities, other surrounding developments, and the Eastridge development, currently under construction. A "less than significant" finding is difficult to accept without this critical data.
- **Concern:** The EIR mentions five emergency access points, including one to the adjacent business park.
- **Comment:** The inclusion of multiple emergency access points is a positive feature. We request more specific details on the legal status and guaranteed long-term maintenance of these access points, particularly the one connecting to the business park. EDH APAC needs to be assured that these access points will be functional and accessible to fire and emergency services at all times.

G-103

G-104

3. Fire Safe Plan and Long-Term Maintenance

- **Concern:** A major component of the mitigation strategy is the **Fire Safe Plan (FSP)**, which outlines specific requirements for defensible space, fuel modification, and building

standards. The EIR states that the HOA will be responsible for enforcing and maintaining many of these measures.

- **Comment:** EDH APAC supports the comprehensive and detailed requirements of the Fire Safe Plan (WF-2). However, the long-term effectiveness of this plan hinges on the ability of the homeowners' association (HOA) to enforce and fund these requirements in perpetuity. We request that the final project documents include a legal mechanism, such as a permanent maintenance district, Zone of Benefit, CSA, or a dedicated funding source, that ensures the continued enforcement of the FSP's provisions, particularly for the Wildfire Fuel Reduction Zone (WFRZ) and defensible space, even if the HOA fails to do so. This is a matter of public safety that should not be left to chance. G-105
- **Concern:** Mitigation measure WF-4 requires a fire-resistant landscape plan.
- **Comment:** We are pleased with the requirement for a fire-resistant plant palette (WF-4). We request that the County's final approval include a list of prohibited and recommended plants to guide new residents and the HOA. This provides clarity and helps ensure that the new community is as fire-resistant as possible from the outset. G-106

4. Post-Fire Hazards

- **Concern:** The EIR finds that the project could expose residents to post-fire hazards (WF-6), such as flooding or erosion, but concludes that this is a "less than significant" impact due to a proposed post-fire assessment plan.
- **Comment:** The EIR correctly identifies the risk of post-fire hazards, particularly erosion and flooding. While mitigation measure WF-6 requires a post-fire field assessment, we believe the project's design should be more resilient from the start. We recommend that the final drainage and grading plans be reviewed by a qualified hydrologist and engineering geologist to ensure they can withstand the effects of a severe wildfire and not increase the risk of post-fire erosion or flooding for both the project and downstream communities. G-107

5. Overall Conclusion

- **Comment:** "In summary, the committee finds the wildfire analysis to be a thorough and transparent assessment of the project's risks. We support the EIR's proposed mitigation measures but believe that more concrete and binding assurances are needed for evacuation planning, long-term maintenance, and post-fire hazards. We strongly believe that the **Reduced Impact Alternative (RIA)**, with its significantly lower population, is the most responsible choice for the Creekside Village Specific Plan and represents a more sustainable approach to development in a high-fire-hazard area. G-108

Other CEQA Considerations 4

1. Significant and Unavoidable Impacts

- **Aesthetics:** The EIR confirms that the project's impact on scenic vistas and visual character is **significant and unavoidable**.
- **Air Quality:** The EIR confirms that the project's conflict with the applicable air quality plan and its contribution to regional non-attainment pollutants are **significant and unavoidable**.
- **Tribal Cultural Resources:** The EIR confirms that the project's impact on a tribal cultural resource is **significant and unavoidable**.
- **Comment:** EDH APAC has reviewed the list of significant and unavoidable impacts and agrees with the EIR's findings. This is a transparent acknowledgment of the project's most serious environmental consequences. These findings, particularly the impacts on aesthetics and tribal cultural resources, underscore our committee's strong belief that the **Reduced Impact Alternative (RIA)** is the responsible path forward. While the RIA does not completely eliminate all significant impacts, its reduced density and preservation of cultural resources directly address these concerns in a more meaningful way than the base project.

G-109

2. Significant Irreversible Environmental Changes

- **Concern:** The EIR states that the conversion of 208 acres of undeveloped land to urban uses is an **irreversible environmental change**. It also notes the permanent consumption of nonrenewable resources. The EIR concludes that these changes are less than significant because the project is in compliance with regulations.
- **Comment:** EDH APAC acknowledges that the project will result in the irreversible conversion of undeveloped land to urban uses and the permanent consumption of natural resources. While we understand the EIR's conclusion that this is a less-than-significant impact, we believe the irreversible nature of this change demands a commitment to the most sustainable development possible. We support the EIR's finding that the RIA would have the same irreversible impacts, but we suggest that its lower density and reduced population represent a more conservative and sustainable use of these resources, making it the more prudent choice for the community's long-term future.

G-110

3. Growth-Inducing Impacts

- **Concern:** The EIR concludes that the project is **not significantly growth-inducing** because it is consistent with regional growth projections and does not extend infrastructure to previously unserved areas.

- **Comment:** EDH APAC agrees with the EIR's conclusion that the project is not significantly growth-inducing. We are pleased that the project is designed to serve only its own needs and does not extend infrastructure in a way that would spur unplanned growth in other areas. This is a critical finding that aligns with our community's goals for managing growth responsibly.

G-111

4. Overall Conclusion

- **Comment:** In summary, the **Other CEQA Considerations** section effectively summarizes the most critical findings of the Draft EIR. The numerous significant and unavoidable impacts, particularly in aesthetics and tribal cultural resources, highlight the need for a more environmentally sensitive approach. EDH APAC's preference for the **Reduced Impact Alternative (RIA)** is rooted in its ability to directly address these significant impacts, while still providing a well-planned community consistent with the County's and region's long-term growth projections. We believe the RIA represents the more responsible and sustainable path forward for the Creekside Village Specific Plan.

G-112

Alternatives 5

1. General Observations

- **Comment:** The EIR is very clear that other than Alternative 1: No Project/No Development, Alternative 3 (the Reduced Impact Alternative, or RIA) is the **environmentally superior alternative** and that it was developed in direct response to tribal and other environmental concerns.
- **Comment:** The EIR states that the RIA avoids the significant and unavoidable impacts of the proposed project on Air Quality and Tribal Cultural Resources. It also states that the RIA is environmentally superior to both the Proposed Project and the Zoning Consistent Alternative.

G-113

2. Specific Alternatives

Alternative 1: No Project/No Development

- **Concern:** The EIR correctly identifies the No Project/No Development Alternative as the one with the fewest environmental impacts, as required by CEQA.
- **Comment:** EDH APAC acknowledges that the No Project/No Development Alternative would avoid all environmental impacts. However, we also recognize that this alternative would not achieve any of the project's objectives, such as providing new housing and creating a connected community.

G-114

Alternative 2: Zoning Consistent Alternative (R&D)

- **Concern:** This alternative would develop the site with over 2 million square feet of warehouse and office uses, consistent with the site's existing zoning. The EIR's analysis for this alternative is highly critical, finding that it would likely have greater or similar impacts to the proposed project in many areas (aesthetics, air quality, noise, wildfire). Due to the recent attempts at “shoe-horning” projects that the community believes are not consistent with the R&D zone, such as large fulfillment warehouses, the community has expressed the desire for less impactful projects on the proposed CVSP site.
- **Comment:**EDH APAC agrees with the EIR's analysis that the Zoning Consistent Alternative is an inferior option. The EIR correctly concludes that this alternative would have greater or similar impacts on aesthetics, air quality, noise, and wildfire risk due to the nature of warehouse and office uses and associated truck traffic.

G-115

Alternative 3: Reduced Impact Alternative (RIA)

- **Comment:** EDH APAC finds that the EIR's analysis of the **Reduced Impact Alternative (RIA)** is compelling and provides a clear path forward for the Creekside Village Specific Plan. The EIR's finding that the RIA is the environmentally superior alternative is well-supported by the evidence. This alternative directly addresses the most significant environmental impacts identified for the proposed project by preserving Tribal Cultural Resources and reducing operational air pollutant emissions below the level of significance. This achievement is a testament to a successful and collaborative planning process.
- **Concern:** The EIR still finds a significant and unavoidable impact on aesthetics even with the RIA.
- **Comment:** While the EIR correctly finds that the RIA will still have a significant and unavoidable impact on aesthetics, we acknowledge that any development of this site would result in this finding. We believe the RIA's preservation of more open space and its lower overall density will help to minimize this visual impact, making it a more desirable project from an aesthetic standpoint.

G-116

G-117

3. Final Conclusion and Recommendation

Comment: The Alternatives section of the Draft EIR is a critical tool for decision-making. Its findings provide overwhelming support for the **Reduced Impact Alternative (RIA)** as the environmentally superior choice. The RIA is the more responsible and sustainable option, as it avoids the most serious environmental impacts of the proposed project, directly addresses the concerns of tribal governments and the community, and still meets all of the project's core objectives. EDH APAC strongly urges the County to consider the RIA as the final project.

G-118

EDH APAC appreciates the opportunity to discuss, review, and provide findings on proposed development projects in El Dorado Hills.

Respectfully,

John Davey
Chair

El Dorado Hills Area Planning Advisory Committee
"Non-Partisan Volunteers Planning Our Future Since 1981"

Comment Letter H

From: Christine .
To: creeksidevillagesp@edcgov.us
Subject: Attn Cameron Welch- public comment
Date: Thursday, July 10, 2025 6:58:41 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Mr. Welch - I am a ten-year resident of the Blackstone Development and frequently enter my residence off Latrobe and Royal Oaks Drive. I am not opposed to growth and development if it's done appropriately and accommodates the needs of the community. As you know, Latrobe Rd is frequently traveled and at high rates of speed. This road is already an issue during peak traffic times and the development of 763-918 residential units would heavily impact this road. This is a safety issue not only for the high rate of speed traveled, but more importantly, because it is the only way in and out of the area. Adding more structures increases the risk of fire, or during a natural disaster, the probability of escape has greatly been reduced. The DOT needs to modify Latrobe, and the lanes need to be increased. There is no way around this. As a former member of the traffic and safety committee, this will be one of the most significant roadblocks in addition to the resistance of growth. H-1 H-2

Blackstone is a community full of young families and children. There are several school bus routes that travel in and out of Latrobe throughout the day and as a mother of 3 attending 3 different schools I do know this will affect the bus routes and this will have a huge impact whether or not it's 55+. Please consider the traffic first and foremost. H-3

Respectfully submitted,
Christine Morris

Appendix B
Conceptual Park Programming



LEGEND

A. ON SITE PARKING (21 Regular Stalls, 2 ADA Stalls)
B. MULTI-PURPOSE AC, CLASS I TRAIL
C. CONCRETE PEDESTRIAN FLATWORK
D. SHADE SHELTER WITH BBQ AND TABLES
E. DRINKING FOUNTAIN
F. TOT LOT WITH SAFETY SURFACING
G. SWING SET WITH SAFETY SURFACING
H. MULTI-PURPOSE TURF FIELD (Soccer 330' x 195')
I. PASSIVE TURF AREA
J. PICKLEBALL COURTS (2) W/ SEAT WALL AND FENCING
K. FULL COURT BASKETBALL
L. BOCCE COURT (2)
M. SMALL BREED DOG PARK WITH TURF, DG, & FENCING
N. DRINKING FOUNTAIN, TRASH, & DOGIPOT
O. SCREEN WALL WITH MONUMENTATION & SHADE
P. SHADE STRUCTURE WITH BENCH SEATING
Q. MOUNDED BUFFER ADJACENT TO LATROBE RD.
R. SHRUB AND GROUNDCOVER AREA
S. SHADE TREE GROVE

LEGEND

A. ON SITE PARKING FOR PARK (17 Regular Stalls, 2 ADA Stalls)
B. TRAILHEAD STREET PARKING (7 Regular Stalls)
C. MULTI-PURPOSE AC, CLASS I TRAIL
D. CONCRETE PEDESTRIAN FLATWORK
E. OPEN SPACE W/ EXISTING TREES TO REMAIN
F. VISTA POINT WITH SEAT WALLS AND BENCH
G. RETAINING WALLS AS NEEDED
H. LARGE BREED DOG PARK W/ TURF, DG, & FENCING
I. SEAT WALLS, BENCH, TABLE SEATING IN DG
J. DRINKING FOUNTAIN, TRASH, & DOGIPOT
K. SCREEN WALL WITH MONUMENTATION & SHADE
L. PICNIC TABLES
M. SHADE STRUCTURE WITH GAME TABLES
N. BENCH SEATING
O. SHRUB AND GROUDCOVER
P. SCREENING TREES AND SHRUBS ALONG LATROBE RD.



Appendix C

Destinations Project Active Adult
Trip Generation Study

T.KEAR
TRANSPORTATION PLANNING
& MANAGEMENT, INC.

Memorandum

TO: Sean MacDiarmid, Lennar Corporation

FROM: Tom Kear, PhD, PE

Date: November 1, 2016

RE: Destinations Project Active Adult Trip Generation Study

Introduction and Findings

The purpose of this study is to compare local trip generation rates for Destinations at Vineyard Point Village (Destinations) to those published by the Institute of Transportation Engineers (ITE) for ITE land use #251 "senior adult housing – detached". ITE land use 251 is used to characterize the trip-making characteristics of age restricted housing such as Destinations. Trip generation is also compared to that of ITE land use 210 "single-family detached housing" which would have been used in the North Vineyard Station Specific Plan (NVSSP) Draft Environmental Impact Report.

One of the first requirements of any trip generation study is to establish a hypotheses identifying why national data is not appropriate. Analysts often perceive that their area is unique, but it has been the experience within the traffic engineering community that differences in trip generation between sites often have more to do with the site context and setting than with geography. There are reasons to believe that the national data for ITE land use #251 may not be ideal for the Sacramento Region. The published ITE rates are based on an a very small sample of ten studies; and eight out of those ten of the studies were conducted in snow-belt states.

When developing custom trip generation rates, typically a minimum of 3 to 5 locations are studied[1]. For this initial study, TKTPM performed a preliminary assessment based on just one location to evaluate if local trip generation rates appear to differ from the national rates.

Study Location:

Traffic counts were conducted for Destinations at Vineyard Point Village (Destinations). Destinations is a master planned, gated, solar community located in Sacramento County, California, 13 miles from downtown Sacramento. The project is situated on the west side of Bradshaw Road, between Alder Creek Drive and Ballinger Drive. A site plan (**Figure 1**) and areal image (**Figure 2**) are attached.

Destinations includes 177[2] detached single family, age restricted, dwelling units with a density of about 8.6 dwelling units (DUs) per acre, plus a club house with an exercise room, entertainment

[1] ITE (2014) Trip Generation Handbook, 3rd. Edition, Washington DC.
[2] The site plan includes 178 residential lots, one of which remains as parking for the recreation center.

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areas, and pool, for the residents use. Homes are two and three bedroom designs with attached garages that sold in the low to mid two hundred-thousand-dollar price range.

Traffic for the Destinations community was originally analyzed as part of the North Vineyard Station Specific Plan (NVSSP) which was which adopted on November 4, 1998. The NVSSP assumed the area where Destinations is located would be developed as single family residential 4-7 DU/Ac (RD-7) and medium density residential 7-12 DU/Ac (RD-12). A lot map for Destinations (Known as the Village F) was incorporated into the Vineyard Point Amended Vesting Tentative Subdivision Map, Special Development Permit, Exception, and Affordable Housing Plan project approved by the County Board of Supervisors on February 26, 2007.

A use permit for the clubhouse and special development permit to modify setback requirements and to allow the project to be a gated community was approved by the Design Review Advisory Committee on November 11, 2010. The staff report for this action noted that the project was reviewed by the Sacramento County Department of Transportation (SacDOT), which indicated that due to a reduction in the number of lots proposed from the previously approved map, the number of new daily trips and number of new trips during the PM peak-hour would be reduced. Impacts related to access, circulation, and traffic from the Destinations project are considered less than significant.

Trip Generation

Traffic counts

TKTPM conducted directional traffic counts at the two driveways to the Destinations project (driveway access to Ballinger Drive and driveway access to Alder Creek Drive). An existing count was used for Bradshaw Road, which is necessary to identify the peak-hours of adjacent street traffic.

Traffic Counts are typically conducted mid-week (Tuesday-Thursday) during dry weather. Due to time constraints, driveway counts were conducted on: Monday October 24, 2016; Tuesday October 25, 2016, and Wednesday October 26, 2016. There was light precipitation on Monday evening and Tuesday morning. The Bradshaw Road count was conducted on Thursday March 17, 2016. The AM peak-hour of traffic on Bradshaw Road occurred from 7:15 to 8:15 AM, and the PM peak-hour occurred from 4:30 to 5:30 PM.

Table 1.Observed Trip Generation Rates at Destinations

	Range of Observed Driveway Trip Rates	Average of Observed Driveway Trip Rate
Daily Rate	2.62 - 3.1	2.91
AM Peak-Hour of Adjacent Street	0.15 - 0.2	0.17
AM Peak-Hour of Generator	0.21 - 0.27	0.24
PM Peak-Hour of Adjacent Street	0.21 - 0.27	0.24
PM Peak-Hour of Generator	0.27 - 0.32	0.29

ITE Land Use 251 Trip Generation

Senior adult housing consists of detached independent living developments including retirement communities, age-restricted housing and active adult communities. These developments may include amenities such as golf courses, swimming pools, 24-hour security, transportation and common recreational facilities. However, they lack centralized dining and on-site health facilities. Detached senior adult housing communities may or may not be gated. Residents in these communities are typically active (requiring little to no medical supervision). The percentage of retired residents varies by development.

According to the ITE Trip generation manual, caution should be used when applying trip rates for this land use as it may contain a wide variety of studies ranging from communities with very active, working residents to communities with older, retired residents. The sites were surveyed in the 1980s, the 1990s and the 2000s in California (one study), Florida (one study), New Hampshire (one study), New Jersey (four studies), Pennsylvania (two studies) and Canada (one study). The single study conducted in California was performed in Camarillo (Ventura County), more than 25 years ago.

Trip Rates published by ITE are shown in **Table 2**. The peak hour of the generator typically did not coincide with the peak hour of the adjacent street traffic. The AM peak-hour of the generator typically ranged from 7:00 AM to noon and the PM peak-hour of the generator typically ranged from 1:00 PM to 6:00 PM. Note that ITE publishes both an average trip rate, as well as an equation to estimate trip generation as a function of one of several characteristics of the development, typically the number of dwelling units when looking as residential projects. Both the average and equation based trip generation rates are reported in **Table 2**.

Table 2. ITE Land Use #251 "Senior Adult Housing – Detached" Trip Generation per Dwelling Unit

	Range of Trip Rates in ITE Trip Generation Manual	Standard Deviation	Average Trip Rate	Equation Trip Rate (for 177 DUs)
Daily Rate	2.90 - 5.70	2.04	3.68	4.44
AM Peak-Hour of Adjacent Street	0.13 - 0.84	0.09	0.22	0.34
AM Peak-Hour of Generator	0.21 - 0.90	0.13	0.29	0.36
PM Peak-Hour of Adjacent Street	0.17 - 0.95	0.11	0.27	0.39
PM Peak-Hour of Generator	0.20 - 1.01	0.19	0.34	0.48

ITE Land Use 210 Trip Generation

Single-family detached housing includes all single-family detached homes on individual lots. A typical site surveyed is a suburban subdivision.

The number of vehicles and residents had a high correlation with average weekday vehicle trip ends. The use of these variables was limited, however, because the number of vehicles and residents was often difficult to obtain or predict. The number of dwelling units was generally used as the independent variable of choice because it was usually readily available, easy to project and had a high correlation with average weekday vehicle trip ends.

The sites were surveyed between the late 1960s and the 2000s throughout the United States and Canada. Because data from a wide variety of units with different sizes, price ranges, locations and ages was included, there was a wide variation in trips generated within this category. Other factors, such as geographic location and type of adjacent and nearby development, may also have had an effect on the site trip generation.

Single-family detached units had the highest trip generation rate per dwelling unit of all residential uses because they were the largest units in size and had more residents and more vehicles per unit than other residential land uses; they were generally located farther away from shopping centers, employment areas and other trip attractors than other residential land uses; and they generally had fewer alternative modes of transportation available because they were typically not as concentrated as other residential land uses.

Trip rates published by ITE are shown in **Table 3**. The peak-hour of the generator typically coincided with the peak-hour of the adjacent street traffic. Both the average and equation based trip generation rates are reported in **Table 3**.

Table 3. ITE Land Use #210 "Single-Family Detached Housing" Trip Generation per Dwelling Unit

	Range of Trip Rates in ITE Trip Generation Manual	Standard Deviation	Average Trip Rate	Equation Trip Rate (for177 DUs)
Daily Rate	4.31 – 21.85	2.05	9.52	10.03
AM Peak-Hour of Adjacent Street	0.33 – 2.27	0.27	0.75	0.76
AM Peak-Hour of Generator	0.33 – 2.27	0.26	.77	0.77
PM Peak-Hour of Adjacent Street	0.42 – 2.98	0.31	1.00	0.99
PM Peak-Hour of Generator	0.42 – 2.98	0.30	1.02	0.88

Comparison of Observed Trip Rates to ITE Land Use 251 Trip Rates

Table 4 compares the observed trip rates at the Destinations community to those published for ITE Land Use (LU) #251 and LU #210. Observed trip rates were slightly lower (but relatively close to) the ITE #251 trip rates. Compared to ITE #210, observed trip rates were only 20% to 34% of the daily and peak-hour trip rates.

The relatively large standard deviations of the published ITE rates makes statistically significant differences impractical to consider between the Destinations traffic counts and those of ITE LU #251. Anecdotally, the observed Destinations data is very similar to published data for ITE U #251.

The difference between the observed Destinations trip rates and published trip rates for daily traffic and the peak-hours of adjacent street traffic from ITE LU 210 are statically significant at the 95% confidence level.

Table 4.Trip Rate Comparison of Destinations to ITE Land Use 251 per Dwelling Unit

	LU #251 Average Trip Rate	LU #251 Equation Trip Rate (for 177 DUs)	LU #210 Average Trip Rate	LU #210 Equation Trip Rate (for 177 DUs)	Average of Observed Driveway Trip Rate
Daily Rate	3.68	4.44	9.52	10.03	2.91
AM Peak-Hour of Adjacent Street	0.22	0.34	0.75	0.76	0.17
AM Peak-Hour of Generator	0.29	0.36	.77	0.77	0.24
PM Peak-Hour of Adjacent Street	0.27	0.39	1.00	0.99	0.24
PM Peak-Hour of Generator	0.34	0.48	1.02	0.88	0.29

Conclusions and Recommendations

The Destinations project was originally analyzed as single-family housing in the North Vineyard Station Specific Plan Draft Environmental Impact Report (DEIR), which would have assumed non-age restricted housing consistent with the Specific Plan. Actual daily and peak-hour trip generation from the project is considerably lower than the ITE LU #210 trip generation rates that would have been used in the DEIR:

- Daily trip generation from Destinations was observed to be about 30% of the ITE LU #210 daily rate.
- AM peak-hour trip generation from Destinations was observed to be about 23% of that of ITE LU #210 during the peak-hour of adjacent street traffic.
- PM peak-hour trip generation from Destinations was observed to be about 24% of that of ITE LU #210 during the peak-hour of adjacent street traffic.

These differences are statistically significant at the 95th percent confidence level.

Within the Sacramento Region ITE LU #251 “senior adult housing – detached” appears valid for application to age restricted communities with similar characteristics to the Destinations at Vineyard Point project. Observed trip generation appears to be about two-thirds of the published ITE LU #251 rates, however precipitation on Tuesday likely limited trip generation.

Attachments

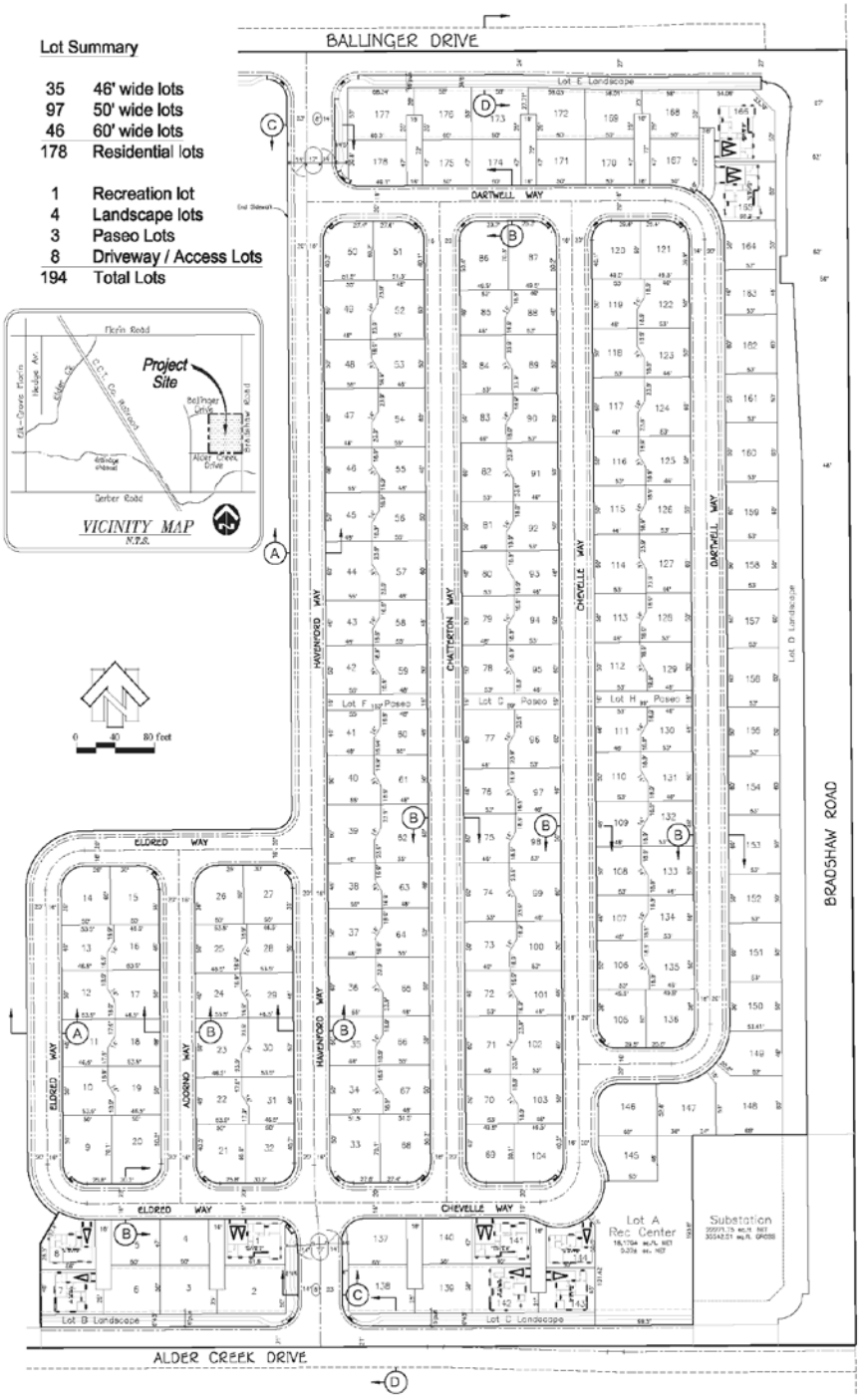


Figure 1. Site Plan for Destinations/Heritage Oaks Active Adult Community



Figure 2. Aerial View of Destinations/Heritage Oaks Active Adult Community

Prepared by NDS/ATD

VOLUME

Ballinger Dr & North Driveway

Day: Monday
Date: 10/24/2016

City: Sacramento
Project #: 16-07797-002

DAILY TOTALS	OUT	IN	Total
	118	126	244

AM Period	OUT		IN		TOTAL		PM Period	OUT		IN		TOTAL	
00:00	0		0		0		12:00	6		1		7	
00:15	0		0		0		12:15	0		1		1	
00:30	0		0		0		12:30	0		3		3	
00:45	0		0		0		12:45	5	11	4	9	9	20
01:00	0		0		0		13:00	1		3		4	
01:15	0		0		0		13:15	1		3		4	
01:30	0		0		0		13:30	0		2		2	
01:45	0		0		0		13:45	2	4	1	9	3	13
02:00	0		0		0		14:00	2		1		3	
02:15	0		0		0		14:15	6		3		9	
02:30	0		0		0		14:30	1		1		2	
02:45	0		0		0		14:45	1	10	1	6	2	16
03:00	1		0		1		15:00	0		3		3	
03:15	0		0		0		15:15	1		1		2	
03:30	1		0		1		15:30	2		6		8	
03:45	0	2	0		0	2	15:45	2	5	5	15	7	20
04:00	0		0		0		16:00	1		5		6	
04:15	0		0		0		16:15	1		3		4	
04:30	1		1		2		16:30	0		3		3	
04:45	0	1	0	1	0	2	16:45	1	3	5	16	6	19
05:00	0		0		0		17:00	1		5		6	
05:15	1		0		1		17:15	2		4		6	
05:30	1		0		1		17:30	1		3		4	
05:45	3	5	0		3	5	17:45	1	5	2	14	3	19
06:00	3		0		3		18:00	0		8		8	
06:15	2		0		2		18:15	0		4		4	
06:30	0		0		0		18:30	0		5		5	
06:45	1	6	0		1	6	18:45	3	3	3	20	6	23
07:00	6		2		8		19:00	1		2		3	
07:15	6		0		6		19:15	3		3		6	
07:30	1		0		1		19:30	0		2		2	
07:45	3	16	0	2	3	18	19:45	1	5	1	8	2	13
08:00	2		1		3		20:00	0		0		0	
08:15	2		0		2		20:15	0		1		1	
08:30	5		0		5		20:30	0		0		0	
08:45	1	10	0	1	1	11	20:45	0		1	2	1	2
09:00	1		2		3		21:00	0		1		1	
09:15	4		1		5		21:15	2		1		3	
09:30	4		2		6		21:30	0		0		0	
09:45	3	12	1	6	4	18	21:45	1	3	1	3	2	6
10:00	4		3		7		22:00	0		0		0	
10:15	2		1		3		22:15	0		0		0	
10:30	5		2		7		22:30	1		0		1	
10:45	2	13	0	6	2	19	22:45	0	1	0		0	1
11:00	1		3		4		23:00	0		0		0	
11:15	1		1		2		23:15	0		0		0	
11:30	0		0		0		23:30	0		1		1	
11:45	1	3	3	7	4	10	23:45	0		0	1	0	1
TOTALS		68		23		91	TOTALS		50		103		153
SPLIT %		74.7%		25.3%		37.3%	SPLIT %		32.7%		67.3%		62.7%

DAILY TOTALS	OUT	IN	Total
	118	126	244

AM Peak Hour	07:00	11:45			09:15	PM Peak Hour	12:00	18:00			15:30
AM Pk Volume	16	8			22	PM Pk Volume	11	20			25
Pk Hr Factor	0.667	0.667			0.786	Pk Hr Factor	0.458	0.625			0.781
7 - 9 Volume	26	3	0	0	29	4 - 6 Volume	8	30	0	0	38
7 - 9 Peak Hour	07:00	07:00			07:00	4 - 6 Peak Hour	16:45	16:30			16:45
7 - 9 Pk Volume	16	2	0	0	18	4 - 6 Pk Volume	5	17	0	0	22
Pk Hr Factor	0.667	0.250	0.000	0.000	0.563	Pk Hr Factor	0.625	0.850	0.000	0.000	0.917

Prepared by NDS/ATD

VOLUME

Alder Creek Dr & South Driveway

Day: Monday
Date: 10/24/2016

City: Sacramento
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	136	152	288

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		4		6	
00:15	0		0		0		12:15	4		3		7	
00:30	0		0		0		12:30	4		4		8	
00:45	0		0		0		12:45	4	14	2	13	6	27
01:00	0		0		0		13:00	5		1		6	
01:15	0		0		0		13:15	4		4		8	
01:30	0		0		0		13:30	1		1		2	
01:45	0		0		0		13:45	1	11	0	6	1	17
02:00	0		0		0		14:00	2		5		7	
02:15	0		0		0		14:15	2		0		2	
02:30	0		0		0		14:30	2		3		5	
02:45	0		0		0		14:45	2	8	2	10	4	18
03:00	1		1		2		15:00	1		1		2	
03:15	0		0		0		15:15	5		0		5	
03:30	0		0		0		15:30	4		4		8	
03:45	0	1	0	1	0	2	15:45	4	14	2	7	6	21
04:00	0		0		0		16:00	3		0		3	
04:15	0		0		0		16:15	6		2		8	
04:30	0		0		0		16:30	4		0		4	
04:45	0		0		0		16:45	2	15	3	5	5	20
05:00	0		1		1		17:00	5		3		8	
05:15	0		0		0		17:15	5		1		6	
05:30	0		0		0		17:30	3		4		7	
05:45	0		0	1	0	1	17:45	2	15	1	9	3	24
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06:15	0		3		3		18:15	5		1		6	
06:30	1		3		4		18:30	2		1		3	
06:45	0	1	4	13	4	14	18:45	1	8	3	7	4	15
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08:15	1		2		3		20:15	1		0		1	
08:30	1		6		7		20:30	1		1		2	
08:45	4	6	3	12	7	18	20:45	2	5	0	1	2	6
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09:15	2		4		6		21:15	1		0		1	
09:30	0		8		8		21:30	1		0		1	
09:45	3	5	4	16	7	21	21:45	0	3	0	1	0	4
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10:15	2		4		6		22:15	2		0		2	
10:30	3		1		4		22:30	0		1		1	
10:45	2	9	5	12	7	21	22:45	0	2	0	1	0	3
11:00	3		3		6		23:00	0		0		0	
11:15	2		7		9		23:15	0		0		0	
11:30	2		3		5		23:30	0		0		0	
11:45	2	9	3	16	5	25	23:45	0		0		0	
TOTALS		33		86		**119**	**TOTALS**		103		66		**169**
SPLIT %		27.7%		72.3%		**41.3%**	**SPLIT %**		60.9%		39.1%		**58.7%**

DAILY TOTALS	IN	OUT	Total
	136	152	288

AM Peak Hour	11:45	09:15			**10:45**	**PM Peak Hour**	12:15	12:00			**12:30**
AM Pk Volume	12	18			**27**	**PM Pk Volume**	17	13			**28**
Pk Hr Factor	0.750	0.563			**0.750**	**Pk Hr Factor**	0.850	0.813			**0.875**
7 - 9 Volume	8	27	0	0	**35**	**4 - 6 Volume**	30	14	0	0	**44**
7 - 9 Peak Hour	08:00	07:00			**08:00**	**4 - 6 Peak Hour**	16:15	16:45			**16:45**
7 - 9 Pk Volume	6	15	0	0	**18**	**4 - 6 Pk Volume**	17	11	0	0	**26**
Pk Hr Factor	0.375	0.750	0.000	0.000	**0.643**	**Pk Hr Factor**	0.708	0.688	0.000	0.000	**0.813**

Prepared by NDS/ATD

VOLUME

Ballinger Dr & North Driveway

Day: Tuesday
Date: 10/25/2016

City: Sacramento
Project #: 16-07797-002

DAILY TOTALS	OUT	IN	Total
	94	93	187

AM Period	OUT		IN		TOTAL		PM Period	OUT		IN		TOTAL	
00:00	0		0		0		12:00	1		3		4	
00:15	0		0		0		12:15	3		1		4	
00:30	0		0		0		12:30	1		3		4	
00:45	0		0		0		12:45	3	8	3	10	6	18
01:00	0		0		0		13:00	1		3		4	
01:15	0		0		0		13:15	0		1		1	
01:30	0		0		0		13:30	4		2		6	
01:45	0		0		0		13:45	1	6	0	6	1	12
02:00	0		0		0		14:00	1		4		5	
02:15	0		0		0		14:15	2		2		4	
02:30	0		0		0		14:30	1		1		2	
02:45	0		0		0		14:45	0	4	0	7	0	11
03:00	0		0		0		15:00	1		2		3	
03:15	0		0		0		15:15	0		1		1	
03:30	0		0		0		15:30	1		2		3	
03:45	1	1	0		1	1	15:45	0	2	2	7	2	9
04:00	0		0		0		16:00	1		2		3	
04:15	0		0		0		16:15	3		1		4	
04:30	1		0		1		16:30	1		7		8	
04:45	0	1	0		0	1	16:45	1	6	3	13	4	19
05:00	1		0		1		17:00	0		2		2	
05:15	1		0		1		17:15	0		2		2	
05:30	0		0		0		17:30	1		10		11	
05:45	1	3	0		1	3	17:45	1	2	1	15	2	17
06:00	2		0		2		18:00	1		5		6	
06:15	3		0		3		18:15	2		1		3	
06:30	4		1		5		18:30	0		1		1	
06:45	3	12	0	1	3	13	18:45	0	3	0	7	0	10
07:00	2		1		3		19:00	1		1		2	
07:15	5		0		5		19:15	0		0		0	
07:30	1		0		1		19:30	0		2		2	
07:45	1	9	0	1	1	10	19:45	0	1	0	3	0	4
08:00	4		2		6		20:00	0		0		0	
08:15	1		1		2		20:15	0		2		2	
08:30	2		0		2		20:30	0		0		0	
08:45	5	12	0	3	5	15	20:45	0		2	4	2	4
09:00	7		2		9		21:00	0		1		1	
09:15	0		0		0		21:15	0		1		1	
09:30	5		1		6		21:30	0		1		1	
09:45	1	13	0	3	1	16	21:45	0		0	3	0	3
10:00	1		0		1		22:00	1		0		1	
10:15	0		2		2		22:15	0		0		0	
10:30	3		4		7		22:30	0		0		0	
10:45	4	8	1	7	5	15	22:45	1	2	1	1	2	3
11:00	0		0		0		23:00	0		0		0	
11:15	1		0		1		23:15	0		0		0	
11:30	0		0		0		23:30	0		0		0	
11:45	0	1	2	2	2	3	23:45	0		0		0	
TOTALS		60		17		**77**	**TOTALS**		34		76		**110**
SPLIT %		77.9%		22.1%		**41.2%**	**SPLIT %**		30.9%		69.1%		**58.8%**

DAILY TOTALS	OUT	IN	Total
	94	93	187

AM Peak Hour	08:45	11:45			**08:45**	**PM Peak Hour**	12:00	17:15			**17:30**
AM Pk Volume	17	9			**20**	**PM Pk Volume**	8	18			**22**
Pk Hr Factor	0.607	0.750			**0.556**	**Pk Hr Factor**	0.667	0.450			**0.500**
7 - 9 Volume	21	4	0	0	**25**	**4 - 6 Volume**	8	28	0	0	**36**
7 - 9 Peak Hour	08:00	07:30			**08:00**	**4 - 6 Peak Hour**	16:00	16:45			**16:00**
7 - 9 Pk Volume	12	3	0	0	**15**	**4 - 6 Pk Volume**	6	17	0	0	**19**
Pk Hr Factor	0.600	0.375	0.000	0.000	**0.625**	**Pk Hr Factor**	0.500	0.425	0.000	0.000	**0.594**

Prepared by NDS/ATD

VOLUME

Alder Creek Dr & South Driveway

Day: Tuesday
Date: 10/25/2016

City: Sacramento
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	137	139	276

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		2		4	
00:15	0		0		0		12:15	3		2		5	
00:30	0		0		0		12:30	1		3		4	
00:45	0		0		0		12:45	1	7	2	9	3	16
01:00	0		0		0		13:00	2		3		5	
01:15	0		0		0		13:15	2		4		6	
01:30	0		0		0		13:30	4		5		9	
01:45	0		0		0		13:45	2	10	2	14	4	24
02:00	0		0		0		14:00	0		6		6	
02:15	0		0		0		14:15	3		3		6	
02:30	0		0		0		14:30	3		0		3	
02:45	1	1	1	1	2	2	14:45	0	6	2	11	2	17
03:00	0		0		0		15:00	6		1		7	
03:15	0		0		0		15:15	4		2		6	
03:30	1		0		1		15:30	1		1		2	
03:45	0	1	1	1	1	2	15:45	4	15	2	6	6	21
04:00	0		0		0		16:00	3		1		4	
04:15	0		0		0		16:15	2		0		2	
04:30	0		0		0		16:30	5		5		10	
04:45	0		0		0		16:45	5	15	3	9	8	24
05:00	0		1		1		17:00	5		0		5	
05:15	0		0		0		17:15	5		4		9	
05:30	0		0		0		17:30	2		2		4	
05:45	0		0	1	0	1	17:45	6	18	4	10	10	28
06:00	0		2		2		18:00	2		1		3	
06:15	0		5		5		18:15	1		2		3	
06:30	0		6		6		18:30	1		2		3	
06:45	1	1	1	14	2	15	18:45	3	7	1	6	4	13
07:00	2		7		9		19:00	2		0		2	
07:15	1		4		5		19:15	1		1		2	
07:30	1		3		4		19:30	1		0		1	
07:45	0	4	4	18	4	22	19:45	2	6	0	1	2	7
08:00	0		1		1		20:00	0		0		0	
08:15	1		3		4		20:15	4		0		4	
08:30	1		1		2		20:30	3		1		4	
08:45	0	2	5	10	5	12	20:45	4	11	0	1	4	12
09:00	1		2		3		21:00	0		0		0	
09:15	1		4		5		21:15	0		0		0	
09:30	0		2		2		21:30	1		0		1	
09:45	3	5	2	10	5	15	21:45	1	2	0		1	2
10:00	2		3		5		22:00	1		0		1	
10:15	3		2		5		22:15	2		1		3	
10:30	4		3		7		22:30	0		0		0	
10:45	1	10	1	9	2	19	22:45	0	3	0	1	0	4
11:00	5		3		8		23:00	0		0		0	
11:15	1		0		1		23:15	0		0		0	
11:30	7		2		9		23:30	0		0		0	
11:45	0	13	2	7	2	20	23:45	0		0		0	
TOTALS		37		71		**108**	**TOTALS**		100		68		**168**
SPLIT %		34.3%		65.7%		**39.1%**	**SPLIT %**		59.5%		40.5%		**60.9%**

DAILY TOTALS	IN	OUT	Total
	137	139	276

AM Peak Hour	10:45	06:15			**06:15**	**PM Peak Hour**	16:30	13:15			**16:30**
AM Pk Volume	14	19			**22**	**PM Pk Volume**	20	17			**32**
Pk Hr Factor	0.500	0.679			**0.611**	**Pk Hr Factor**	1.000	0.708			**0.800**
7 - 9 Volume	6	28	0	0	**34**	**4 - 6 Volume**	33	19	0	0	**52**
7 - 9 Peak Hour	07:00	07:00			**07:00**	**4 - 6 Peak Hour**	16:30	16:30			**16:30**
7 - 9 Pk Volume	4	18	0	0	**22**	**4 - 6 Pk Volume**	20	12	0	0	**32**
Pk Hr Factor	0.500	0.643	0.000	0.000	**0.611**	**Pk Hr Factor**	1.000	0.600	0.000	0.000	**0.800**

Prepared by NDS/ATD

VOLUME

North Dwy Ballinger Dr

Day: Wednesday
Date: 10/26/2016

City: Elk Grove
Project #: 16-07797-002

DAILY TOTALS	IN	OUT	Total
	109	101	210

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	4		0		4	
00:15	0		0		0		12:15	3		1		4	
00:30	0		0		0		12:30	4		5		9	
00:45	0		0		0		12:45	1	12	3	9	4	21
01:00	0		0		0		13:00	3		2		5	
01:15	0		0		0		13:15	1		0		1	
01:30	0		0		0		13:30	3		1		4	
01:45	0		0		0		13:45	0	7	2	5	2	12
02:00	1		0		1		14:00	1		2		3	
02:15	0		0		0		14:15	2		0		2	
02:30	0		0		0		14:30	0		3		3	
02:45	0	1	0		0	1	14:45	1	4	0	5	1	9
03:00	0		0		0		15:00	0		4		4	
03:15	0		0		0		15:15	3		0		3	
03:30	0		0		0		15:30	1		1		2	
03:45	0		0		0		15:45	3	7	2	7	5	14
04:00	0		0		0		16:00	2		1		3	
04:15	0		0		0		16:15	7		0		7	
04:30	0		1		1		16:30	3		1		4	
04:45	0		1	2	1	2	16:45	1	13	1	3	2	16
05:00	0		1		1		17:00	3		1		4	
05:15	0		0		0		17:15	3		1		4	
05:30	1		2		3		17:30	3		0		3	
05:45	2	3	1	4	3	7	17:45	1	10	1	3	2	13
06:00	0		2		2		18:00	2		1		3	
06:15	0		1		1		18:15	5		2		7	
06:30	1		3		4		18:30	3		0		3	
06:45	0	1	2	8	2	9	18:45	1	11	2	5	3	16
07:00	1		7		8		19:00	2		2		4	
07:15	0		4		4		19:15	2		0		2	
07:30	0		4		4		19:30	0		0		0	
07:45	0	1	3	18	3	19	19:45	2	6	0	2	2	8
08:00	0		3		3		20:00	3		1		4	
08:15	1		3		4		20:15	3		0		3	
08:30	2		1		3		20:30	0		0		0	
08:45	1	4	4	11	5	15	20:45	1	7	0	1	1	8
09:00	2		2		4		21:00	4		0		4	
09:15	1		1		2		21:15	0		0		0	
09:30	1		1		2		21:30	0		0		0	
09:45	0	4	3	7	3	11	21:45	0	4	1	1	1	5
10:00	1		0		1		22:00	2		0		2	
10:15	0		0		0		22:15	0		0		0	
10:30	1		1		2		22:30	0		1		1	
10:45	3	5	2	3	5	8	22:45	1	3	1	2	2	5
11:00	0		1		1		23:00	0		0		0	
11:15	1		1		2		23:15	1		0		1	
11:30	1		1		2		23:30	1		0		1	
11:45	1	3	2	5	3	8	23:45	1	3	0		1	3
TOTALS		22		58		80	TOTALS		87		43		130
SPLIT %		27.5%		72.5%		38.1%	SPLIT %		66.9%		33.1%		61.9%

DAILY TOTALS	IN	OUT	Total
	109	101	210

AM Peak Hour	11:45	07:00			11:45	PM Peak Hour	15:45	12:15			12:15
AM Pk Volume	12	18			20	PM Pk Volume	15	11			22
Pk Hr Factor	0.750	0.643			0.556	Pk Hr Factor	0.536	0.550			0.611
7 - 9 Volume	5	29	0	0	34	4 - 6 Volume	23	6	0	0	29
7 - 9 Peak Hour	08:00	07:00			07:00	4 - 6 Peak Hour	16:15	16:30			16:15
7 - 9 Pk Volume	4	18	0	0	19	4 - 6 Pk Volume	14	4	0	0	17
Pk Hr Factor	0.500	0.643	0.000	0.000	0.594	Pk Hr Factor	0.500	1.000	0.000	0.000	0.607

Prepared by NDS/ATD

VOLUME

South Dwy Alder Creek Dr

Day: Wednesday
Date: 10/26/2016

City: Elk Grove
Project #: 16-07797-001

DAILY TOTALS	IN	OUT	Total
	168	171	339

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
00:00	0		0		0		12:00	2		1		3	
00:15	0		0		0		12:15	6		2		8	
00:30	0		0		0		12:30	4		4		8	
00:45	0		0		0		12:45	2	14	7	14	9	28
01:00	0		0		0		13:00	2		2		4	
01:15	0		0		0		13:15	4		2		6	
01:30	0		1		1		13:30	7		5		12	
01:45	0		0	1	0	1	13:45	1	14	2	11	3	25
02:00	0		0		0		14:00	7		7		14	
02:15	1		1		2		14:15	2		4		6	
02:30	1		1		2		14:30	7		7		14	
02:45	0	2	0	2	0	4	14:45	4	20	2	20	6	40
03:00	0		0		0		15:00	4		2		6	
03:15	0		0		0		15:15	7		4		11	
03:30	0		0		0		15:30	3		2		5	
03:45	0		0		0		15:45	4	18	5	13	9	31
04:00	0		0		0		16:00	7		3		10	
04:15	0		0		0		16:15	8		3		11	
04:30	0		0		0		16:30	4		3		7	
04:45	0		1	1	1	1	16:45	4	23	1	10	5	33
05:00	0		1		1		17:00	2		3		5	
05:15	0		0		0		17:15	4		2		6	
05:30	0		0		0		17:30	5		2		7	
05:45	0		0	1	0	1	17:45	3	14	0	7	3	21
06:00	0		1		1		18:00	2		0		2	
06:15	0		3		3		18:15	5		2		7	
06:30	0		3		3		18:30	4		2		6	
06:45	1	1	1	8	2	9	18:45	3	14	3	7	6	21
07:00	1		6		7		19:00	5		1		6	
07:15	1		5		6		19:15	2		1		3	
07:30	1		4		5		19:30	1		0		1	
07:45	0	3	4	19	4	22	19:45	1	9	1	3	2	12
08:00	2		4		6		20:00	1		1		2	
08:15	1		4		5		20:15	3		0		3	
08:30	0		2		2		20:30	2		1		3	
08:45	0	3	2	12	2	15	20:45	2	8	0	2	2	10
09:00	1		6		7		21:00	0		1		1	
09:15	1		4		5		21:15	1		0		1	
09:30	0		2		2		21:30	2		0		2	
09:45	1	3	6	18	7	21	21:45	0	3	0	1	0	4
10:00	3		3		6		22:00	0		0		0	
10:15	1		1		2		22:15	0		1		1	
10:30	2		3		5		22:30	1		0		1	
10:45	3	9	2	9	5	18	22:45	0	1	0	1	0	2
11:00	1		2		3		23:00	0		0		0	
11:15	1		2		3		23:15	0		0		0	
11:30	3		2		5		23:30	2		0		2	
11:45	2	7	5	11	7	18	23:45	0	2	0		0	2
TOTALS		28		82		**110**	**TOTALS**		140		89		**229**
SPLIT %		25.5%		74.5%		**32.4%**	**SPLIT %**		61.1%		38.9%		**67.6%**

DAILY TOTALS	IN	OUT	Total
	168	171	339

AM Peak Hour	11:45	07:00			**11:45**	**PM Peak Hour**	15:45	13:45			**14:00**
AM Pk Volume	14	19			**26**	**PM Pk Volume**	23	20			**40**
Pk Hr Factor	0.583	0.792			**0.813**	**Pk Hr Factor**	0.719	0.714			**0.714**
7 - 9 Volume	6	31	0	0	**37**	**4 - 6 Volume**	37	17	0	0	**54**
7 - 9 Peak Hour	07:15	07:00			**07:00**	**4 - 6 Peak Hour**	16:00	16:00			**16:00**
7 - 9 Pk Volume	4	19	0	0	**22**	**4 - 6 Pk Volume**	23	10	0	0	**33**
Pk Hr Factor	0.500	0.792	0.000	0.000	**0.786**	**Pk Hr Factor**	0.719	0.833	0.000	0.000	**0.750**

Prepared by NDS/ATD

VOLUME

Bradshaw Road between Gerber Road and Vintage Park Drive

Day: Thursday
Date: 3/17/2016

City: Sacramento
Project #: 16-7180-001

6750-01

DAILY TOTALS	NB	SB	EB	WB	Total
	11,389	11,475	0	0	22,864

AM Period	NB		SB		EB	WB	TOTAL		PM Period	NB		SB		EB	WB	TOTAL	
00:00	10		32		0	0	42		12:00	102		105		0	0	207	
00:15	7		27		0	0	34		12:15	97		128		0	0	225	
00:30	12		12		0	0	24		12:30	104		90		0	0	194	
00:45	6	35	13	84	0	0	19	119	12:45	113	416	121	444	0	0	234	860
01:00	4		8		0	0	12		13:00	120		109		0	0	229	
01:15	10		12		0	0	22		13:15	126		120		0	0	246	
01:30	7		12		0	0	19		13:30	124		156		0	0	280	
01:45	9	30	11	43	0	0	20	73	13:45	134	504	137	522	0	0	271	1026
02:00	3		6		0	0	9		14:00	126		181		0	0	307	
02:15	4		9		0	0	13		14:15	152		184		0	0	336	
02:30	6		8		0	0	14		14:30	162		191		0	0	353	
02:45	8	21	6	29	0	0	14	50	14:45	124	564	268	824	0	0	392	1388
03:00	9		9		0	0	18		15:00	168		256		0	0	424	
03:15	18		10		0	0	28		15:15	172		264		0	0	436	
03:30	13		5		0	0	18		15:30	181		275		0	0	456	
03:45	10	50	8	32	0	0	18	82	15:45	176	697	353	1148	0	0	529	1845
04:00	18		8		0	0	26		16:00	162		378		0	0	540	
04:15	32		8		0	0	40		16:15	164		377		0	0	541	
04:30	43		5		0	0	48		16:30	183		407		0	0	590	
04:45	52	145	10	31	0	0	62	176	16:45	158	667	399	1561	0	0	557	2228
05:00	70		18		0	0	88		17:00	157		405		0	0	562	
05:15	102		14		0	0	116		17:15	137		452		0	0	589	
05:30	200		27		0	0	227		17:30	139		405		0	0	544	
05:45	192	564	31	90	0	0	223	654	17:45	138	571	333	1595	0	0	471	2166
06:00	192		60		0	0	252		18:00	115		272		0	0	387	
06:15	249		70		0	0	319		18:15	136		273		0	0	409	
06:30	357		91		0	0	448		18:30	113		243		0	0	356	
06:45	362	1160	107	328	0	0	469	1488	18:45	115	479	159	947	0	0	274	1426
07:00	384		113		0	0	497		19:00	83		137		0	0	220	
07:15	395		160		0	0	555		19:15	74		145		0	0	219	
07:30	471		177		0	0	648		19:30	57		123		0	0	180	
07:45	439	1689	138	588	0	0	577	2277	19:45	83	297	123	528	0	0	206	825
08:00	392		148		0	0	540		20:00	81		95		0	0	176	
08:15	338		154		0	0	492		20:15	54		100		0	0	154	
08:30	292		121		0	0	413		20:30	60		107		0	0	167	
08:45	253	1275	104	527	0	0	357	1802	20:45	58	253	88	390	0	0	146	643
09:00	224		80		0	0	304		21:00	64		92		0	0	156	
09:15	153		77		0	0	230		21:15	63		88		0	0	151	
09:30	154		69		0	0	223		21:30	54		93		0	0	147	
09:45	120	651	92	318	0	0	212	969	21:45	43	224	81	354	0	0	124	578
10:00	116		86		0	0	202		22:00	40		67		0	0	107	
10:15	113		81		0	0	194		22:15	41		54		0	0	95	
10:30	109		86		0	0	195		22:30	30		57		0	0	87	
10:45	108	446	90	343	0	0	198	789	22:45	29	140	45	223	0	0	74	363
11:00	97		93		0	0	190		23:00	33		40		0	0	73	
11:15	94		99		0	0	193		23:15	32		37		0	0	69	
11:30	109		80		0	0	189		23:30	20		36		0	0	56	
11:45	107	407	93	365	0	0	200	772	23:45	19	104	48	161	0	0	67	265
TOTALS		6473		2778				9251	TOTALS		4916		8697				13613
SPLIT %		70.0%		30.0%				40.5%	SPLIT %		36.1%		63.9%				59.5%

DAILY TOTALS	NB	SB	EB	WB	Total
	11,389	11,475	0	0	22,864

AM Peak Hour	07:15	07:15			07:15	PM Peak Hour	15:00	16:30			16:30
AM Pk Volume	1697	623			2320	PM Pk Volume	697	1663			2298
Pk Hr Factor	0.901	0.880			0.895	Pk Hr Factor	0.963	0.920			0.974
7 - 9 Volume	2964	1115	0	0	4079	4 - 6 Volume	1238	3156	0	0	4394
7 - 9 Peak Hour	07:15	07:15			07:15	4 - 6 Peak Hour	16:00	16:30			16:30
7 - 9 Pk Volume	1697	623	0	0	2320	4 - 6 Pk Volume	667	1663	0	0	2298
Pk Hr Factor	0.901	0.880	0.000	0.000	0.895	Pk Hr Factor	0.911	0.920	0.000	0.000	0.974

Appendix D

Strategic Area Project Health Screening Tool

Strategic Area Project Health Effects Tool

Strategic Area Location	II. Rancho Cordova	**<-- Step 1: Input the area**
NOx Emissions	90.9	**<-- Step 2: Input NOx emissions in lbs./day**
ROG Emissions	51.2	**<-- Step 3: Input ROG emissions in lbs./day**
PM25 Emissions	10.8	**<-- Step 4: Input PM2.5 emissions in lbs./day**

PM2.5 Health Endpoint	Age Range1	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	1.9	1.7	0.0093%	18419
Hospital Admissions, Asthma	0 - 64	0.12	0.11	0.0060%	1846
Hospital Admissions, All Respiratory	65 - 99	0.72	0.64	0.0033%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.40	0.37	0.0015%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.00015	0.00014	0.0037%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.013	0.013	0.0041%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.035	0.033	0.0044%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.056	0.053	0.0043%	1239
Acute Myocardial Infarction, Nonfatal	65 - 99	0.25	0.24	0.0047%	5052
Mortality					
Mortality, All Cause	30 - 99	4.7	4.3	0.0096%	44766

Ozone Health Endpoint	Age Range1	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year)[2,5]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2]	Percent of Background Health Incidences Across the 5-Air-District Region[3]	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.16	0.13	0.00065%	19644
Emergency Room Visits, Asthma	0 - 17	0.62	0.51	0.0087%	5859
Emergency Room Visits, Asthma	18 - 99	1.1	0.89	0.0071%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.10	0.085	0.00028%	30386

1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.

4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.

5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District.*

Sac Metro Air District Strategic Area Project Health Effects Tool, version 2, published September 2020

Appendix E

Reduced Impact Alternative Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

Introduction

The California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code Section 21081.6 and 14 CCR 15091[d] and 15097) require public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Reduced Impact Alternative (referred to herein as the "RIA," "preferred project," or "project") because the RIA is recommended for approval over the original proposed project, the Environmental Impact Report (EIR) identifies significant adverse impacts related to implementation of the RIA, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the RIA.

Purpose of the Mitigation Monitoring and Reporting Program

The MMRP contained herein has been prepared to ensure that all required mitigation measures are implemented and completed in a sufficient manner before and during project construction and operation. Mitigation measures would be implemented to avoid a potentially significant impact as identified in the EIR. The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by Section 15370 of the CEQA Guidelines as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The MMRP includes the mitigation measures from the Draft EIR applicable to the RIA, as modified by the Final EIR (see Chapter 2, Changes to the Draft Environmental Impact Report). Mitigation measures AQ-1, AQ-2, BIO-10, CUL-3, and TCR-6 from the EIR would not be applicable to the RIA and therefore are omitted from the MMRP.

Mitigation Monitoring and Reporting Program

Table 1 has been prepared to assist the County of El Dorado (County) and responsible parties in implementing and monitoring compliance with mitigation measures. The table identifies each mitigation measure; the impact the measure is designed to address, the action required for the measure to be implemented; the implementation schedule; and the monitoring agency.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.3-1. The RIA preferred project could have an adverse effect on candidate, sensitive, or special-status species.	**BIO-1: Rare Plant Survey.** If more than three years has elapsed since the last protocol-level rare plant survey in April 2022 (i.e., April 2025), a qualified botanist shall conduct a minimum of two plant surveys during the appropriate blooming period for potentially occurring special-status plant species prior to ground disturbance, in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 3/2018). The purpose of the survey shall be to delineate and flag populations of special-status plant species for avoidance. Special-status plant populations identified during the pre-construction survey shall be mapped using a hand-held submeter GPS unit and avoided where possible. The avoidance plans shall be prepared in coordination with CDFW. Plant individuals or populations plus a 10-foot buffer shall be temporarily fenced during construction activities with high-visibility fencing or prominently flagged. If complete avoidance of populations is infeasible, further measures, as described below, shall be necessary. If avoidance of special-status plant species is not feasible, a Plan shall be prepared by a qualified botanist prior to implementation. The Plan shall include, at a minimum: identification of occupied habitat to be preserved and removed, identification of on-site or off-site preservation, restoration, or enhancement locations, a replacement ratio and success standard of 1:1 for acreage impacts, a monitoring program, and adaptive management and remedial measures in the event that the performance standards are not achieved. The Plan may include a variety of methods, including propagation (including via seed) and off-site preservation, restoration, or enhancement. If take of a CESA-listed plant is required, then an Incidental Take Permit from CDFW will be necessary, and all impacts will be fully mitigated through implementation of avoidance, minimization, and compensatory mitigation. Compensation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of habitat suitable for the CESA-listed plant species in accordance with CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at an approved mitigation bank, purchasing credits from an approved in-lieu fee, and/or by implementing an onsite or offsite permittee responsible mitigation offset. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-1. If a pre-construction survey is required	During the blooming period for potentially occurring special-status plant species and prior to ground disturbance	Written documentation of survey results and compliance with BIO-1 shall be submitted to El Dorado County Planning and Building Department or El Dorado County Department of Transportation (for roadway construction) prior to ground disturbance Consult with CDFW if rare plant survey is positive

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	(per the circumstances described in Mitigation Measure BIO-1), the County Planning and Building Department shall verify the survey's completion within 7 days of any ground disturbing activities. If grading would occur for implementation of improvements and/or infrastructure through the County Department of Transportation (DOT), DOT shall verify the completion of survey prior any ground disturbing activities. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.		
	BIO-2: Environmental Awareness Training. Before any work occurs in the project site and at the beginning of each construction year, including site clearing, grading, and equipment staging, all construction personnel shall participate in an environmental awareness training provided by a qualified biologist regarding special-status species and sensitive habitats present in the project site. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describes and illustrates sensitive resources to be avoided during project construction. The environmental awareness handout shall be included with any grading permit plans being reviewed/to be reviewed by the County. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.	Prior to construction initiation and at the beginning of each construction year	Written documentation of compliance with BIO-2 shall be submitted to El Dorado County Planning and Building Department prior to start of construction
	BIO-3: Work Area Delineation and Fencing. Before any site clearing, grading or other ground-disturbing activity occurs within the project site, the project applicant shall ensure that temporary orange barrier fencing is installed around the project site adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fencing. The exact location of the fencing shall be determined by a qualified biologist coordinating with the resident construction contractor, with the goal of protecting sensitive biological habitat and water quality. The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) installed between the work area and environmentally sensitive habitat areas (i.e., waters of the U.S., special-status wildlife habitat, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in. Installation of the barrier fence shall occur under the supervision of a qualified biologist. The temporary orange barrier fencing shall also be installed in a manner that is consistent with applicable water quality requirements contained within the	Prior to site clearing, grading, or other ground disturbing activities	Written documentation of compliance with BIO-3 shall be submitted to El Dorado County Planning and Building Department prior to ground disturbing activities

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	project's Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP). The fencing shall be shown on any grading permit plans, building permit plans, and any final construction documents. The fencing shall be checked regularly by a qualified biologist and maintained until all construction is complete. No construction activity shall be allowed until this condition is satisfied. This mitigation measure shall be noted on any grading plans and/or construction plans. Fencing installed on the project site will cap all top opening or fill the three holes on the top (e.g., with a bolt and nut), of any u-channel posts, signs, or vertical poles installed temporarily or permanently throughout the course of the project to prevent the entrapment of wildlife, especially birds of prey.		
	BIO-4: Northwestern Pond Turtle Avoidance. To minimize adverse impacts on northwestern pond turtles and their habitat from project construction activities occurring within suitable habitat (intermittent stream and adjacent uplands), the project applicant and/or its contractor(s) shall implement the following measures during construction activities that require in-water work or ground disturbance within 300 feet of aquatic habitat in uninterrupted upland habitat (or within suitable upland habitat [e.g., annual grassland or valley foothill riparian]) or suitable aquatic habitat to minimize adverse impacts on northwestern pond turtles and their habitat: ▪ A qualified biologist shall be retained to conduct pre-construction visual encounter surveys of aquatic habitat for northwestern pond turtle occupancy. A minimum of two surveys shall be conducted at least 2 weeks apart during the morning (within 2 hours of 8:00 a.m.) or mid-afternoon (3:00 to 5:00 p.m.) when northwestern pond turtles are typically basking and the first inspection shall be completed no more than 4 weeks before construction activities commence. The purpose of the survey is to identify occupied aquatic habitat features around which further investigations of upland nesting would need to occur in subsequent measures. If no northwestern pond turtles are detected, implementation of the bullets listed below shall not be required. If northwestern pond turtle is detected during the surveys, the measures below shall be implemented. ▪ (If detected during the pre-construction survey above) Qualified biologists shall conduct visual detection/nesting surveys of upland areas for northwestern pond turtle within 160 feet of occupied aquatic habitat in May and June prior to	For construction activities within suitable habitat: two (2) preconstruction surveys conducted no more than four (4) weeks prior to construction. If survey is positive, conduct visual detection/nesting surveys and implement avoidance measures	Written documentation of compliance with BIO-4 shall be submitted to El Dorado County Planning and Building Department prior to ground disturbing activities. Consult with USFWS and CDFW regarding potential relocation and protection of nests and construction

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	project construction activities (including site clearing/grading) to mark/flag/protect as many nests as possible. An exclusion buffer of at least 50 feet around any found northwestern pond turtle nests shall be created by installing construction fencing or another obvious barrier that shall not be crossed by construction equipment. ▪ *(If detected during the pre-construction survey above)* To prevent entrapment within the active work area, the biologist shall monitor any potential dewatering and/or diversion work to rescue and with necessary handling permits and prior approval from U.S. Fish and Wildlife Service and California Department of Fish and Wildlife will relocate northwestern pond turtles and other native aquatic wildlife species from to suitable habitat outside the work area. ▪ *(If detected during the pre-construction survey above)* Eggs shall be covered slightly with dry soil by the biologist and the nest site protected from construction/ predation (flagging, cage over the spot, etc.). The biological monitor or other responsible on-site party shall call USFWS (if species is listed under the ESA) and CDFW for further direction and the eggs shall not be moved unless direction from USFWS (if applicable) and CDFW to do so is received. If live hatchlings are excavated between August 1 through October 31, a qualified biologist with an appropriate handling permit from USFWS and CDFW shall transfer the neonates to the source water body nearest the nest site. If live hatchlings are excavated between November 1 through February 29, the nestling turtles will not survive outside the nest and must be transferred by a qualified biologist with a handling permit from USFWS and CDFW to a licensed wildlife rehabilitator. ▪ All equipment (e.g., buckets, boots, waders) that has contact with water bodies shall be sterilized in accordance with the CDFW Aquatic Invasive Species Disinfection/Decontamination Protocols (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=92821) or current guidance. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-4. Per the circumstances described in Mitigation Measure BIO-4, the pre-construction survey shall be completed prior to any ground-disturbing activities. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		monitoring, if detected

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	BIO-5: Nesting Bird Avoidance. If site clearing, grading and other construction activities begin during the nesting season (February 1 to August 31), a qualified biologist (as approved by California Department of Fish and Wildlife [CDFW]) shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the disturbance area for nesting raptors, including white-tailed kite, and 250 feet for other nesting birds, including the grasshopper sparrow. The survey shall be conducted by a qualified biologist no more than 7 days prior to the onset of grading or construction activities. For the tricolored blackbird, a protocol level survey will be conducted in suitable nesting and foraging habitat within 0.25 miles of the project work area to the extent the developer has land rights to access those areas. Tricolored blackbird surveys will be conducted during the nesting season (March 15 to July 31). For the tricolored blackbird, if construction is initiated in the project work area during the nesting season, three (3) surveys shall be conducted within fifteen (15) days prior to the construction activity, with one of the surveys within three (3) days prior to the start of the construction. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. If no active nests or breeding colonies are identified during the preconstruction survey, no further mitigation is necessary. Also, if construction is initiated outside of the nesting season no surveys are required for activities occurring in previously disturbed and continually active portions of the project. If any active nests are observed during the surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest, as approved by CDFW. The buffer distance, to be determined by the qualified biologist, shall typically range from 50 to 300 feet, and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.	Prior to construction activities during the nesting season: For tricolored blackbird, 3 surveys between 15 and 3 days prior to construction (March 15 – July 31). For all other species, 1 survey no less than 7 days prior (Feb. 1 – Aug. 31)	Written documentation of compliance with BIO-5 shall be submitted to El Dorado County Planning and Building Department prior to any ground disturbing activities If survey is positive, consult with CDFW and conduct construction monitoring as required

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	If tricolored blackbird breeding colonies are found, the foraging behavior of the colony shall also be documented. No work shall begin until CDFW has been consulted and compliance with CESA can be demonstrated. If at any time during the nesting season construction stops for a period of 7 days or longer, preconstruction surveys shall be conducted prior to construction resuming. Timing/Implementation: The developer/ applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-5. If a pre-construction survey is required (per the circumstances described in Mitigation Measure BIO-5), the survey's completion shall be within 7 days of any ground-disturbing activities (note: timing for tricolored blackbird above). This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
	BIO-6: Tricolored Blackbird Compensatory Mitigation. If take of tricolored blackbird is anticipated, then the project applicant will obtain an Incidental Take Permit from CDFW. Impacts on tricolored blackbird will be "fully mitigated", including the development of avoidance, minimization, and compensatory mitigation that shall be roughly proportional to the extent of the impact. Compensatory mitigation shall take the form of preservation, enhancement, rehabilitation, re-establishment, or creation of similar habitat in accordance with the Incidental Take Permit. The project applicant shall provide mitigation either through the purchase credits from an approved conservation bank or provide suitable permittee responsible habitat mitigation lands. Compensatory mitigation will be provided at a ratio of at least 1:1, or as determined appropriate by the California Department of Fish and Wildlife (CDFW) during consultation under CESA during the Incidental Take Permit process. ▪ Conservation Bank Credits. Credits shall be purchased at a conservation bank approved by CDFW for tricolored blackbird with a service area including the project, or at a conservation bank with a service area not including the project upon further approval of CDFW. Proof of purchase shall be provided to CDFW and El Dorado County prior to the issuance of any grading or building permit within 250 feet of the tricolored blackbird colony location. ▪ Habitat Mitigation Lands. Permittee responsible compensatory mitigation shall take the form of preservation, enhancement, re-habilitation, re-establishment, or creation of suitable tricolored blackbird habitat in accordance with CDFW	Prior to any ground disturbing activities, if surveys required by BIO-5 determine take of tricolored blackbird would occur.	CDFW to approve conservation bank credits or compensatory mitigation. El Dorado County Planning and Building Department to receive and confirm CDFW approval prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	mitigation requirements. Compensation may occur onsite or offsite by implementing a habitat management plan approved by CDFW.		
	BIO-7: Burrowing Owl Avoidance. Pre-construction surveys for burrowing owls shall be conducted by a qualified biologist prior to where clearing, grading or construction activities are planned within 500 feet of suitable habitat. Areas adjacent to the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Surveys shall be conducted no more than 30 days and no less than 14 days prior to the commencement of construction activities. If construction activities are delayed for more than 30 days after the initial preconstruction surveys, then a new preconstruction survey shall be required. All surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). This mitigation shall be implemented by the project applicant or their contractor. ▪ If burrowing owls are discovered on the project site during construction, the California Department of Fish and Wildlife (CDFW) approved biologist shall be notified immediately. Occupied burrows shall not be disturbed without prior approval from CDFW, and if necessary, possession of a CDFW Incidental Take Permit may be required for the species. ▪ If active burrows are observed within 500 feet of the project site, an impact assessment shall be prepared and submitted to the CDFW, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until the biologist determines that the burrowing owls have fledged and the burrow is no longer occupied. If this is infeasible, because the burrowing owl is currently a candidate for listing under CESA and afforded all protections under CESA, the project applicant shall consult with CDFW to obtain an Incidental Take Permit and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced, if it is still a candidate or has become CESA-listed. The mitigation plan shall be based on the requirements set forth in Appendix F of the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). No construction can commence until CDFW has approved the mitigation plan. The mitigation prescribed by the mitigation plan shall meet the following requirements:	No more than 30 days and no less than 14 days prior to the commencement of construction activities	Written documentation of compliance with BIO-7 shall be submitted to El Dorado County Planning and Building Department. If survey is positive, consult with CDFW and conduct construction monitoring as required by CDFW. If compensatory mitigation is required, provide CDFW-approved mitigation plan prior to issuance of grading permits.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	- Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide. - If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the RIA preferred project area depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity. - If suitable habitat is not available for conservation adjacent or proximate to the RIA preferred project area, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW. - If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors. Timing/Implementation: The developer/applicant shall be responsible for ensuring implementation of Mitigation Measure BIO-7. Per the circumstances described in Mitigation Measure BIO-7, County Planning Services shall verify the pre-construction		

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	survey's completion per the timing described in the first paragraph of Mitigation Measure BIO-7. This mitigation measure shall be noted on any Final Map, grading plans, and construction plans.		
Impact 3.3-2. The RIA preferred project could have an adverse effect on riparian habitat or other sensitive natural community.	**BIO-8:** Implement mitigation measures BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.	See BIO-2, BIO-3, and BIO-9.
Impact 3.3-3. The RIA preferred project could have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.	**BIO-9: Wetland Compensatory Mitigation.** The project applicant shall demonstrate no net loss of wetlands and other waters of the United States or state. To ensure this, wetland mitigation shall be developed as a part of the permitting process. Mitigation shall be provided to El Dorado County prior to any construction-related impacts to the existing waters/wetlands. The exact mitigation ratio shall be determined in consultation with the applicable permitting agencies, which may include U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or the Regional Water Quality Control Board (RWQCB). The amount of mitigation shall be based on the type and value of the waters/wetlands affected by the project, and shall be determined in consultation with the USACE, RWQCB, and/or CDFW during the regulatory permitting process and shall, at a minimum, comply with the Habitat Mitigation Summary Table in Policy 7.4.2.8 of the General Plan. Compensation shall take the form of preservation, enhancement, rehabilitation, reestablishment, or creation of similar habitat in accordance with USACE, RWQCB and/or CDFW mitigation requirements, as required under project permits. Compensation may occur offsite through purchasing credits at USACE, CDFW, and/or RWQCB-approved mitigation banks, purchasing of credits from an approved in-lieu fee program, and/or by implementing permittee either an onsite or offsite permittee responsible mitigation offset.	Prior to construction activities impacting waters/wetlands	Written documentation of mitigation requirements issued by USACE, CDFW, and/or RWQCB submitted to El Dorado County Planning and Building Department prior to issuance of grading permits
	BIO-11: Implement mitigation measures BIO-2 and BIO-3.	See BIO-2 and BIO-3.	See BIO-2 and BIO-3.
Impact 3.3-4. The RIA preferred project could interfere with established migratory wildlife corridors	**BIO-12:** Implement mitigation measures BIO-2, BIO-3, BIO-5, BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.	See BIO-2, BIO-3, BIO-5, and BIO-6.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
or impede the use of native wildlife nursery sites.			
Impact 3.3-6. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to candidate, sensitive, or special- status plant and wildlife species.	**BIO-13:** Implement mitigation measures BIO-1 through BIO-7.	See BIO-1 through BIO-7.	See BIO-1 through BIO-7.
Impact 3.3-8. The RIA preferred project, combined with other past and reasonably foreseeable future projects, could result in a cumulative impact to state or federally protected wetlands.	**BIO-14:** Implement mitigation measure BIO-9.	See BIO-9.	See BIO-9.
Impact 3.3-9. The RIA preferred project, combined with other past and reasonably foreseeable future projects, would result in a cumulative impact to migratory wildlife corridors or native wildlife nursery sites.	**BIO-15:** Implement mitigation measures BIO-5 and BIO-6.	See BIO-5 and BIO-6.	See BIO-5 and BIO-6.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
Impact 3.4-2. The RIA preferred project could cause a substantial adverse change in the significance of an archaeological resource.	**CUL-1: Cultural Resource Awareness Training.** Mitigation Measure TCR-1 shall be implemented and as noted therein, include training on potential archaeological or cultural resources.	See TCR-1.	See TCR-1.
	CUL-2: Unanticipated Discovery of a Cultural Resource. If unanticipated cultural or archeological resources are exposed during construction activities, the archaeological monitor shall be immediately notified and all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the archeologist to evaluate the significance of the find and determine whether or not additional study is warranted. Temporary flagging or staking by the archeologist shall be required around the resource to avoid any disturbance from construction equipment if the archeologist determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the archeologist. If the unanticipated cultural resource appear to be human remains, Mitigation Measures CUL-4 and TCR-4 shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the archeologist. Alternatively, the archeologist may determine that one of the other treatment strategies identified below is preferred for the particular cultural or archeological resource, in which case that treatment strategy shall be implemented. If the cultural or archeological resource is not determined to be a Tribal Cultural Resource under Mitigation Measure TCR-3 and is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the archeologist shall direct whether the treatment of the cultural or archeological resource is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and preservation. Prior to the relocation, burial, or removal of a cultural or archeological resource, the archeologist or project applicant shall document the cultural or archeological resource through pictures that are provided to the County. The photographs and management strategies recommended	Ongoing during construction activities	El Dorado County Planning and Building Department to be notified in writing of any potential find and work stoppage

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	by the archaeologist shall remain confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project construction contractor shall adhere to the management strategies approved by the archaeologist and County during all ground disturbing activities. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the archaeologist and County's Director of Planning and Building.		
Impact 3.4-3. The RIA preferred project could potentially damage or disturb human remains during project construction activities.	**CUL-4: Discovery of Non-Native American Human Remains.** If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately by the project contractor, and the El Dorado County coroner and archaeological monitor shall be notified immediately by the archeologist. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and mitigation measure TCR-4 shall be followed. The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing by the archeologist.	Ongoing during construction activities	Notify El Dorado County Coroner. El Dorado Planning and Building Department to approve resumption of work
Impact 3.4-4. The RIA preferred project, in combination with past, present and reasonably foreseeable future development, could result in a cumulative impact on archeological resources and human remains.	**CUL-5:** Implement mitigation measures CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.	See CUL-1, CUL-2, and CUL-4.
Impact 3.7-1. The RIA preferred project could generate GHG emissions, either directly or indirectly, that may have a	**GHG-1:** The following requirements shall be noted on project improvement plans, subject to review and approval by the El Dorado County Planning Services Department: ▪ The proposed project shall be designed such that the project is built all-electric, and natural gas infrastructure shall be prohibited onsite; and	During project design	El Dorado County Planning and Building Department to

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
significant impact on the environment.	▪ The project shall be constructed to include electric vehicle (EV) ready parking spaces at the ratio with which the current CalGreen Tier 2 standards require EV Capable spaces in effect at the time building permits are issued. If the use of all-electric for any project component(s) (e.g., an appliance) is not enforceable or commercially feasible at the time of issuance of building permit(s), the project applicant shall require future residential homebuilders to include pre-wiring in all residential units and the neighborhood commercial space (if approved as part of the Creekside Village Specific Plan) to allow for the future retrofit of all natural gas appliances with all-electric appliances and purchase off-site mitigation credits or forecasted mitigation units ("FMUs") (collectively, "GHG credits") for project-related greenhouse gas (GHG) emissions from the component(s) using natural gas instead of electric. The emissions from the use of natural gas shall be calculated by a qualified professional using El Dorado County Air Quality Management District (EDCAQMD), California Air Resource Board (CARB), or the EPA-approved emissions models and quantification methods available and submitted to the County for review and approval, which shall include third-party review by a qualified consultant of the County's selection and be subject to applicant reimbursement of consultant costs. Any and all GHG credits to off-set for the use of natural gas must be created through a CARB-approved registry. These registries are currently the American Carbon Registry (ACR), Climate Action Reserve (CAR), and Verra, although CARB may accredit additional registries in the future. These registries use robust accounting protocols for all GHG credits created for their exchange, including the six currently approved CARB protocols. This mitigation measure specifically requires GHG credits created for the project originate from a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. The selected protocol must demonstrate that the GHG emissions reductions are real, permanent, quantifiable, verifiable, enforceable, and additional. Definitions of these terms from 17 CCR 95802(a) are provided below. 1. Real: GHG reductions or enhancements result from a demonstrable action or set of actions and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the [GHG credit] project boundary and		review and approve design prior to approval of building permits. If GHG credits are required, written documentation of verified credits must be provided prior to the issuance of the certificate of occupancy for the first housing unit.

Table 1. Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure(s)	Implementation Schedule	Monitoring Agency and Method
	account for uncertainty and the potential for activity-shifting and market-shifting leakage. 2. Additional: GHG reductions or removals that exceed any GHG reduction, or removals otherwise required by law, regulation, or legally binding mandate, and that exceed any GHG reductions or removals that would otherwise occur in a conservative Business as Usual scenario. 3. Permanent: GHG reductions and removal enhancements are not reversible or, when GHG reductions and GHG-removal enhancements may be reversible, mechanisms are in place to replace any reversed GHG-emission reductions and GHG-removal enhancements to ensure that all credited reductions endure for at least 100 years. 4. Quantifiable: The ability to accurately measure and calculate GHG reductions or GHG-removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the [GHG credit] project boundary, while accounting for uncertainty. Activity-shifting, and market-shifting leakage. 5. Verifiable: A [GHG credit] project report assertion is well-documented and transparent such that it lends itself to an objective review by an accredited verification body. 6. Enforceable: The authority for CARB to hold a particular party liable and take appropriate action if any of the provisions of this article are violated. Note that this definition of enforceability is specific to the Cap and-Trade regulation, where CARB holds enforcement authority, but this measure shall employ GHG credits from the voluntary market, where CARB has no enforcement authority. Applying the definition to this mitigation measure means that GHG reductions must be owned by a single entity and backed by a legal instrument or contract that defines exclusive ownership. **Geographic Prioritization of GHG Credits** GHG credits from reduction projects in El Dorado County (County) shall be prioritized before projects in larger geographies (i.e., northern California, California, United States, and international). The project applicant shall inform brokers of the required		

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	geographic prioritization for the procurement of GHG credits. GHG credits from reduction projects identified in the County that are of equal or lesser cost compared to the settlement price of the latest Cap-and-Trade auction must be included in the transaction. GHG credits from reduction projects outside of the County may be purchased if adequate credits cannot be found in the County or if they exceed the maximum price identified above. The economic and geographic analysis undertaken to inform the selection of GHG credits must be provided by the project applicant to the County as part of the required documentation discussed below under Plan Implementation and Reporting. **Types of GHG Credits** GHG credits may be in the form of GHG offsets for prior reductions of GHG emissions verified through protocols or FMUs for future committed GHG emissions meeting protocols. Because emissions reductions from GHG offsets have already occurred, their benefits are immediate and can be used to compensate for an equivalent quantity of project-generated emissions at any time. GHG credits from FMUs must be funded and implemented within 5 years of project GHG emissions to qualify as a GHG credit under this measure (i.e., there can only be a maximum of 5 years lag between project emissions and their real-world reductions through funding a FMU in advance and implementing the FMU on the ground). Any use of FMUs that result in a time lag between project emissions and their reduction by GHG credits from FMUs must be compensated through a prorated surcharge of additional FMUs proportional to the effect of the delay. Because emissions of CO_2 in the atmosphere reach their peak radiative forcing within 10 years, a surcharge of 10% for every year of lag between project emissions and their reduction through a FMU shall be added to the GHG credit requirement (i.e., 1.10 FMUs would be required to mitigate 1 metric ton of project GHG emissions generated in the year prior to funding and implementation of the FMU). **Verification and Independent Review of GHG Credits** All GHG credits shall be verified by an independent verifier accredited by the ANSI National Accreditation Board (ANAB) or CARB, or an expert with equivalent qualifications to the extent necessary to assist with the verification. Following the		

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	standards and requirements established by the accreditation board (i.e., ANAB or CARB), the verifier shall certify the following: ▪ GHG credits conform to a CARB-approved protocol or a protocol that is equal to or more rigorous than CARB requirements under 17 CCR 95972. Verification of the latter requires certification that the credits meet or exceed the standards set in 17 CCR 95972. ▪ GHG credits are real, permanent, quantifiable, verifiable, enforceable, and additional, as defined in this measure. ▪ GHG credits are purchased according to the geographic prioritization standard defined in this measure under Geographic Prioritization of GHG Credits. Verification of GHG offsets must occur as part of the certification process for compliance with the accounting protocol. Because FMUs are GHG credits that result from future projects, additional verification must occur beyond initial certification is required. Verification for FMUs must include initial certification and independent verification every 5 years over the duration of the FMU generating the GHG credits. The verification shall examine both the GHG credit realization on the ground and its progress toward delivering future GHG credits. The project applicant shall retain an independent verifier meeting the qualifications described above to certify reductions achieved by FMUs are achieved following completion of the future reduction project.		
Impact 3.7-2. The RIA preferred project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	**GHG-2:** Implement mitigation measure GHG-1.	See GHG-1.	See GHG-1.
Impact 3.10-1. The RIA preferred project could result in an increase in temporary (construction) ambient noise levels in excess of County standards.	**NOI-1: Construction Noise Control Measures.** To the maximum extent practical, the following construction-related measures shall be incorporated into on-site and off-site infrastructure improvement operations: ▪ Noise-generating infrastructure improvement construction activities shall only occur between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 5:00 p.m. on weekends and on federal holidays.	Prior to and ongoing during construction	Written documentation of compliance plan for NOI-1 shall be submitted to El Dorado County

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	▪ All noise-producing project equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition. ▪ All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, state, or local agency shall comply with such regulations while in the course of project activity. ▪ Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible. ▪ Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive uses. ▪ Nearby residences shall be notified of construction schedules so that arrangements can be made, if desired, to limit their exposure to short-term increases in ambient noise levels.		Planning and Building Department prior to construction.
Impact 3.10-2. The RIA preferred project could result in an increase in permanent (operation) ambient noise levels in excess of County standards.	**NOI-2: Park Activity Noise.** Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. Solid noise barriers measuring a minimum of six feet in height (relative to backyard elevation) shall be constructed along residences proposed adjacent to the north and west sides of Village Park and the north, south, west and east sides of Neighborhood Park 2. The recommended noise barrier extension shall either be a solid masonry wall or wood fence. If a wood fence is selected as a barrier, the fence slats shall overlap by a minimum of two inches and screwed to the framing rather than nailed. The purpose of the overlapping slats and using screws rather than nails is to ensure that prolonged exposure to the elements does not result in visible gaps through the slats which would result in reduced noise barrier effectiveness. The final barrier design shall be reviewed by a qualified acoustical consultant prior to issuance of building permits.	Prior to issuance of building and/or grading permits	El Dorado County Planning and Building Department to review noise study and approve noise barrier prior to issuance of building and/or grading permits.
	NOI-3: Live or Amplified Music. An acoustic analysis prepared by a qualified acoustic specialist shall be required prior to discretionary authorization or permit approval by El Dorado County for any commercial activity featuring live or amplified music, pursuant to County Code Section 130.37.050.	Prior to discretionary authorization or permit approval	El Dorado County Planning and Building Department to incorporate

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			requirement into conditions of approval
Additional Project Considerations (Non-CEQA)	**NOI-4: Exterior Traffic Noise.** Any application submitted for a building and/or grading permit shall include an acoustical analysis (noise study) that verifies and demonstrates applicable County noise standards shall be met. The analysis shall be provided to the County's Planning and Building Department for review. To satisfy the General Plan 60 dBA L_{dn} exterior noise level standard at the backyards of the single-family residential lots proposed nearest to Latrobe Road (within 230 feet from the centerline of Latrobe Road), the construction of solid traffic noise barriers ranging from six to nine feet in height shall be required. Once site plans showing building pad elevations are available, a site-specific noise study shall be completed by a qualified noise consultant in order to determine the overall heights of barriers required at those locations. It is recommended that the traffic noise barriers shall be either a masonry wall, earthen berm, or combination of the two. Other materials may be acceptable (i.e., wood or wood composite fence with overlapping slat construction) but shall be reviewed by a qualified acoustical consultant prior to receiving building permits.	During preparation of final site plans	Written documentation of compliance with NOI-4 shall be submitted to El Dorado County Planning and Building Department prior to issuance of building permits
	NOI-5: Interior Traffic Noise. To achieve a greater margin of safety, the upper floor bedroom windows of the residential lots located north of Village Park adjacent to and visible from Latrobe Road or within 60 feet from the centerline of Latrobe Road and visible from Latrobe Road shall be upgraded to have a minimum Sound Transmission Class Rating of 32. Mechanical ventilation (air conditioning) shall also be provided for all residences to allow the occupants to close doors and windows to achieve compliance with the General Plan 45 dBA L_{dn} interior noise level standard.	Project design	El Dorado County Planning and Building Department to verify prior to issuance of building permits
Impact 3.13-1. The RIA preferred project could cause a substantial adverse change in the significance of a tribal cultural resource that is	**TCR-1: Tribal Cultural Resource (TCR) Awareness Training.** The following language shall be noted on project Improvement Plans subject to review and approval by the El Dorado County Planning and Building Department: Prior to the initiation of construction, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific Tribal Cultural Resource (TCR) Awareness Training. The training may be conducted in coordination	Prior to start of construction	Written documentation of compliance with TCR-1 shall be submitted to El

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listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or is a resource determined by the County to be significant.	with qualified cultural resource specialists and representatives from culturally affiliated Native American Tribes. The training shall emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any finds of significance to culturally affiliated Native American Tribes. All personnel required to receive the training shall also be required to sign a form that acknowledges receipt of the training, which shall be submitted to the El Dorado County Planning and Building Department. As a component of the training, a brochure shall be distributed to all personnel associated with the project implementation. At a minimum the brochure shall discuss the following topics in clear and straightforward language: ▪ Field indicators of potential archaeological or tribal cultural resources (i.e., what to look for, for example: archaeological artifacts, exotic or non-native rock, unusually large amounts of shell or bone, significant soil color variations, etc.). ▪ Regulations governing archeological resources and tribal cultural resources. ▪ Consequences of disregarding or violating laws protecting archeological or tribal cultural resources. ▪ Steps to take if a worker encounters a possible resource. The training shall include project specific guidance for on-site personnel including protocols for resource avoidance, when to stop work, and who to contact if potential archeological or TCRs are identified. The training shall also address the stoppage of work if potentially significant cultural resources are discovered during ground disturbing activities, and in the case of possible human remains the proper course of action requiring immediate contact with the County Coroner and the Native American Heritage Commission.		Dorado County Planning and Building Department prior to start of construction
	TCR-2: Tribal Monitoring. The project applicant or their construction contractor shall comply with the following measure to assist with identification of any unknown tribal cultural resources (TCRs) at the earliest possible time during project-related earthmoving activities. These measures shall be included as notes on the project improvements plans prior to their approval by the County. ▪ The project applicant shall contact the United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) (thpo@auburnrancheria.com) at least two weeks prior to project ground-disturbing activities within the areas identified for monitoring in the confidential Creekside Village Sites and Creek Monitoring Map prepared by UAIC and within 200 feet of P-09-000168 (collectively,	Minimum two weeks prior to start of construction. Ongoing during construction within the Monitoring Area.	Written documentation of compliance with TCR-2 shall be submitted to El Dorado County Planning and Building Department

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	"Monitoring Area") to retain the services of a UAIC Certified Tribal Monitor ("Tribal Monitor"). The duration of the construction schedule and Tribal Monitoring shall be determined at this time. ▪ A contracted Tribal Monitor shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground disturbing activities within the Monitoring Area. All ground-disturbing activities within such areas shall be subject to Tribal Monitoring unless otherwise determined unnecessary by UAIC. A contracted UAIC certified Tribal Monitor shall spot check up to 16 hours per month the ground-disturbing activities within all other areas of the project site. ▪ The Tribal Monitor or UAIC Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall provide up to 48 hours for UAIC Tribal Government Representatives to examine the resource. ▪ If unanticipated TCRs (i.e., sites, features, or artifacts) are exposed during construction activities, Mitigation Measure TCR-3 shall be implemented. ▪ To track the implementation of this measure, the Tribal Monitor shall document field-monitoring activities on a Tribal Monitor log. ▪ The Tribal Monitor shall wear the appropriate safety equipment while on the construction site. ▪ The Tribal Monitor, in consultation with the UAIC THPO and the project applicant, shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting TCRs. ▪ In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without Tribal Monitoring. At no time, regardless or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.		prior to start of construction
	TCR-3: Unanticipated Discovery of a Tribal Cultural Resource (TCR). If unanticipated TCRs (i.e., sites, features, or artifacts including but not limited to cultural features, midden/cultural soils, artifacts, exotic rock [non-native], shell, bone, shaped stones, or ash/charcoal) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop to provide up to 48 hours for the Tribal Monitor and/or United Auburn Indian Community (UAIC) Tribal Government Representatives to evaluate the significance of the find and determine	Ongoing during construction	Written documentation of compliance with TCR-3 shall be submitted to El Dorado County

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	whether or not additional study is warranted. Temporary flagging or staking shall be required around the resource to avoid any disturbance from construction equipment if the Tribal Monitor determines that temporary flagging is necessary to protect the resource. The work exclusion buffer may be reduced based on the recommendation of the Tribal Monitor. If the unanticipated TCRs appear to be human remains, Mitigation Measure TCR-4 shall be implemented. If the Tribal Monitor or UAIC Tribal Government Representatives determine that the potential resource appears to be a TCR (as defined by Public Resources Code Section 21074), treatment shall be consistent with the following: ▪ If the TCR is within an Open Space area that was not approved for grading or other disturbance, preservation in place shall occur, if recommended by the Tribal Representative. Alternatively, the Tribal Historic Preservation Officer (THPO) may determine that one of the other treatment strategies identified below is preferred for the particular TCR, in which case that treatment strategy shall be implemented. ▪ If the TCR is within an area planned for residential lots, road and infrastructure improvements, grading, park improvements, or other development activity approved as part of the project, the THPO and/or UAIC Tribal Government Representative shall direct whether the treatment of the TCR is one or more of the following: (1) recordation of the resource; (2) recovery and reburial in or relocation to an Open Space preserve area within the Specific Plan, in which case the UAIC Tribal Government Representatives shall identify the placement of the reburial or relocated area; (3) preservation in place through burial if feasible given the final elevation of the area and intended development; or (4) removal and provided to UAIC. Prior to the relocation, burial, or removal of a TCR, UAIC shall record the resources according to UAIC Preservation Department Recommendations for Respectful and Accurate Recordation of Tribal Cultural Resources (TCR) and Cultural Significance/Integrity on Department of Recreation Form (DPR) 523 Forms. ▪ The applicant shall document the TCR through pictures that remain confidential and are provided to the Tribal Government Representatives. The photographs and management strategies recommended by the Tribal Government Representatives or THPO and carried out by the Tribal Monitor shall remain		Planning and Building Department toprior to restart of construction after any discovery

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	confidential and be provided to the County in writing and approved by the El Dorado County Director of Planning and Building. The project contractor shall adhere to the management strategies approved by the Tribal Government Representatives or THPO and County. Ground-disturbing activities may resume once the management strategies have been implemented to the satisfaction of the Tribal Monitor and County's Director of Planning and Building. ▪ The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Government Representatives, THPO, and Tribal Monitors shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.		
	TCR-4: Discovery of Native American Human Remains. If human remains are discovered during ground-disturbing construction work, all construction within 100 feet of the remains shall be halted immediately, and the El Dorado County coroner shall be notified immediately. If the remains are found to be non-Native American or the result of a crime scene, then the procedures in state law and Mitigation Measure CUL-1 shall be followed. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC), United Auburn Indian Community (UAIC), and Wilton Rancheria shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Development activity within the buffer area shall not resume until the landowner has discussed and conferred, as prescribed in Section 5097.98 of the Public Resources Code, with the most likely descendants regarding their recommendations as provided for in Section 5097.98 to ensure that the remains are treated with appropriate dignity. As provided for in subsection 5097.98(a), the descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. If no likely descendants are located or recommendations are not made, the applicant shall comply with Section 5097.98, including but not limited to Section 5097.98(e).	Ongoing during construction	Notify El Dorado County Coroner. El Dorado Planning and Building Department to approve resumption of work

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	The County shall be responsible for confirming compliance with Section 5097.98 and CEQA Guidelines Section 15064.5(e) and the resumption of ground-disturbing activities within 100 feet of the boundaries of the sensitive area defined by the investigation where the remains were discovered shall not occur until compliance with those standards is demonstrated in writing.		
	TCR-5: Documentation and Relocation of TCRs. TCR P-09-006012 shall be subject to appropriate archaeological and Tribal documentation prior to ground disturbing activity and relocated to a location with identified TCRs that shall not be impacted by grading or other site disturbing activities. The project applicant shall do the following: ▪ Obtain written United Auburn Indian Community (UAIC) Tribal Historic Preservation Officer (THPO) approval prior to flagging P-09-006012 for relocation. Approval shall include any restrictions or requirements related to the relocation, such as type of equipment to use, orientation of the TCR, location for the TCR to be moved to, etc. ▪ Send a Tribal notification and confirm the details for relocation at least 48 hours prior to any relocation work. ▪ Provide financial and logistical support for the protection, intact transport, and relocation of bedrock features or other elements of P-09-006012. ▪ Update the California Historic Resources Information System Center (CHRIS) Department of Parks and Recreation (DPR) forms to reflect the relocation work. Updates shall be consistent with Tribal preference for documenting TCRs. Tribes shall have final review authority on the DPR form(s) and shall be copied on submission to the CHRIS. DPR forms shall be prepared for Tribal review within two weeks of relocation work being completed and shall be submitted to the CHRIS within two weeks of Tribal approval.	Prior to ground disturbing activities	Written documentation of compliance with TCR-5 shall be submitted to El Dorado County Planning and Building Department prior to start of construction in any phase of construction that includes P-09-006012
Impact 3.13-2. The RIA preferred project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable	**TCR-7:** Implement mitigation measures TCR-1 through TCR-4.	See TCR-1 through TCR-4.	See TCR-1 through TCR-4.

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contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.			
Impact 3.15-2. The RIA preferred project could exacerbate wildfire risks exposing future residents to potential wildfire hazards.	**WF-1: Construction Fire Prevention Plan.** Prior to any ground-disturbing activities, including site clearing, grading or trenching, the project applicant(s) shall work with the El Dorado Hills Fire Department to prepare a Construction Fire Prevention Plan to be provided to all future developers. The plan shall address training of construction personnel and provide details of fire-suppression procedures and equipment to be used during construction. Information contained in the plan shall be included as part of project-related environmental awareness training to occur prior to any ground disturbance. At a minimum, the plan shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33 and shall include the following: ▪ Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions; ▪ Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days; ▪ Specifications for adequate water supply to service construction activities; ▪ On-site fire awareness coordinator role and responsibility; ▪ Construction worker training for fire prevention, initial attack firefighting, and fire reporting; ▪ Emergency communication, response, and reporting procedures; ▪ Coordination with local fire agencies to facilitate access through the project site; ▪ Implement all construction-phase fuel modification components prior to combustible building materials being delivered to the site; ▪ Emergency contact information; and ▪ Demonstrate compliance with applicable plans and policies established by state and local agencies.	Prior to ground disturbing activities	El Dorado Hills Fire Department to confirm compliance prior to start of construction

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	WF-2: Fire Safe Plan Recommendations. The Fire Safe Plan (FSP) provides customized measures that address potential fire hazards on the site. The measures are independently established but shall work together to result in reduced fire threat and heightened fire protection. These measures shall be established and accepted by the El Dorado Hills Fire Department prior to the issuance of the first building construction permit issued by the County. The following measures identified in Section 7.3 of the FSP shall be implemented and shall be included as notes on any Final Map, grading plans, and construction plans: ▪ Fencing materials used within 5-feet of all buildings shall be constructed of non-combustible materials. ▪ Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials. ▪ Combustible sheds and other outbuildings shall be kept at least 30 feet from residential dwellings and other buildings on each parcel. ▪ The following specific alternative material and construction methods, exceeding the minimum criteria described in CBC Chapter 7A, shall be implemented within the project to meet the "Practical Effect" principles (described in CCR Title 14 – section 1276.01) when buildings are located within 30-feet of property lines to reduce the potential for building-to-building fire spread may include, but are not limited to the following provisions: - All spaces between roof decking and the Class A roof covering shall be blocked to prevent embers from catching and igniting the building; and Eaves shall be boxed in (soffit-eave design) and protected with ignition resistant or non-combustible materials; and - Ignition resistant building materials, such as stucco, fiber cement wall siding, fire retardant treated wood, or other approved materials shall be used when neighboring buildings are within 30-feet; and - WUI ember and flame-resistant vents, conforming with the requirements of ASTM E2886, shall be used to protect exterior wall openings when the wall is located within 30-feet of another building or faces the Wildland Fuel Reduction Zone areas; and - The size and number of windows to bedroom rescue window openings and other essential location shall be limited when the exterior wall is located	Prior to issuance of the first building construction permit	El Dorado Hills Fire Department to verify compliance prior to issuance of grading and/or building permits

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	within 30-feet of another building. Windows on all sides of buildings shall be constructed of multi-pane glazing with a minimum of one tempered pane on the exterior side; and - Exterior doors of buildings shall be constructed of non-combustible or ignition-resistant material, or shall be constructed of solid core wood compliant with California Residential Code Section R327.8.3 when located within 30-feet of another building; and - Combustible decks that are cantilevered over the natural slope shall be enclosed to reduce the accumulation of debris and combustible storage items that may be ignited by fire brands. The construction of combustible decks shall comply with the building construction requirements found in CBC Section R337; and - A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior walls of all buildings. Non-combustible materials include brick, stone, fiber-cement siding, or concrete; and - Address numbers on each residential building shall be either internally or externally illuminated. ▪ Wildfire fuel reduction management and defensible space practices for the project shall follow the requirements identified in Chapter 6 of the FSP. ▪ A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented. ▪ "No Smoking" signs shall be posted at all trail entrances. ▪ At all trail intersections with the roads that have vehicle access there shall be a knock down bollard or gate with a Knox® padlock, or other approved lock, to allow for the passage of emergency equipment onto the trail. ▪ A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet). ▪ A Homeowners Association (HOA), or other acceptable entity, shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in Chapter 6 of the FSP.		

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	▪ A HOA, or other acceptable entity, shall be responsible for enforcing compliance with all applicable federal, state and County regulations related to defensible space and vegetation management. ▪ Reliable on-going sources of funding shall be established and acceptable to the El Dorado Hills Fire Department prior to the recording of the final map for the project.		
	WF-3: Emergency Preparedness and Evacuation Preparedness. The following measures identified in Section 7.4 of the Fire Safe Plan (FSP) shall be implemented. The Homeowner's Association shall be responsible for providing the following information to project occupants in consultation with the El Dorado Hills Fire Department. ▪ CAL FIRE Ready-Set-Go education materials shall be made available to all new residents of the project for their use in preparing for an evacuation. Fire Department and CAL FIRE shall be encouraged to visit the neighborhood annually to discuss this material and answer questions by the homeowners. See Fire Safe Plan Chapter 8 – Appendix J for additional details. ▪ El Dorado County Office of Emergency Services education materials on the "RAVE" program shall be made available to all new residents of the project for use in receiving timely notification information regarding the need to evacuate. See Fire Safe Plan Chapter 8 – Appendix L for additional details.	Ongoing during project operation	HOA shall demonstrate compliance upon request of El Dorado Hills Fire Department
	WF-4: Prohibited Plants. A landscape plan shall be submitted to the El Dorado Hills Fire Department for review and approval prior to the issuance of building permits. The landscape plan shall include a fire-resistant plant palette consistent with Appendix I of the Fire Safe Plan and shall not include tress and vegetation identified by the El Dorado Hills Fire Department on its current list of Highly Flammable Trees & Vegetation, which are plant communities and their associated plant species known to have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading, shall be prohibited in the CVSP proposed landscape plan. The proposed landscape plan shall be consistent with the El Dorado Hills Fire Department Defensible Space guidelines, the El Dorado County Weed Abatement guidelines, and the El Dorado County Fire Safe	Prior to issuance of building permits	El Dorado Hills Fire Department to verify prior to issuance of first grading or building permit

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	Council. This mitigation measure shall be included as a note on any Final Map, grading plans, and construction plans.		
Impact 3.15-3. The RIA preferred project could exacerbate fire risk associated with the installation and maintenance of project-related infrastructure.	**WF-5:** Implement mitigation measures WF-1 and WF-4.	See WF-1 and WF-4.	See WF-1 and WF-4.
Impact 3.15-4. The RIA preferred project could expose future residents or structures to hazards associated with post-fire runoff.	**WF-6: Post Fire Activities.** Following any on-site wildfire during project build-out in areas where development may be affected by post-fire risks, a post-fire field assessment shall be conducted by an engineering geologist or civil engineer, in coordination with the El Dorado Hills Fire Department, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be provided to the County, El Dorado Hills Fire Department, and the County Emergency Operations Center for consideration of the work necessary to allow safe re-entry and/or re-occupation of the affected area.	Following any on-site wildfire during project development and prior to re-entry/re-occupation of the affected area.	El Dorado County Planning and Building Department and El Dorado Hills Fire Department to verify compliance after a wildfire event prior to re-occupation
Impact 3.15-6. Implementation of the RIA preferred project could exacerbate wildfire risk to onsite residents resulting in a cumulative contribution.	**WF-7**: Implement mitigation measures WF-1 through WF-4.	See WF-1 through WF-4.	See WF-1 through WF-4.

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