

**Targeted General Plan Amendment – Zoning Ordinance Update (TGPA-ZOU)  
 Recirculation Draft Environmental Impact Report (DEIR)  
 Agency, Organization and Group Comments received during recirculation of DEIR for the period of  
 January 29, 2015 through March 16, 2015.**

| # Assigned | Name  | Email  | Date Received | Method    | Date entered in DB |
|------------|---|--|---------------|-----------|--------------------|
| 311120     | Trevor Cleak – CA Water Board               |  | 02/27/15      | Hard copy | 04/01/15           |
| 301119     | John Hidahl - EDHAPAC                       | <a href="mailto:Hidahl@aol.com">Hidahl@aol.com</a>                             | 03/09/15      | Email     | 04/01/15           |
| 301121     | John Hidahl – EDHAPAC                       | <a href="mailto:Hidahl@aol.com">Hidahl@aol.com</a>                             | 03/09/15      | Email     | 04/01/15           |
| 301129     | Marlon Flournoy – DOT                       | <a href="mailto:marlon.flournoy@dot.ca.gov">marlon.flournoy@dot.ca.gov</a>     | 05/05/15      | Email     | 05/07/15           |
| 301122     | Eileen Cunningham – DOT                     | <a href="mailto:Eileen.cunningham@dot.ca.gov">Eileen.cunningham@dot.ca.gov</a> | 03/16/15      | Email     | 04/01/15           |
| 301123     | Eric Fredericks – DOT                       | <a href="mailto:Eric.fredericks@dot.ca.gov">Eric.fredericks@dot.ca.gov</a>     | 03/16/15      | Email     | 04/01/15           |
| 301124     | John Hidahl – EDHAPAC                       | <a href="mailto:Hidahl@aol.com">Hidahl@aol.com</a>                             | 03/16/15      | Email     | 04/01/15           |
| 301125     | Renee Hargrove – EDC Farm Bureau            | <a href="mailto:reeneh@edcfb.com">reeneh@edcfb.com</a>                         | 03/16/15      | Email     | 04/01/15           |
| 301126     | Eileen Cunningham – DOT                     | <a href="mailto:Eileen.cunningham@dot.ca.gov">Eileen.cunningham@dot.ca.gov</a> | 03/17/15      | Email     | 04/01/15           |
| 291112     | Ellen VanDyke – Rural Communities United *  | <a href="mailto:vandyke.5@sbcglobal.net">vandyke.5@sbcglobal.net</a>           | 03/16/15      | Email     | 04/01/15           |
| 271052     | Ellen VanDyke – Rural Communities United ** | <a href="mailto:vandyke.5@sbcglobal.net">vandyke.5@sbcglobal.net</a>           | 07/23/14      | Email     | 7/28/14            |

\*Note: Due to large file size, Ellen VanDyke’s comments submitted on behalf of Rural Communities United are included as three separate pdf documents. Two of the three documents submitted on a CD were source protected and could not be included in a single pdf document.

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\*\* Previous DEIR comment #271052 resubmitted by Ellen VanDyke/Rural Communities United during RDEIR comment period.



311120



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## Central Valley Regional Water Quality Control Board

27 February 2015

Shawna Purvines  
County of El Dorado  
Community Development Agency  
2850 Fairlane Court, Building C  
Placerville, CA 95667

CERTIFIED MAIL  
7014 2120 0001 3978 0162

### **COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, TARGETED GENERAL PLAN AMENDMENT/ZONING ORDINANCE UPDATE PROJECT, SCH# 2012052074, EL DORADO COUNTY**

Pursuant to the State Clearinghouse's 29 January 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the Targeted General Plan Amendment/Zoning Ordinance Update Project, 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.

#### **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 Activities (Construction General Permit), Construction General Permit Order No. 2009-009-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](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

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/](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](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, 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 USACOE at (916) 557-5250.

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<sup>1</sup> 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.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE 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 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

**Waste Discharge Requirements**

If USACOE 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 will 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 Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/app\\_approval/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml); or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

**Low or 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 *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)

If you have questions regarding these comments, please contact me at (916) 464-4684 or [tcleak@waterboards.ca.gov](mailto:tcleak@waterboards.ca.gov).



Trevor Cleak  
Environmental Scientist

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



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

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**Fwd: EDHAPAC comments to the TGPA/ZOU RDEIR**

1 message

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**Shawna Purvines** <shawna.purvines@edcgov.us>  
To: TGPA-ZOU ZOU <TGPA-ZOU@edcgov.us>

Mon, Mar 9, 2015 at 8:02 PM

----- Forwarded message -----

From: &lt;Hidahl@aol.com&gt;

Date: Mon, Mar 9, 2015 at 8:00 PM

Subject: Re: EDHAPAC comments to the TGPA/ZOU RDEIR

To: [shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)

Thanks Shawna,

I'm going to let the R1 letter (sent later today) stand as the subcommittee report and submit a final full APAC letter following our meeting this Wednesday, March 11th, to be received by Monday March 16th at 5 PM.

John

In a message dated 3/9/2015 7:50:17 P.M. Pacific Daylight Time, [shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us) writes:

Hi John,

The close of comments is Monday March 16th by 5 p.m. So please take your time. You have one more week to final the letter.

Hope this helps.  
Shawna

On Mon, Mar 9, 2015 at 4:47 PM, &lt;Hidahl@aol.com&gt; wrote:

Hi Shawna,

While we are still finishing our review of this letter, I wanted to submit this version before 5 PM for the record. I will probably submit an updated version later today with full distribution.

Thanks, John

--

**Shawna L. Purvines**  
Principal Planner**County of El Dorado**  
Community Development Agency  
Long Range Planning  
2850 Fairlane Court  
Placerville, CA 95667  
Phone:(530) 621-5362/Fax: (530) 642-0508  
[shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)  
[www.edcgov.us](http://www.edcgov.us)

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Thank you.

—

**Shawna L. Purvines**

Principal Planner

**County of El Dorado**

Community Development Agency

Long Range Planning

2850 Fairlane Court

Placerville, CA 95667

Phone:(530) 621-5362/Fax: (530) 642-0508

[shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)

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Thank you.





TGPA-ZOU ZOU <tgpa-zou@edcgov.us>

**Fwd: EDHAPAC comments to the TGPA/ZOU RDEIR**

1 message

**Shawna Purvines** <shawna.purvines@edcgov.us>  
To: TGPA-ZOU ZOU <TGPA-ZOU@edcgov.us>

Mon, Mar 9, 2015 at 8:03 PM

----- Forwarded message -----

From: <Hidahl@aol.com>  
Date: Mon, Mar 9, 2015 at 4:47 PM  
Subject: EDHAPAC comments to the TGPA/ZOU RDEIR  
To: [shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)

Hi Shawna,

While we are still finishing our review of this letter, I wanted to submit this version before 5 PM for the record. I will probably submit an updated version later today with full distribution.

Thanks, John

-

**Shawna L. Purvines**  
Principal Planner

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Thank you.

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289K



**El Dorado Hills**  
**Area Planning Advisory Committee**  
 1021 Harvard Way  
 El Dorado Hills, CA 95762

**2015 Board**  
Chair  
 Jeff Haberman  
Vice Chair  
 Ellison Rumsey  
Secretary/Treasurer  
 Kathy Prevost

March 9, 2015

El Dorado County Development Services Department, Planning Services  
 Attn: Shawna Purvines, Senior Planner  
 2850 Fairlane Court, Building "C"  
 Placerville, CA 95667

**Subject: APAC Comments on the Recirculated Draft Program Environmental Impact Report (RDEIR)**

Dear Shawna,

The El Dorado Hills APAC TGPA/ZOU subcommittee was established in February 2012, based upon notification from County of the intent to make modifications to the General Plan and Zoning Ordinance. The subcommittee followed the progress on the DEIR, and submitted our comment letter on July 22, 2014. Since APACs next General meeting will be held on Wednesday March 11th, the APACs subcommittee is submitting this report to meet the March 9th timeline. Following the review of the subcommittee's report at our meeting, a final report will be submitted.

RDEIR specific comments

Summary comment:

2.6 Project Alternatives-The RDEIR added narrative and changes clearly leads to the conclusion that the "No project alternative" is the best available alternative for the residents of El Dorado County that value their current 'Quality of Life' (reference page 4-8, sections 4.5.1, 4.5.4 and Table 4.3). The analyzed "project" will increase densities in the Community Regions and the Rural Centers through primarily Zoning changes (reference Policies 2.1.1.3, 2.1.2.5, 2.2.1.2 and the changes that reduce open space requirements, allow building on slopes greater than 30%, and allowing narrower streets.) and result in additional 'significant but unavoidable' impacts. Given the required minimum changes to the GP that State Law dictates, an additional project alternative identified as something like "*State Law compliant-Minimal GP update*" needs to be added to the RDEIR for completeness.

Categorical comments:

2.4.3 Community Design Standards- The CEDAC-EDH group has defined their 'after LUPPU' efforts as being focused on creating an EDH Community Plan, which will include specific community design standards that are supported by the residents of EDH. As such, APAC supports the creation of a new/or updated County DISM and LDM except where public safety (i.e. sub-standard street widths, collector street shoulders) or quality of life considerations (i.e. outdoor lighting standards did not preserve the 'dark sky' in residential areas) would be substantially reduced from the current design standards. The EDH Community Plan will likely compare the current County standards to the DISM and LDM changes, to ensure that public safety and quality of life were not been significantly compromised.

3.9.1 Existing Conditions

APAC has followed the progress on the RDEIR and sincerely appreciates the added narrative relative to the differences in the Cal Trans US Hwy 50 LOS methodology, and the County DOT TDM methodology, which produced disparaging results. While APAC has supported the

development and use of the TDM model, we are very concerned that the model has not evolved as planned (i.e. to include LOS at intersections), has not been adequately calibrated and is not fully anchored to the most recent traffic data, particularly on Highway 50 and Green Valley Road. *Consequently, how will County work with Cal Trans to ensure that Cal Trans requirements specified on page 3.9-2 and 3.9-3 (see below) and Table 3.9-2 for Hwy 50 road segments 8 and 9 are achieved?* The approach defined on the bottom of page 3.9-3 and on 3.9-4 could lead to further deterioration of the relationship with Cal Trans, and result in legal actions.

The 2014 TCR/CSMP describes its approach to the LOS D and E performance standards as follows (emphasis in original):

... A local agency may set a higher LOS threshold standard consistent with community wishes and other local concerns. *Caltrans as the owner and operator of the facility establishes the Concept Level of Service as the **minimum acceptable level of service**. Any threshold standard LOS established by a local agency for the State Highway System (SHS) should not be lower than the Caltrans Concept LOS...*

and

LOS is one performance measure utilized by Caltrans in the review of proposed projects during the Intergovernmental Review/CEQA development review process to determine if proposed projects might cause significant impacts to the operation of the SHS. In segments of the SHS main line where the existing LOS is at or below the Concept LOS, any land use development should not directly or cumulatively lower the existing LOS. *Any impacts exceeding this threshold will be viewed by Caltrans as significant and warrant appropriate mitigation. Any CEQA lead agency should coordinate with Caltrans as early in the development review process as feasible to jointly determine the most appropriate threshold standards of significance.*

Reference: Page 3.9-12

The 2008 changes made by the BOS to GP Policy TC-Xf associated with Measure Y appears to have significantly altered the original intent of the voter's ballot measure, particularly in the area of the concurrency of road improvements with new development. Use of the CIP process has resulted in significant time delays for improvements in EDH, well beyond what was planned/envisioned at the time of approval. Changes proposed in the TGPA/ZOU update will 'worsen' this situation. The current EDH TIM fee schedule must be closely reviewed to determine its adequacy to fund timely infrastructure improvements that are directly caused by new development.

Reference: Page 3.9-23 and 3.9-31 thru -33

The added TCR/CSMP language is appreciated, but begs the question of *what is the BOS doing to respond to the Hwy 50 LOS F condition and the County's recent Green Valley Road (GVR) Traffic Analysis showing current LOS F conditions?* This must be addressed in this RDEIR. *Is the BOS going to add Hwy 50 segments 8 and 9 and Green Valley Road to table 3.9-4 as part of this RDEIR? Are the BOS going to agendize the acceptance of these conditions for the required 4/5ths vote?*

Reference: Page 3.9-24

Green Valley Road should be added to the Major County Roadways list, as it serves as a parallel routing to Hwy 50 when Hwy is closed down, and is planned for widening to 4 lanes in the EDH area. Likewise, White Rock Road should be added as a result of the planned Capital Connector project. Consideration should also be given to adding the Silva Valley Parkway to the Major County Roadways list, as construction has started.

### 3.9.2 Environmental Impacts

Reference: Page 3.9-27 (see below) first statement would not should be changed to wills and in second statement could should be changed to will

“The rezonings would not change the development potential. As a result, the rezonings would not change the expected traffic impacts that will occur as a result of implementation of the General Plan.”

“It is a reasonable probability that under some conditions these types of uses could result in localized traffic impacts.”

Reference: Page 3.9-33 Cal Trans analysis should be integral part of the TDM modeling

“For the reasons discussed above, El Dorado County has chosen to use its TDM as the study methodology in this analysis.”

Reference: Page 3.9-37 Table 3.9-7 shows that Green Valley Road has been at LOS F and worsening since 2010. Why hasn't the BOS acted on this violation of the GP Measure Y provisions? It is 2015, and the noted improvements are not planned until 2016 at the earliest.

#### 4.5.4 Summary of Impacts

The list of alternatives should be modified to include a *"State Law compliant-Minimal GP update"*

#### 5.1 Cumulative Impacts

Saratoga Estates should be added to Table 5-1.

Green Valley Road should be added to Table 5-2

We would like to acknowledge and thank the County Long Range Planning Department for adding meaningful narrative/content in this RDEIR from what the DEIR contained.

If you have any questions on any of the comments and/or concerns expressed herein, please contact one of the TGPA & ZOU Sub-Committee Co- Chairmen; John Hidahl @ (916 933-2703).

APAC appreciates having the opportunity to comment.

Sincerely,

*John Hidahl*

John Hidahl,  
TGPA & ZOU Sub-Committee Co- Chairman, APAC

cc: BOS1, BOS 2, BOS 3, BOS 4, BOS 5  
Planning Commission  
APAC Read File

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3 – SACRAMENTO AREA OFFICE  
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19  
SACRAMENTO, CA 95833  
PHONE (916) 274-0635  
FAX (916) 263-1796  
TTY 711



*Serious drought.  
Help save water!*

May 5, 2015

032015-ELD-0008  
03-ELD Various/PM Various  
SCH#2012052074

Ms. Shawna Purvines  
Long Range Planning  
El Dorado County  
2850 Fairlane Court, Building C  
Placerville, CA 95672

**Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) – Partially Recirculated Draft Environmental Impact Report (PRDEIR)**

Dear Ms. Purvines:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the County of El Dorado Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) PRDEIR. We also appreciate the County meeting with us to discuss this project on April 1, 2015. The project proposes amendments to existing policies and regulations and establishes new policies and regulations regarding land use and transportation within the unincorporated parts of El Dorado County. Several proposed policy changes associated with the project, including the consideration of increasing allowed densities in the residential component of a mixed use project on commercial land in conformance with Senate Bill (SB) 375 – the Sustainable Communities and Climate Protection Act of 2008 may influence future development throughout the County. The following comments, based on the PRDEIR, concern the analysis and implications of these changes, so that impacts to the State Highway System (SHS) are disclosed and adequately mitigated for, protecting interregional travel throughout the County. This letter replaces our previous letter from March 16, 2015 and Caltrans redacts the prior letter.

Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development project for impacts to the State Highway System in keeping with our mission, vision, and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

Ms. Purvines - Long Range Planning, El Dorado County  
 May 5, 2015  
 Page 2

### **Comments**

- 3.9.1 Existing Conditions, Table 3.9-1 (Pages 3.9-5, 3.9-6) – Table 3.9-1 is missing the “20-Year Build Level of Service (LOS)” for Segment 6.
- 3.9.2 Environmental Impacts, Methods of Analysis, Table 3.9-3, Level of Service Typical Traffic Volumes (Page 3.9-28-3.9-29) – Table 3.9-3 is used to calculate the LOS values reported in Tables 3.9-13, 5.2, and 5.3 (page 3.9-58, 5-12, 5-14). Table 3.9-3 homogenizes Highway Capacity Manual (HCM) freeway segment inputs, such as truck percentages, peak hour factor, physical geometry, and terrain, which impact LOS calculations.

The conclusions derived from using this methodology contradict the intent of the table. The project analysis attempts to make operational and design determinations (facility build-out design and significantly impacted locations) for the State Highway System (SHS) based on the build-out of the proposed project. See Table 3.9-3 note (page 3.9-29):

“Note: The planning thresholds shown in this table are provided for the purpose of assisting in the identification of locations where operational problems may exist and are based on information provided in the 2010 HCM and other industry sources. These values are not appropriate for making detailed or final determinations regarding operational or design considerations. Those determinations should only be made after a detailed operational analysis, consistent with current HCM procedures, and/or other design evaluations are completed.”

Caltrans suggests that the LOS calculations for US 50 reported in the PRDEIR be calculated using the Operational Analysis for Basic Freeway Segments.

- 3.9.2 Environmental Impacts, Methodology Selected for This Analysis (Page 3.9-31) – This section references the concurrence letter Caltrans provided to El Dorado County regarding the El Dorado County Travel Demand Model (EDCTDM) used for the project analysis:

The TDM used to model traffic in the DEIR was revised in response to comments received during review of the Draft EIR. The County received formal Caltrans concurrence on the TDM on September 22, 2014. In its letter, Caltrans states that the TDM conforms to the state-of-practice in travel demand modeling, meets overall traffic assignment validation standards suggested by Caltrans and the Federal Highways Administration, and is an appropriate tool for the County’s long range planning purposes. The revised TDM was re-run for all of the scenarios with the updated network requested by Caltrans.

Caltrans’ concurrence letter solely addresses the base year model, thus only supports the results of the base year model. Caltrans did not comment on or review future/cumulative scenario (2035) TDMs, therefore the future scenario models used in this document do not have an associated concurrence letter from Caltrans. References to Caltrans’ concurrence letter within the PRDEIR should be limited to the base year model only.

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Caltrans suggests the following language be included in the FEIR to clarify the reference to the Caltrans' concurrence letter contained in the PRDEIR:

Caltrans was not requested to concur with the County's growth forecast and/or model results stemming from the County's growth forecast, as local land use planning is outside of Caltrans' responsibility and authority.

Also, note that Caltrans' concurrence letter indicated that there are areas of the base year model where the traffic assignment outputs do not reflect existing conditions:

While the EDCTDM as a whole is acceptable and meets validation standards, please keep in mind when used for future specific projects, a subarea validation will be necessary for approval of traffic impact studies. Additionally, some areas of the model may exceed validation standards and/or generate unexpected outputs, which will require further model improvements and post processing to achieve acceptable results.

In such cases, the TDM requires calibration and validation to generate verifiable results.

- 3.9.2 Environmental Impacts, Tables 3.9-8 (Page 3.9-39) and 3.9-12 (page 3.9-44) – Consistent with the 2014 US 50 CSMP/TCR, the minimum LOS for segments 5, 6, 9, 13 and 14 should be listed as LOS E.
- 3.9.2 Environmental Impacts, Project Impacts, Table 3.9-13 LOS Summary Table (Page 3.9-58) – The LOS values reported for the existing conditions scenario differ from expected values on US 50. For example, according to PeMS the westbound US 50 segment between El Dorado Hills Boulevard/Latrobe Road and the El Dorado/Sacramento County line, currently operates at LOS F during the AM peak hour due to the high density of vehicles on US 50 and the weaving/merging traffic from the El Dorado Hills Boulevard/Latrobe Road on-ramp. Table 3.9-13 indicates that this segment currently operates at LOS C. While the existing LOS of this segment may change slightly from day to day, reporting the existing LOS as C significantly underestimates the traffic at this location (as detailed below) and adversely impacts the reasonableness of the future scenario analysis. Caltrans recommends the existing LOS analysis for this segment, and any others with lower than expected LOS for US 50, be recalculated using more appropriate input volumes. Attachment 1 shows existing PeMS volumes (AM peak hour, Monday-Thursday, spring and fall of 2010 and 2012) for the westbound US 50 segment between El Dorado Hills Boulevard/Latrobe Road and the El Dorado/Sacramento County line. The data shows that the general purpose lane peak hour volume used in the PRDEIR of 2,240 vehicles per hour (vph) (Segment 2, existing conditions – AM peak hour) is significantly lower than the reported general purpose lane count peak hour volumes in PeMS. Of the 170 days of PeMS peak hour volumes data attached, the PRDEIR volume of 2,240 vph is the second lowest count volume (see attached table). Furthermore, the data for this segment show that the 2035 build-out projection general purpose lane peak hour volumes are lower than existing PeMS volumes. Additionally, Attachment 2 shows PeMS volumes from the westbound US 50 detector station used in the PRDEIR (E. of Scott Rd mainline station 316993, March 2010). The data shows that

Ms. Purvines - Long Range Planning, El Dorado County  
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the detector operated at 0 percent observed during the reported count times. This indicates that no vehicles were counted at this location and the listed volumes are estimates derived by PeMS. Caltrans recommends the County use a general purpose lane peak hour volume of 3,200 for this segment and recalculate the LOS for the existing conditions and all other scenarios. Caltrans would typically choose a higher volume for the peak hour analysis (30<sup>th</sup> to 200<sup>th</sup> highest hour annually), however in this case choosing a more representative volume (85<sup>th</sup> percentile) is more reasonable. Using the above mentioned 3,200 vph will result in an existing LOS D, which is appropriate for this analysis.

The LOS analysis for the future scenarios, particularly scenarios 2, 5, and 6 (2035 land use build-out), underestimates future traffic conditions on US 50. While most of the future LOS analysis will be corrected and acceptable once the existing volumes are adjusted to the recommended volumes above, the impact of the cumulative conditions in 2035 (Scenario 6) on US 50 is underestimated in this analysis. Table 3.9-13 indicates that this segment will operate at LOS D in scenarios 2 and 5, and LOS B in scenario 6. These LOS calculations imply that the 2035 travel demand on this segment will reduce to lower levels than current demand, even with an additional 15,949 residential units included in the 2035 build-out projections as shown in Table 3.9-6 (Scenarios 2 and 6). El Dorado County is a net exporter of commuters, according to 2011 US Census data used in the Western El Dorado County Short and Long Range Transit Plan, and similar commuting trends are expected to continue into the future given existing and future large job centers in Sacramento, Rancho Cordova, Folsom, and Roseville, as well as the limited planned parallel capacity due to development planned around said capacity.

- 5.1 Cumulative Impacts, Table 5.1 Cumulative Projects (Page 5-2) – On page 5-2 PRDEIR states:

The County is currently considering applications for the approval of five large residential developments proposed in the western portion of the county (i.e., Central El Dorado Hills Specific Plan, Dixon Ranch, Lime Rock Valley Specific Plan, San Stino, and Village of Marble Valley Specific Plan). These are not part of the project but are being considered in this cumulative impact analysis pursuant to CEQA case law's interpretation of the phrase 'probable future projects'... This cumulative impact analysis assumes approval takes these projects impacts into consideration solely in order to meet the intent of State CEQA Guidelines Section 15130 for a worst case scenario perspective.

While the proposed developments referenced (in addition to the Folsom South of US 50 project), which include a total of 18,050 to 21,340 new residential units, are not part of the project, they are considered in the cumulative impact analysis.

Caltrans acknowledges that these projects are not included in this project as it is a program-level EIR. However, given the projected significant cumulative impact of these projects (page 5-11), Caltrans may require that these developments be included in relevant project-level traffic impact studies provided by the County in support of development proposals. Furthermore, this analysis



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may be a condition of encroachment permit approvals where an encroachment permit is necessary to comply with mitigation requirements.

Additionally, Caltrans requests that the County preserve an adequate amount of right-of-way to accommodate the ultimate design configuration of SHS interchanges impacted by the proposed developments included in the cumulative impact analysis.

- 5.1.10 Transportation and Traffic, Project Impacts, Table 5-3 Cumulative Significant Impacts on El Dorado County Roadway Segments (Page 5-14-5-26) – Bass Lake Road, south of US 50, is not included in Table 5.3 Cumulative Significant Impacts (super cumulative no project).

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this project.

If you have any questions regarding these comments or require additional information, please contact Eileen Cunningham, Intergovernmental Review Coordinator, at (916) 274-0639 or by email at [eileen.cunningham@dot.ca.gov](mailto:eileen.cunningham@dot.ca.gov).

Sincerely,



MARLON FLOURNOY  
Deputy District Director  
Planning and Local Assistance

c: Scott Morgan, State Clearinghouse

Ms. Purvines - Long Range Planning, El Dorado County  
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### Attachment 1: PeMS Peak Hour Counts

W. of Latrobe Mainline Station 316653  
 Spring/Fall 2010 and 2012 Volumes  
 7:00 am Monday-Thursday, No weekends or holidays  
 No HOV Lane Volumes  
 Sorted Highest to Lowest Volume

| Hour            | Flow<br>(Veh/Hour) | %<br>Observed | Hour            | Flow<br>(Veh/Hour) | %<br>Observed |
|-----------------|--------------------|---------------|-----------------|--------------------|---------------|
| 4/15/2010 7:00  | 3348               | 100           | 5/15/2012 7:00  | 3393               | 100           |
| 4/22/2010 7:00  | 3339               | 100           | 5/14/2012 7:00  | 3385               | 100           |
| 3/11/2010 7:00  | 3330               | 100           | 5/1/2012 7:00   | 3362               | 100           |
| 4/19/2010 7:00  | 3304               | 100           | 3/6/2012 7:00   | 3351               | 100           |
| 3/9/2010 7:00   | 3298               | 100           | 4/24/2012 7:00  | 3335               | 100           |
| 3/1/2010 7:00   | 3293               | 100           | 3/27/2012 7:00  | 3327               | 100           |
| 3/23/2010 7:00  | 3275               | 100           | 5/10/2012 7:00  | 3327               | 100           |
| 4/8/2010 7:00   | 3268               | 100           | 4/30/2012 7:00  | 3322               | 100           |
| 4/6/2010 7:00   | 3235               | 92            | 5/2/2012 7:00   | 3320               | 100           |
| 3/24/2010 7:00  | 3233               | 100           | 5/9/2012 7:00   | 3317               | 100           |
| 3/16/2010 7:00  | 3231               | 100           | 9/5/2012 7:00   | 3314               | 100           |
| 4/7/2010 7:00   | 3214               | 100           | 4/10/2012 7:00  | 3305               | 100           |
| 3/8/2010 7:00   | 3186               | 100           | 4/25/2012 7:00  | 3304               | 100           |
| 4/13/2010 7:00  | 3174               | 100           | 10/30/2012 7:00 | 3295               | 100           |
| 10/27/2010 7:00 | 3169               | 100           | 9/27/2012 7:00  | 3279               | 100           |
| 3/17/2010 7:00  | 3148               | 100           | 3/7/2012 7:00   | 3273               | 100           |
| 3/25/2010 7:00  | 3144               | 100           | 3/21/2012 7:00  | 3273               | 100           |
| 3/18/2010 7:00  | 3142               | 100           | 10/17/2012 7:00 | 3273               | 100           |
| 10/28/2010 7:00 | 3128               | 100           | 9/6/2012 7:00   | 3271               | 100           |
| 10/26/2010 7:00 | 3105               | 100           | 3/5/2012 7:00   | 3264               | 100           |
| 4/21/2010 7:00  | 3099               | 100           | 5/8/2012 7:00   | 3264               | 100           |
| 5/19/2010 7:00  | 3080               | 100           | 3/8/2012 7:00   | 3259               | 100           |
| 5/12/2010 7:00  | 3066               | 100           | 4/17/2012 7:00  | 3257               | 100           |
| 9/14/2010 7:00  | 3066               | 100           | 5/3/2012 7:00   | 3257               | 100           |
| 9/1/2010 7:00   | 3064               | 100           | 9/17/2012 7:00  | 3255               | 100           |
| 5/17/2010 7:00  | 3060               | 100           | 10/4/2012 7:00  | 3254               | 100           |
| 5/25/2010 7:00  | 3052               | 100           | 5/7/2012 7:00   | 3252               | 100           |
| 10/19/2010 7:00 | 3051               | 100           | 3/29/2012 7:00  | 3251               | 100           |
| 9/2/2010 7:00   | 3042               | 100           | 10/3/2012 7:00  | 3247               | 100           |
| 9/9/2010 7:00   | 3038               | 100           | 5/17/2012 7:00  | 3245               | 100           |

Ms. Purvines - Long Range Planning, El Dorado County  
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| Hour            | Flow<br>(Veh/Hour) | %<br>Observed |
|-----------------|--------------------|---------------|
| 9/15/2010 7:00  | 3033               | 100           |
| 10/20/2010 7:00 | 3032               | 100           |
| 4/12/2010 7:00  | 3029               | 100           |
| 10/13/2010 7:00 | 3029               | 100           |
| 9/8/2010 7:00   | 3027               | 100           |
| 3/22/2010 7:00  | 3025               | 100           |
| 9/21/2010 7:00  | 3025               | 100           |
| 3/4/2010 7:00   | 3024               | 100           |
| 3/15/2010 7:00  | 3022               | 0             |
| 5/18/2010 7:00  | 3020               | 100           |
| 10/5/2010 7:00  | 3001               | 100           |
| 3/3/2010 7:00   | 2998               | 100           |
| 9/16/2010 7:00  | 2994               | 100           |
| 10/6/2010 7:00  | 2990               | 100           |
| 3/2/2010 7:00   | 2987               | 100           |
| 9/22/2010 7:00  | 2982               | 100           |
| 10/14/2010 7:00 | 2979               | 100           |
| 4/20/2010 7:00  | 2968               | 100           |
| 10/7/2010 7:00  | 2961               | 100           |
| 5/13/2010 7:00  | 2960               | 100           |
| 9/23/2010 7:00  | 2957               | 100           |
| 10/21/2010 7:00 | 2956               | 100           |
| 9/29/2010 7:00  | 2955               | 100           |
| 9/7/2010 7:00   | 2948               | 100           |
| 5/11/2010 7:00  | 2947               | 100           |
| 9/13/2010 7:00  | 2943               | 100           |
| 3/10/2010 7:00  | 2934               | 100           |
| 10/12/2010 7:00 | 2931               | 100           |
| 5/20/2010 7:00  | 2929               | 100           |
| 9/27/2010 7:00  | 2929               | 100           |
| 4/5/2010 7:00   | 2923               | 100           |
| 9/20/2010 7:00  | 2922               | 100           |
| 9/30/2010 7:00  | 2916               | 100           |
| 10/25/2010 7:00 | 2903               | 100           |
| 5/10/2010 7:00  | 2902               | 100           |
| 10/18/2010 7:00 | 2895               | 100           |

| Hour            | Flow<br>(Veh/Hour) | %<br>Observed |
|-----------------|--------------------|---------------|
| 4/19/2012 7:00  | 3236               | 100           |
| 4/26/2012 7:00  | 3231               | 100           |
| 10/31/2012 7:00 | 3229               | 100           |
| 3/22/2012 7:00  | 3225               | 100           |
| 4/18/2012 7:00  | 3223               | 100           |
| 4/23/2012 7:00  | 3223               | 100           |
| 5/21/2012 7:00  | 3222               | 100           |
| 5/29/2012 7:00  | 3222               | 100           |
| 3/20/2012 7:00  | 3219               | 100           |
| 4/16/2012 7:00  | 3218               | 100           |
| 10/11/2012 7:00 | 3213               | 100           |
| 3/12/2012 7:00  | 3212               | 100           |
| 10/1/2012 7:00  | 3210               | 100           |
| 9/19/2012 7:00  | 3208               | 100           |
| 9/20/2012 7:00  | 3207               | 100           |
| 10/25/2012 7:00 | 3207               | 100           |
| 10/15/2012 7:00 | 3205               | 100           |
| 3/13/2012 7:00  | 3202               | 100           |
| 5/22/2012 7:00  | 3200               | 100           |
| 10/10/2012 7:00 | 3193               | 100           |
| 5/23/2012 7:00  | 3181               | 100           |
| 9/18/2012 7:00  | 3175               | 100           |
| 5/16/2012 7:00  | 3172               | 100           |
| 9/25/2012 7:00  | 3168               | 100           |
| 4/11/2012 7:00  | 3167               | 100           |
| 9/24/2012 7:00  | 3165               | 100           |
| 5/30/2012 7:00  | 3150               | 100           |
| 10/18/2012 7:00 | 3147               | 100           |
| 5/24/2012 7:00  | 3140               | 100           |
| 9/26/2012 7:00  | 3137               | 100           |
| 9/13/2012 7:00  | 3136               | 100           |
| 10/29/2012 7:00 | 3129               | 0             |
| 9/10/2012 7:00  | 3127               | 100           |
| 3/26/2012 7:00  | 3123               | 100           |
| 10/9/2012 7:00  | 3121               | 100           |
| 4/9/2012 7:00   | 3117               | 100           |

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| Hour           | Flow<br>(Veh/Hour) | %<br>Observed |
|----------------|--------------------|---------------|
| 10/4/2010 7:00 | 2886               | 100           |
| 5/26/2010 7:00 | 2875               | 100           |
| 5/24/2010 7:00 | 2849               | 33            |
| 5/27/2010 7:00 | 2794               | 100           |
| 5/5/2010 7:00  | 2784               | 100           |
| 5/4/2010 7:00  | 2762               | 100           |
| 4/29/2010 7:00 | 2749               | 100           |
| 9/28/2010 7:00 | 2739               | 100           |
| 4/28/2010 7:00 | 2724               | 100           |
| 4/1/2010 7:00  | 2723               | 100           |
| 4/27/2010 7:00 | 2717               | 100           |
| 3/30/2010 7:00 | 2707               | 100           |
| 3/29/2010 7:00 | 2704               | 100           |
| 4/26/2010 7:00 | 2578               | 100           |
| 5/3/2010 7:00  | 2568               | 100           |
| 4/14/2010 7:00 | 2500               | 100           |
| 3/31/2010 7:00 | 2347               | 100           |
| 5/6/2010 7:00  | 1670               | 96            |

| Hour            | Flow<br>(Veh/Hour) | %<br>Observed |
|-----------------|--------------------|---------------|
| 3/1/2012 7:00   | 3107               | 100           |
| 3/15/2012 7:00  | 3104               | 100           |
| 3/19/2012 7:00  | 3103               | 100           |
| 10/16/2012 7:00 | 3103               | 100           |
| 10/2/2012 7:00  | 3087               | 100           |
| 9/12/2012 7:00  | 3074               | 100           |
| 5/31/2012 7:00  | 2988               | 100           |
| 9/11/2012 7:00  | 2974               | 100           |
| 9/4/2012 7:00   | 2972               | 100           |
| 10/22/2012 7:00 | 2967               | 100           |
| 10/24/2012 7:00 | 2960               | 100           |
| 3/14/2012 7:00  | 2953               | 100           |
| 10/23/2012 7:00 | 2942               | 100           |
| 4/3/2012 7:00   | 2904               | 100           |
| 4/12/2012 7:00  | 2881               | 100           |
| 3/28/2012 7:00  | 2842               | 100           |
| 4/4/2012 7:00   | 2811               | 100           |
| 4/5/2012 7:00   | 2809               | 100           |
| 4/2/2012 7:00   | 2798               | 100           |

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 May 5, 2015  
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### Attachment 2: PeMS Peak Hour Counts

E. of Scott Mainline Station 316993  
 March 2010, 7:00 - 7:59 am, Monday-Friday  
 No weekends or holidays  
 No HOV Lane Volumes

| Hour           | Flow<br>(Veh/Hour) | %<br>Observed |
|----------------|--------------------|---------------|
| 3/1/2010 7:00  | 2765               | 0             |
| 3/2/2010 7:00  | 2561               | 0             |
| 3/3/2010 7:00  | 2598               | 0             |
| 3/4/2010 7:00  | 2794               | 0             |
| 3/5/2010 7:00  | 2522               | 0             |
| 3/8/2010 7:00  | 2753               | 0             |
| 3/9/2010 7:00  | 2791               | 0             |
| 3/10/2010 7:00 | 2730               | 0             |
| 3/11/2010 7:00 | 2727               | 0             |
| 3/12/2010 7:00 | 2466               | 0             |
| 3/15/2010 7:00 | 1100               | 0             |
| 3/16/2010 7:00 | 2679               | 0             |
| 3/17/2010 7:00 | 2652               | 0             |
| 3/18/2010 7:00 | 2653               | 0             |
| 3/19/2010 7:00 | 2396               | 0             |
| 3/22/2010 7:00 | 2971               | 0             |
| 3/23/2010 7:00 | 2734               | 0             |
| 3/24/2010 7:00 | 2682               | 0             |
| 3/25/2010 7:00 | 2770               | 0             |
| 3/26/2010 7:00 | 2689               | 0             |
| 3/29/2010 7:00 | 2354               | 0             |
| 3/30/2010 7:00 | 2859               | 0             |
| 3/31/2010 7:00 | 2714               | 0             |



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

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## Extension Request for TGPA-ZOU Comments

1 message

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Cunningham, Eileen R@DOT <eileen.cunningham@dot.ca.gov>

Mon, Mar 16, 2015 at 4:46 PM

To: "TGPA-ZOU@edcgov.us" <TGPA-ZOU@edcgov.us>

Cc: "Castro, Nieves X@DOT" <nieves.castro@dot.ca.gov>, "Fredericks, Eric B@DOT" <eric.fredericks@dot.ca.gov>

Hello,

I would like to request a one-day extension on the comment deadline for the TGPA-ZOU. Please let me know if this is possible.

Thank you,

Eileen Cunningham

Associate Transportation Planner  
California Department of Transportation, District 3  
Office of Transportation Planning - South

(916) 274-0639

[eileen.cunningham@dot.ca.gov](mailto:eileen.cunningham@dot.ca.gov)



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

---

## Caltrans Comments on the PRDEIR for the El Dorado County Targeted General Plan Amendment

1 message

---

Fredericks, Eric B@DOT <eric.fredericks@dot.ca.gov>

Mon, Mar 16, 2015 at 8:58 PM

To: "TGPA-ZOU@edcgov.us" <TGPA-ZOU@edcgov.us>

Cc: "Scott Morgan (Scott.Morgan@OPR.CA.GOV)" <Scott.Morgan@opr.ca.gov>, "Cunningham, Eileen R@DOT" <eileen.cunningham@dot.ca.gov>

Hi Shawna,

Please find Caltrans comments on the Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) – Partially Recirculated Draft Environmental Impact Report (PRDEIR).

A signed original copy will be sent by mail. Please let me or Eileen know if you have any questions.

Thanks,  
Eric



TGPA-ZOU Caltrans Comments 032015ELD0008.docx  
47K

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3 – SACRAMENTO AREA OFFICE  
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19  
SACRAMENTO, CA 95833  
PHONE (916) 274-0635  
FAX (916) 263-1796  
TTY 711



*Serious drought.  
Help save water!*

March 16, 2015

032015-ELD-0008  
03-ELD Various/PM Various  
SCH#2012052074

Ms. Shawna Purvines  
Long Range Planning  
El Dorado County  
2850 Fairlane Court, Building C  
Placerville, CA 95672

**Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) – Partially Recirculated Draft Environmental Impact Report (PRDEIR)**

Dear Ms. Purvines:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the County of El Dorado Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) PRDEIR. The TGPA-ZOU proposes amendments to existing policies and regulations and establishes new policies and regulations regarding land use and transportation within the unincorporated parts of El Dorado County. Several proposed policy changes associated with the project, including densification of some existing land uses, will influence future development throughout the County. The following comments, based on the PRDEIR, concern the analysis and implications of these changes, so that impacts to the State Highway System (SHS) are disclosed and adequately mitigated for, protecting interregional travel and safety throughout the County.

***Comments***

- Table 3.9-1 (pages 3.9-5, 3.9-6) is missing the “Build Level of Service (LOS)” for the Segment 6
- Tables 3.9-8 (page 3.9-39) and 3.9-12 (page 3.9-44) list the minimum LOS of US 50 as F/E and state that the source of the minimum LOS used is the 2014 US 50 CSMP/TCR. As we have stated before and according to the 2014 US 50 CSMP/TCR, the minimum LOS for an urban freeway is E. Please change the F/E segments to E
- Page 3.9-31 references Caltrans’ concurrence letter provided to El Dorado County regarding their travel demand model (TDM) used for this analysis:  
“The TDM used to model traffic in the DEIR was revised in response to comments received during review of the Draft EIR. The County received formal Caltrans concurrence on the TDM on September 22, 2014. In its letter, Caltrans states that the TDM conforms to the



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March 16, 2015  
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state-of-practice in travel demand modeling, meets overall traffic assignment validation standards suggested by Caltrans and the Federal Highways Administration, and is an appropriate tool for the County's long range planning purposes. The revised TDM was re-run for all of the scenarios with the updated network requested by Caltrans."

Our concurrence letter solely addresses the base year model, which we reviewed and commented on several times. This letter should not be used to support the results of any model other than the base year model. Caltrans did not receive the opportunity to comment on or review future/cumulative scenario (2035) Travel Demand Models (TDMs). Caltrans did receive copies of an older version of the 2035 EDCTDM, however we were told specifically not to review or comment because the future model was still in draft form. The future scenario models used in this document do not have an associated concurrence letter from Caltrans. Any reference to Caltrans concurrence should be limited to the base model only.

Our concurrence letter also stated: "while the model as a whole meets validation standards, some areas of the model do not meet validation standards and/or generate unexpected outputs. Traffic Impact Studies based on these areas of the EDCTDM will require additional model improvements and post processing to achieve acceptable results." This language was added because there are areas of the base year model where the traffic assignment outputs do not accurately reflect existing conditions and should not be used verbatim.

- Table 3.9-13 (pages 3.9-53-3.9-57) shows the current and future scenario LOS of ED County roadways. We reject many of the LOS values shown for US 50 for, specifically those segments that differ substantially from the values documented the 2014 Corridor System Management Plan (CSMP)/Transportation Concept Report (TCR) (for base and future years) and California Performance Measurement System (PeMS) for existing values. The segment between the county line and El Dorado Hills Boulevard/Latrobe Road currently operates at LOS F according to both the US 50 CSMP/TCR and PeMS and will operate at LOS F in the future, without significant capacity increasing or operational improvements and/or reduction in demand. However, according to Table 3.9-13, this segment currently operates at LOS B and C and will operate at LOS D in the future. This LOS calculation implies that 2035 travel demand on this segment will reduce to lower levels than current demand even with the build-out of the general plan. Even with the parallel capacity increases, a 2035 projection LOS D for the US 50 segment between the county line and El Dorado Hills Boulevard/Latrobe Road is highly infeasible.

Considering the TGPA-ZOU build-out projections, the project will have a significant impact on multiple segments of US 50 between the county line and Missouri Flat Rd. Please note, while using the county's own TDM, Caltrans projects LOS F in 2035 for multiple segments on US 50. The PRDEIR should be revised to reflect the correct LOS calculations and any necessary mitigations included.

Ms. Purvines - Long Range Planning, El Dorado County  
 March 16, 2015  
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Caltrans also rejects the LOS calculations for the super cumulative scenarios in Tables 5.2 and 5.3. The impact of this project is underestimated. The project will have a significant impact on multiple segments of US 50 in the super cumulative scenario.

- Caltrans does not agree with the “Method of Analysis” section (3.9-28) which uses Table 3.9-3 to calculate LOS in Tables 3.9-13, 5.2, and 5.3 (pages 3.9-53-3.9-57, 5-12, 5-14). The table homogenizes Highway Capacity Manual (HCM) freeway segment inputs which impact LOS calculations such as truck percentages, peak hour factor, physical geometry, and more importantly in this case terrain.

The conclusions derived from using this methodology contradict the intent of the table. The analysis within the document attempts to make operational and design determinations (what the facility should look like at build-out and which locations are significantly impacted by the project) for the SHS based on the build-out of the proposed project. See Table 3.9-3 note (page 3.9-29):

“Note: The planning thresholds shown in this table are provided for the purpose of assisting in the identification of locations where operational problems may exist and are based on information provided in the 2010 HCM and other industry sources. These values are not appropriate for making detailed or final determinations regarding operational or design considerations. Those determinations should only be made after a detailed operational analysis, consistent with current HCM procedures, and/or other design evaluations are completed.”

The LOS calculations for US 50 in the document should be calculated using a more appropriate methodology and realistic existing volumes.

- As indicated on page 5.2, the TGPA-ZOU does not include site specific development proposals. However, under Table 5.1 Cumulative Impacts, page 5-2 states that the County is considering applications for five large residential developments, referred to as "probable future projects", proposed in the western portion of the County. Table 5-1, Cumulative Projects, lists the following projects: Central ED Hills Specific Plan (SP), Dixon Ranch, Lime Rock Valley SP, San Stino, Village of Marble Valley SP, and the Folsom SOI. Together, these plans include a total of 18,050 to 21,340 homes. These developments are not part of the TGPA-ZOU, but are considered in the cumulative impact analysis. Further, it states that inclusion of the projects in this analysis does not imply that these general plan amendments will be approved by the County. The cumulative impacts analysis takes these project impacts into consideration in order to meet the intent of State CEQA Guidelines Section 15130 for a "worst case scenario".

The updated traffic model should include the cumulative projects for the 2035 (page 5-3) horizon year. If the County is including these projects in a worst case cumulative scenario, then the traffic demand model should also include these future projects. When Caltrans looks at development projects or State facility improvement projects, we always require a 20-year (or Design Year) forecast analysis. From the PRDEIR, it does not appear that the County is

Ms. Purvines - Long Range Planning, El Dorado County  
 March 16, 2015  
 Page 4

committed to including the above mentioned projects in the general plan, therefore potentially not committing to including the projects in their future model, so that State facilities can be accurately analyzed for a Design Year (cumulative scenario).

- Section 5.1 Cumulative Impacts: The State CEQA Guidelines Section 15355 quoted in the TGPA document: "...a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (page 5-1). The second bullet on page 5-3, regarding the determination of cumulative effects, states that the EIR is not required to analyze a cumulative impact to which the project would not contribute. Please explain how a cumulative scenario analysis of a project will not result in some form of cumulative impact (significant or not), especially when evaluated with other cumulative projects. Please explain how it is known that the project will not contribute to cumulative impacts if not analyzed. The statement appears to be less than accurate. The type of project being referred to should be specified in the PRDEIR.
- Page 5.3 states: "Cumulative effects that are less than significant are not required to be analyzed". Please explain how it is known that the cumulative effects of a project are not significant, before a cumulative analysis is completed. This statement appears to be inaccurate.
- Bass Lake Road is not included in Table 3.9-12 for 2035 and 2025 project impacts. Bass Lake Road should be included in this table given the major proposed developments located south of US 50 near Bass Lake Road.
- Bass Lake Road, south of US 50, is not included in Table 5.2 Cumulative Significant Impacts (super cumulative no project) on pages 5-14 through 5-26.
- Page 3.9-4, other references to Policy TC-Xa and the accompanying Table TC-2:
  - The last paragraph states that County roads are required to meet the standards set out in the General Plan. Caltrans reiterates, that US 50, SR 49, SR 153, and SR 193 are state facilities. They are maintained and operated by Caltrans and are not bound by County standards, with some exceptions.
  - The current level of service is inconsistently reported for these segments across the following tables: Table 3.9-1 (US Highway 50 2014 TCR/CSMP Report Data), Table 3.9-13 LOS Summary Table, and Table TC-2. Please provide an analysis of these segments (both US 50 and SR 49) that justifies the volume over capacity ratios shown on Table TC-2.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this project.

Ms. Purvines - Long Range Planning, El Dorado County  
March 16, 2015  
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If you have any questions regarding these comments or require additional information, please contact Eileen Cunningham, Intergovernmental Review Coordinator, at (916) 274-0639 or by email at [eileen.cunningham@dot.ca.gov](mailto:eileen.cunningham@dot.ca.gov).

Sincerely,

ERIC FREDERICKS, Chief  
Office of Transportation Planning – South

Cc: Scott Morgan, State Clearinghouse

Ms. Purvines - Long Range Planning, El Dorado County

March 16, 2015

Page 6

Bc: Marlon Flournoy, District 3, Division of Planning and Local Assistance  
Nieves Castro, District 3, Division of Planning and Local Assistance  
Jim Calkins, District 3 Freeway Operations  
D. Michael Smith, District 3 Freeway Operations  
Christine Zdunkiewicz, District 3 Freeway Operations  
Rick Montre, District 3 Highway Operations  
Teresa Limon, District 3 Highway Operations  
Nicholas Deal, District 3 Chief, Office of Travel Forecasting & Modeling  
Jasdeep Randhawa, District 3 Travel Forecasting & Modeling  
Eileen Cunningham, District 3, Division of Planning and Local Assistance



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

---

**Fwd: EDHAPAC approved Final comments to the TGPA/ZOU RDEIR**

1 message

---

Shawna Purvines <shawna.purvines@edcgov.us>  
To: TGPA-ZOU ZOU <TGPA-ZOU@edcgov.us>

Mon, Mar 16, 2015 at 4:18 PM

----- Forwarded message -----

From: &lt;Hidahl@aol.com&gt;

Date: Mon, Mar 16, 2015 at 4:15 PM

Subject: EDHAPAC approved Final comments to the TGPA/ZOU RDEIR

To: shawna.purvines@edcgov.us

Cc: jeff.h@ix.netcom.com, aerumsey@sbcglobal.net, hpkp@aol.com, bosone@edcgov.us, bostwo@edcgov.us, bosthree@edcgov.us, bosfour@edcgov.us, bosfive@edcgov.us, edc.cob@edcgov.us, rich.stewart@edcgov.us, gary.miller@edcgov.us, tom.heflin@edcgov.us, dave.pratt@edcgov.us, brian.shinault@edcgov.us, david.defanti@edcgov.us

Hi Shawna,

Attached is the APAC approved (5-0 vote) final submittal letter with comments on the TGPA/ZOU RDEIR. Other than the initial paragraph, it is identical to the subcommittee report submitted on March 9th.

Best Regards, John

--  
Shawna L. Purvines  
Principal Planner

County of El Dorado  
Community Development Agency  
Long Range Planning  
2850 Fairlane Court  
Placerville, CA 95667  
Phone:(530) 621-5362/Fax: (530) 642-0508  
[shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)  
[www.edcgov.us](http://www.edcgov.us)

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**El Dorado Hills**  
**Area Planning Advisory Committee**  
 1021 Harvard Way  
 El Dorado Hills, CA 95762

**2015 Board**  
Chair  
 Jeff Haberman  
Vice Chair  
 Ellison Rumsey  
Secretary/Treasurer  
 Kathy Prevost

March 16, 2015

El Dorado County Development Services Department, Planning Services  
 Attn: Shawna Purvines, Senior Planner  
 2850 Fairlane Court, Building "C"  
 Placerville, CA 95667

**Subject: Full APAC Comments-Recirculated Draft Program Environmental Impact Report (RDEIR)**

Dear Shawna,

The El Dorado Hills APAC TGPA/ZOU subcommittee was established in February 2012, based upon notification from County of the intent to make modifications to the General Plan and Zoning Ordinance. The subcommittee followed the progress on the DEIR, and submitted our comment letter on July 22, 2014. *APAC met on March 11<sup>th</sup>, and voted 5-0 to endorse the comments submitted by the subcommittee in the March 9<sup>th</sup> e-mail.* Consequently, this final submittal is identical to the March 9<sup>th</sup> submittal hereafter.....

RDEIR specific comments

Summary comment:

2.6 Project Alternatives-The RDEIR added narrative and changes clearly leads to the conclusion that the "No project alternative" is the best available alternative for the residents of El Dorado County that value their current 'Quality of Life' (reference page 4-8, sections 4.5.1, 4.5.4 and Table 4.3). The analyzed "project" will increase densities in the Community Regions and the Rural Centers through primarily Zoning changes (reference Policies 2.1.1.3, 2.1.2.5, 2.2.1.2 and the changes that reduce open space requirements, allow building on slopes greater than 30%, allow narrower streets, and increased home use occupation levels.) and result in additional 'significant but unavoidable' impacts. Given the required minimum changes to the GP that State Law dictates, an additional project alternative identified as something like "*State Law compliant-Minimal GP update*" needs to be added to the RDEIR for completeness.

Categorical comments:

2.4.3 Community Design Standards- The CEDAC-EDH group has defined their 'after LUPPU' efforts as being focused on creating an EDH Community Plan, which will include specific community design standards that are supported by the residents of EDH. As such, APAC supports the creation of a new/or updated County DISM and LDM except where public safety (i.e. sub-standard street widths, collector street shoulders) or quality of life considerations (i.e. outdoor lighting standards did not preserve the 'dark sky' in residential areas) would be substantially reduced from the current design standards. The EDH Community Plan will likely compare the current County standards to the DISM and LDM changes, to ensure that public safety and quality of life were not been significantly compromised.

3.9.1 Existing Conditions

APAC has followed the progress on the RDEIR and sincerely appreciates the added narrative relative to the differences in the Cal Trans US Hwy 50 LOS methodology, and the County DOT TDM methodology, which produced disparaging results. While APAC has supported the



development and use of the TDM model, we are very concerned that the model has not evolved as planned (i.e. to include LOS at intersections), has not been adequately calibrated and is not fully anchored to the most recent traffic data, particularly on Highway 50 and Green Valley Road. *Consequently, how will County work with Cal Trans to ensure that Cal Trans requirements specified on page 3.9-2 and 3.9-3 (see below) and Table 3.9-2 for Hwy 50 road segments 8 and 9 are achieved?* The approach defined on the bottom of page 3.9-3 and on 3.9-4 could lead to further deterioration of the relationship with Cal Trans, and result in legal actions.

The 2014 TCR/CSMP describes its approach to the LOS D and E performance standards as follows (emphasis in original):

... A local agency may set a higher LOS threshold standard consistent with community wishes and other local concerns. *Caltrans as the owner and operator of the facility establishes the Concept Level of Service as the **minimum acceptable level of service**. Any threshold standard LOS established by a local agency for the State Highway System (SHS) should not be lower than the Caltrans Concept LOS...*

and

LOS is one performance measure utilized by Caltrans in the review of proposed projects during the Intergovernmental Review/CEQA development review process to determine if proposed projects might cause significant impacts to the operation of the SHS. In segments of the SHS main line where the existing LOS is at or below the Concept LOS, any land use development should not directly or cumulatively lower the existing LOS. *Any impacts exceeding this threshold will be viewed by Caltrans as significant and warrant appropriate mitigation. Any CEQA lead agency should coordinate with Caltrans as early in the development review process as feasible to jointly determine the most appropriate threshold standards of significance.*

Reference: Page 3.9-12

The 2008 changes made by the BOS to GP Policy TC-Xf associated with Measure Y appears to have significantly altered the original intent of the voter's ballot measure, particularly in the area of the concurrency of road improvements with new development. Use of the CIP process has resulted in significant time delays for improvements in EDH, well beyond what was planned/envisioned at the time of approval. Changes proposed in the TGPA/ZOU update will 'worsen' this situation. The current EDH TIM fee schedule must be closely reviewed to determine its adequacy to fund timely infrastructure improvements that are directly caused by new development.

Reference: Page 3.9-23 and 3.9-31 thru -33

The added TCR/CSMP language is appreciated, but begs the question of *what is the BOS doing to respond to the Hwy 50 LOS F condition and the County's recent Green Valley Road (GVR) Traffic Analysis showing current LOS F conditions?* This must be addressed in this RDEIR. *Is the BOS going to add Hwy 50 segments 8 and 9 and Green Valley Road to table 3.9-4 as part of this RDEIR? Are the BOS going to agendize the acceptance of these conditions for the required 4/5ths vote?*

Reference: Page 3.9-24

Green Valley Road should be added to the Major County Roadways list, as it serves as a parallel routing to Hwy 50 when Hwy is closed down, and is planned for widening to 4 lanes in the EDH area. Likewise, White Rock Road should be added as a result of the planned Capital Connector project. Consideration should also be given to adding the Silva Valley Parkway to the Major County Roadways list, as construction has started.

### 3.9.2 Environmental Impacts

Reference: Page 3.9-27 (see below) first statement would not should be changed to wills and in second statement could should be changed to will

“The rezonings would not change the development potential. As a result, the rezonings would not change the expected traffic impacts that will occur as a result of implementation of the General Plan.”

“It is a reasonable probability that under some conditions these types of uses could result in localized traffic impacts.”

Reference: Page 3.9-33 Cal Trans analysis should be integral part of the TDM modeling

“For the reasons discussed above, El Dorado County has chosen to use its TDM as the study methodology in this analysis.”

Reference: Page 3.9-38 Table 3.9-7 shows that Green Valley Road has been at LOS F and worsening since 2010. Why hasn't the BOS acted on this violation of the GP Measure Y provisions? It is 2015, and the noted improvements are not planned until 2016 at the earliest.

Reference Page 3.9-40 Text added below needs further definition of why the BOS has not acted?

“In each case, the LOS would exceed Caltrans' 20-year concept LOS, but not the ultimate concept LOS.”

Reference Page 3.9-46: The following addition clearly defines the issue with some needed improvements not being consistent with development. It defines the BOS responsibilities to understand the 10 year history of significantly delayed, high priority CIP programs when establishing any future TIM fees. Implementation delays cost money, which the TIM fee structure needs to account for to capture the true 'life-cycle-costs' associated with not requiring concurrent improvements when new development is proposed.

“The timing of actual construction of road improvements funded through the TIM fee program may lag behind development given that growth patterns may have changed or the TIM program zone may have financial obligations that delay the construction of planned improvements. The County's CIP is reviewed annually, as required by the General Plan, to update the most current costs of material, land, labor etc. which cause variations in cost estimates, with right-of-way acquisition costs being one of the biggest factors. Because forecasts are imperfect, actual permit activity is checked annually to update the current year, five year and 10-year budget of which recommendations for amending the CIP are brought to the Board. Timing of roadway improvements also shift due to actual growth patterns (checked annually when compared to 20-year forecast). The Board of Supervisors ultimately determines the prioritization of projects within the Capital Improvement Program and adjusts the TIM fee accordingly.”

Reference Page 3.9-46: The following added statement should be removed. The current General Plan extension of the original Measure Y was initiated by the BOS. If the original Measure Y did not include enough funding sources to resolve this issue, why did they support it? As a minimum the statement must be changed to state .....limitations in the BOS 2008 Measure Y extensions fee-based.....

“This is because of the inherent limitations in Measure Y's fee-based funding approach, as discussed above.”

### 3.10.2 Environmental Impacts

Reference: Page 3.10-18

Policy 5.2.1.3 should not be changed as the impacts are significant and avoidable. Given the current measurements of ground water loss during drought periods, Policy 5.2.3.5 needs to be revised accordingly.

#### 4.5.4 Summary of Impacts

The list of alternatives should be modified to include a "*State Law compliant-Minimal GP update*"

#### 5.1 Cumulative Impacts

Saratoga Estates should be added to Table 5-1.

Green Valley Road should be added to Table 5-2

Reference: Page 5-11

The statement below acknowledges the cumulative impacts on traffic associated with the proposed ZOU changes. This further justifies the need for a new "*State Law compliant-Minimal GP update*" alternative.

However, the project would result in and cumulatively considerable incremental increase in traffic generation due to the TGPA's increase in density for mixed use projects and the expanded range of uses that can be considered under the ZOU."

One of the purposes of Measure Y was to not allow the worsening of traffic to the point of reaching Los F. The statement below acknowledges that the traffic on Hwy 50, El Dorado Hills Blvd, and Green Valley Road will cumulatively be significantly impacted (aka worsened) by the proposed "project". This also justifies the need for a new "*State Law compliant-Minimal GP update*" alternative.

"Nonetheless, the Cumulative Projects are projected to result in significant cumulative impacts on U.S. Highway 50 and several major county roads. Together, the Cumulative Projects would cause a cumulatively significant impact on several segments of U.S. Highway 50 between its Ponderosa Road interchange and the Sacramento County line. In addition, traffic volumes are projected to be cumulatively significant on segments of Cameron Park Drive, El Dorado Hills Boulevard, Green Valley Road, Missouri Flat Road, Pleasant Valley Road, and South Shingle Road."

We would like to acknowledge and thank the County Long Range Planning Department for adding meaningful narrative/content in this RDEIR from what the DEIR contained.

If you have any questions on any of the comments and/or concerns expressed herein, please contact one of the TGPA & ZOU Sub-Committee Co- Chairmen; John Hidahl @ (916 933-2703).

APAC appreciates having the opportunity to comment.

Sincerely,

*John Hidahl*

John Hidahl,  
TGPA & ZOU Sub-Committee Co- Chairman, APAC

cc: BOS1, BOS 2, BOS 3, BOS 4, BOS 5  
Planning Commission  
APAC Read File



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

---

**Fwd: RDEIR EDC TGPA-ZOU 2015**

1 message

---

Shawna Purvines <shawna.purvines@edcgov.us>  
To: TGPA-ZOU ZOU <TGPA-ZOU@edcgov.us>

Mon, Mar 16, 2015 at 4:19 PM

----- Forwarded message -----

From: Renee Hargrove &lt;reeneh@edcfb.com&gt;

Date: Mon, Mar 16, 2015 at 4:17 PM

Subject: RDEIR EDC TGPA-ZOU 2015

To: Economic Development &lt;shawna.purvines@edcgov.us&gt;

Cc: bosone@edcgov.us, bostwo@edcgov.us, The BOSTHREE &lt;bosthree@edcgov.us&gt;, The BOSFOUR &lt;bosfour@edcgov.us&gt;, The BOSFIVE &lt;bosfive@edcgov.us&gt;, Charlene Carveth &lt;charlene.carveth@edcgov.us&gt;, Jim Davies &lt;jimdaviesforestry@gmail.com&gt;

Hello, Shawna! Attached is the above-mentioned document, inclusive of comments.

Respectfully submitted,

*Renee' Hargrove*

*Executive Director*

*El Dorado County Farm Bureau*

[reeneh@edcfb.com](mailto:reeneh@edcfb.com)

530.622.7773

--

Shawna L. Purvines  
Principal Planner

County of El Dorado  
Community Development Agency

Long Range Planning  
2850 Fairlane Court  
Placerville, CA 95667  
Phone:(530) 621-5362/Fax: (530) 642-0508  
[shawna.purvines@edcgov.us](mailto:shawna.purvines@edcgov.us)  
[www.edcgov.us](http://www.edcgov.us)

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Thank you.



RDEIR comments EDC TGPA-Zoning March 2015.pdf

22K



2460 Headington Road  
Placerville, CA 95667-5216  
Phone: 530.622.7773  
Fax: 530.622.7839  
Email: info@edcfb.com

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Date: March 16, 2015

To: Shawna Purvines  
El Dorado County Community Development  
Agency, Long Range Planning

From: Reneé Hargrove, Executive Director  
Jim Davies, President

Subject: Partial Recirculated Draft Environmental Impact Report (RDEIR) for the El  
Dorado County Targeted General Plan Amendment and Zoning Ordinance  
Update

The El Dorado County Farm Bureau has reviewed the Partial Recirculated Draft Environmental Impact Report (RDEIR) for the Targeted General Plan Amendment (TGPA) and Zoning Ordinance Update (ZOU).

In general we find that the RDEIR fully analyzed and addressed a full range of issues and alternatives, particularly related to agriculture, needed to move the General Plan forward. Land Use Designations and Zoning were adeptly addressed as well.

At this time, we would like to congratulate you and the staff for a job well done. We look forward to working together well into the future to promote and protect the agricultural industry and our county's economic viability.

cc: El Dorado County Board of Supervisors  
El Dorado County Agricultural Commissioner, Charlene Carveth



TGPA-ZOU ZOU &lt;tgpa-zou@edcgov.us&gt;

---

**RE: Caltrans Comments on the PRDEIR for the El Dorado County Targeted General Plan Amendment**

1 message

Cunningham, Eileen R@DOT &lt;eileen.cunningham@dot.ca.gov&gt;

Tue, Mar 17, 2015 at 10:29 AM

To: "TGPA-ZOU@edcgov.us" &lt;TGPA-ZOU@edcgov.us&gt;

Cc: "Scott Morgan (Scott.Morgan@OPR.CA.GOV)" &lt;Scott.Morgan@opr.ca.gov&gt;, "Fredericks, Eric B@DOT" &lt;eric.fredericks@dot.ca.gov&gt;

Hi Shawna,

Attached is the signed copy of this letter.

Eileen Cunningham

Associate Transportation Planner  
California Department of Transportation, District 3  
Office of Transportation Planning - South

(916) 274-0639

[eileen.cunningham@dot.ca.gov](mailto:eileen.cunningham@dot.ca.gov)

---

**From:** Fredericks, Eric B@DOT**Sent:** Monday, March 16, 2015 8:59 PM**To:** [TGPA-ZOU@edcgov.us](mailto:TGPA-ZOU@edcgov.us)**Cc:** Scott Morgan ([Scott.Morgan@OPR.CA.GOV](mailto:Scott.Morgan@OPR.CA.GOV)); Cunningham, Eileen R@DOT**Subject:** Caltrans Comments on the PRDEIR for the El Dorado County Targeted General Plan Amendment

Hi Shawna,

Please find Caltrans comments on the Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) – Partially Recirculated Draft Environmental Impact Report (PRDEIR).

A signed original copy will be sent by mail. Please let me or Eileen know if you have any questions.

Thanks,

Eric



CT\_Comments\_TGPA-ZOU\_PRDEIR.pdf  
2118K



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3 – SACRAMENTO AREA OFFICE  
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19  
SACRAMENTO, CA 95833  
PHONE (916) 274-0635  
FAX (916) 263-1796  
TTY 711



*Serious drought.  
Help save water!*

March 16, 2015

032015-ELD-0008  
03-ELD Various/PM Various  
SCH#2012052074

Ms. Shawna Purvines  
Long Range Planning  
El Dorado County  
2850 Fairlane Court, Building C  
Placerville, CA 95672

**Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) – Partially Recirculated Draft Environmental Impact Report (PRDEIR)**

Dear Ms. Purvines:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the County of El Dorado Targeted General Plan Amendment and Zoning Ordinance Update (TGPA-ZOU) PRDEIR. The TGPA-ZOU proposes amendments to existing policies and regulations and establishes new policies and regulations regarding land use and transportation within the unincorporated parts of El Dorado County. Several proposed policy changes associated with the project, including densification of some existing land uses, will influence future development throughout the County. The following comments, based on the PRDEIR, concern the analysis and implications of these changes, so that impacts to the State Highway System (SHS) are disclosed and adequately mitigated for, protecting interregional travel and safety throughout the County.

***Comments***

- Table 3.9-1 (pages 3.9-5, 3.9-6) is missing the “Build Level of Service (LOS)” for the Segment 6
- Tables 3.9-8 (page 3.9-39) and 3.9-12 (page 3.9-44) list the minimum LOS of US 50 as F/E and state that the source of the minimum LOS used is the 2014 US 50 CSMP/TCR. As we have stated before and according to the 2014 US 50 CSMP/TCR, the minimum LOS for an urban freeway is E. Please change the F/E segments to E
- Page 3.9-31 references Caltrans’ concurrence letter provided to El Dorado County regarding their travel demand model (TDM) used for this analysis:  
“The TDM used to model traffic in the DEIR was revised in response to comments received during review of the Draft EIR. The County received formal Caltrans concurrence on the TDM on September 22, 2014. In its letter, Caltrans states that the TDM conforms to the

Ms. Purvines - Long Range Planning, El Dorado County  
 March 16, 2015  
 Page 2

state-of-practice in travel demand modeling, meets overall traffic assignment validation standards suggested by Caltrans and the Federal Highways Administration, and is an appropriate tool for the County's long range planning purposes. The revised TDM was re-run for all of the scenarios with the updated network requested by Caltrans."

Our concurrence letter solely addresses the base year model, which we reviewed and commented on several times. This letter should not be used to support the results of any model other than the base year model. Caltrans did not receive the opportunity to comment on or review future/cumulative scenario (2035) Travel Demand Models (TDMs). Caltrans did receive copies of an older version of the 2035 EDCTDM, however we were told specifically not to review or comment because the future model was still in draft form. The future scenario models used in this document do not have an associated concurrence letter from Caltrans. Any reference to Caltrans concurrence should be limited to the base model only.

Our concurrence letter also stated: "while the model as a whole meets validation standards, some areas of the model do not meet validation standards and/or generate unexpected outputs. Traffic Impact Studies based on these areas of the EDCTDM will require additional model improvements and post processing to achieve acceptable results." This language was added because there are areas of the base year model where the traffic assignment outputs do not accurately reflect existing conditions and should not be used verbatim.

- Table 3.9-13 (pages 3.9-53-3.9-57) shows the current and future scenario LOS of ED County roadways. We reject many of the LOS values shown for US 50 for, specifically those segments that differ substantially from the values documented the 2014 Corridor System Management Plan (CSMP)/Transportation Concept Report (TCR) (for base and future years) and California Performance Measurement System (PeMS) for existing values. The segment between the county line and El Dorado Hills Boulevard/Latrobe Road currently operates at LOS F according to both the US 50 CSMP/TCR and PeMS and will operate at LOS F in the future, without significant capacity increasing or operational improvements and/or reduction in demand. However, according to Table 3.9-13, this segment currently operates at LOS B and C and will operate at LOS D in the future. This LOS calculation implies that 2035 travel demand on this segment will reduce to lower levels than current demand even with the build-out of the general plan. Even with the parallel capacity increases, a 2035 projection LOS D for the US 50 segment between the county line and El Dorado Hills Boulevard/Latrobe Road is highly infeasible.

Considering the TGPA-ZOU build-out projections, the project will have a significant impact on multiple segments of US 50 between the county line and Missouri Flat Rd. Please note, while using the county's own TDM, Caltrans projects LOS F in 2035 for multiple segments on US 50. The PRDEIR should be revised to reflect the correct LOS calculations and any necessary mitigations included.

Ms. Purvines - Long Range Planning, El Dorado County  
 March 16, 2015  
 Page 3

Caltrans also rejects the LOS calculations for the super cumulative scenarios in Tables 5.2 and 5.3. The impact of this project is underestimated. The project will have a significant impact on multiple segments of US 50 in the super cumulative scenario.

- Caltrans does not agree with the “Method of Analysis” section (3.9-28) which uses Table 3.9-3 to calculate LOS in Tables 3.9-13, 5.2, and 5.3 (pages 3.9-53-3.9-57, 5-12, 5-14). The table homogenizes Highway Capacity Manual (HCM) freeway segment inputs which impact LOS calculations such as truck percentages, peak hour factor, physical geometry, and more importantly in this case terrain.

The conclusions derived from using this methodology contradict the intent of the table. The analysis within the document attempts to make operational and design determinations (what the facility should look like at build-out and which locations are significantly impacted by the project) for the SHS based on the build-out of the proposed project. See Table 3.9-3 note (page 3.9-29):

“Note: The planning thresholds shown in this table are provided for the purpose of assisting in the identification of locations where operational problems may exist and are based on information provided in the 2010 HCM and other industry sources. These values are not appropriate for making detailed or final determinations regarding operational or design considerations. Those determinations should only be made after a detailed operational analysis, consistent with current HCM procedures, and/or other design evaluations are completed.”

The LOS calculations for US 50 in the document should be calculated using a more appropriate methodology and realistic existing volumes.

- As indicated on page 5.2, the TGPA-ZOU does not include site specific development proposals. However, under Table 5.1 Cumulative Impacts, page 5-2 states that the County is considering applications for five large residential developments, referred to as "probable future projects", proposed in the western portion of the County. Table 5-1, Cumulative Projects, lists the following projects: Central ED Hills Specific Plan (SP), Dixon Ranch, Lime Rock Valley SP, San Stino, Village of Marble Valley SP, and the Folsom SOI. Together, these plans include a total of 18,050 to 21,340 homes. These developments are not part of the TGPA-ZOU, but are considered in the cumulative impact analysis. Further, it states that inclusion of the projects in this analysis does not imply that these general plan amendments will be approved by the County. The cumulative impacts analysis takes these project impacts into consideration in order to meet the intent of State CEQA Guidelines Section 15130 for a "worst case scenario".

The updated traffic model should include the cumulative projects for the 2035 (page 5-3) horizon year. If the County is including these projects in a worst case cumulative scenario, then the traffic demand model should also include these future projects. When Caltrans looks at development projects or State facility improvement projects, we always require a 20-year (or Design Year) forecast analysis. From the PRDEIR, it does not appear that the County is

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committed to including the above mentioned projects in the general plan, therefore potentially not committing to including the projects in their future model, so that State facilities can be accurately analyzed for a Design Year (cumulative scenario).

- Section 5.1 Cumulative Impacts: The State CEQA Guidelines Section 15355 quoted in the TGPA document: "...a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (page 5-1). The second bullet on page 5-3, regarding the determination of cumulative effects, states that the EIR is not required to analyze a cumulative impact to which the project would not contribute. Please explain how a cumulative scenario analysis of a project will not result in some form of cumulative impact (significant or not), especially when evaluated with other cumulative projects. Please explain how it is known that the project will not contribute to cumulative impacts if not analyzed. The statement appears to be less than accurate. The type of project being referred to should be specified in the PRDEIR.
- Page 5.3 states: "Cumulative effects that are less than significant are not required to be analyzed". Please explain how it is known that the cumulative effects of a project are not significant, before a cumulative analysis is completed. This statement appears to be inaccurate.
- Bass Lake Road is not included in Table 3.9-12 for 2035 and 2025 project impacts. Bass Lake Road should be included in this table given the major proposed developments located south of US 50 near Bass Lake Road.
- Bass Lake Road, south of US 50, is not included in Table 5.2 Cumulative Significant Impacts (super cumulative no project) on pages 5-14 through 5-26.
- Page 3.9-4, other references to Policy TC-Xa and the accompanying Table TC-2:
  - The last paragraph states that County roads are required to meet the standards set out in the General Plan. Caltrans reiterates, that US 50, SR 49, SR 153, and SR 193 are state facilities. They are maintained and operated by Caltrans and are not bound by County standards, with some exceptions.
  - The current level of service is inconsistently reported for these segments across the following tables: Table 3.9-1 (US Highway 50 2014 TCR/CSMP Report Data), Table 3.9-13 LOS Summary Table, and Table TC-2. Please provide an analysis of these segments (both US 50 and SR 49) that justifies the volume over capacity ratios shown on Table TC-2.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this project.

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If you have any questions regarding these comments or require additional information, please contact Eileen Cunningham, Intergovernmental Review Coordinator, at (916) 274-0639 or by email at [eileen.cunningham@dot.ca.gov](mailto:eileen.cunningham@dot.ca.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric Fredericks".

ERIC FREDERICKS, Chief  
Office of Transportation Planning – South

Cc: Scott Morgan, State Clearinghouse