



**DIAMOND SPRINGS AND EL DORADO  
COMMUNITY  
ADVISORY COMMITTEE**

El Dorado County Planning Services  
2850 Fairlane CT  
Placerville, CA 95667

October 11, 2021

Attn: Tom Purciel

re: Comments upon the adequacy of the Dorado Oaks Subdivision Draft EIR

Dear Tom,

This letter outlines those areas of the subject DEIR that we find to be deficient, inadequate, or incomplete with respect to addressing the impacts of the proposed project. This is by no means an exhaustive list, since we focused our attention to those areas with which we have some expertise, and upon our understanding of the community of Diamond Springs.

We will attempt to outline our comments consistent with the order in which environmental impacts are investigated in Chapter 4, "Environmental Setting, Impacts, and Mitigation Measures" of the Report.

**Section 4.4 Cultural Resources**

Our concern regarding this section ties primarily to how it interrelates to the Transportation section (4.13) and the Land Use and Planning section (4.9). The analysis under this section ignores the fact that the entire downtown area of Diamond Springs is historically significant, and is protected with a Historic Overlay established by the Board of Supervisors. The EIR did not discuss the Historic overlay, nor address what mitigations or design elements will be incorporated in the project to comply with the Historic Overlay. The proposed intersection improvements to Faith Lane/China Garden Rd. will significantly impact to the historic downtown whichever alternative intersection improvement is selected.

Option "A" proposes to demolish the historic Carpenter House, one of the few remaining intact historic buildings in town. ESA takes a cavalier approach to this impact by suggesting that no significant historic event occurred at the building, and no person of historic significance occupied the house. Therefore, if it is demolished take pictures of it first, and document its dimensions. Because of this adverse significant impact, the Committee finds that the Option "A" roundabout is not an acceptable alternative.

Further, they suggest that Option "B", with the offset traffic signals will miss the Carpenter House, therefore it has no impact. This conclusion is totally incorrect. The Prism Traffic Study acknowledges that with the offset traffic signals there will be road widening required, and additional right of way necessary, which will negatively impact several abutting properties. The EIR must quantify the impacts to these abutting properties due to right of way acquisitions as well as impacts due to the noise, light and glare, and air quality associated with traffic signals in the proposed locations.

Finally, the proposed use of Faith Lane as the primary entrance to this proposed subdivision significantly impacts the community identity and historic integrity of downtown Diamond Springs' that it is in violation of the Community Identity provisions of the El Dorado County 2004 General Plan. The EIR has failed to address this issue, and has provided no mitigations to lessen impacts.

#### **Section 4.5, Energy**

This EIR suggests that if you build 382 new homes in the same manner that has always been done, that some future State or Federal Climate Change actions will account for the increases in energy demanded by these homes, and will offset the greenhouse gases produced by these homes, and therefore the impact is less than significant. This is an absolutely unacceptable denial of the impacts of each and every land use decision on our climate. The droughts and extreme wildfires we have experienced in California, as well as the extreme weather, and flooding experienced in other parts of the country should make it clear to the most casual observer that we cannot continue to do things the way we have always done them, and assume that some future action in Sacramento or Washington D.C. will solve all of our problems.

The project, if approved, must have mitigation measures that require it to incorporate provisions in the design and construction that allow for a minimum, if not net zero, carbon footprint. Provisions such as the following should be included: all building layouts shall be positioned to maximize the use of solar electric panels on the roof, such that the buildings' annual power needs can be met by roof mounted (or nearby ground mounted) solar electric panels; all homes shall be hardwired to accommodate 240-volt electric vehicle chargers; all homes shall be all electric, and shall use high efficiency appliances, and solar or heat pump water heaters.

#### **Section 4.13, Transportation**

The use of a Vehicle Miles Travelled analysis was incorporated into CEQA to help find ways to reduce the impact of vehicles on the transportation system rather than measuring the impact of the transportation system on the experience of the driver. This came about from a recognition among Transportation Engineers that "You can't build your way out of congestion" so it is time to stop the ever-increasing expansion of urban sprawl, with accompanying longer driving distances and increased congestion. It is time to start looking at smarter development, compact development, mixed use development, transit

and pedestrian oriented development. All things designed to reduce dependency on single occupant vehicles, and ever-expanding freeways.

Upon review, this Committee has significant concerns regarding the VMT analysis for this project. The County of El Dorado apparently has a VMT base model that suggests that the average VMT per capita per day is 22.7 miles. The traffic consultant inserts Dorado Oaks into this baseline model sandwiched between the Fowler Lane residential community on the east, and the Deer Park residential community on the west (both of which are part of the baseline model), and concludes that this proposed project- which will have development types that are identical to the existing communities on either side, and which further proposes no travel demand reduction provisions,- will have a VMT value of 10.1 miles traveled per capita per day, less than ½ of the base line amount. This result is makes no sense, and consequently, the results of this EIR VMT analysis are so deeply flawed as to be invalid, which renders the EIR invalid.

The other portion of the Transportation Section addresses the more traditional "Capacity Analysis" aspect of traffic impacts. This analysis is equally flawed in that they focus most of their analysis on intersections along Missouri Flat Rd that are miles away from the project itself, and miles away from the location of the most severe impacts - downtown Diamond Springs. They analyze the Faith Lane/China Garden intersection and determine what should be no surprise to anyone that lives here, that it will operate at LOS F. What is not spoken to, and what is the critical impact, is what happens to the intersections of Pleasant Valley Road with Tullis Mine Rd., and with Center's Lane, and with Howard Circle, and with Odd Fellows Rd, and with North St, and with Diamond Meadows Way, and with all of the commercial driveways providing access to the numerous businesses located along Main St (Pleasant Valley Rd). Local residents and business owners have been complaining for years about the amounts of traffic through Diamond Springs, and notwithstanding the traffic volumes on Pleasant Valley Rd listed in the traffic study, there have been traffic counts in past years that have shown traffic volumes of 18,000 vehicles per day through downtown Diamond Springs. All of these side roads and driveways will be operating at LOS F with the addition of the traffic from Dorado Oaks. The EIR must identify the impacts to all of these intersections, and develop feasible mitigation measures.

The proposed mitigation of a roundabout results in unacceptable impacts to downtown Diamond Springs, and has not demonstrated that it would alleviate the problems to the remainder of Diamond Springs. While option "B" the offset traffic signals would have a lesser impact, it will require significant roadway widening, which will require additional right of way. The EIR must quantify what impacts will occur to the abutting properties, including the impacts of light and glare, noise, and air quality.

"C" Street, the project's northerly access to Fowler Lane must be constructed as a collector road, with curb, gutter, sidewalks, and bike lanes. The EIR has not addressed the impacts to Fowler Lane between the project entrance and the signalized intersection at Pleasant Valley Rd. To mitigate the impact of added traffic from this project that section of Fowler Lane must be widened to current County standards, and include curb, gutter, and sidewalks, with bike lanes.

#### **Section 4.16, Wildfire**

This summer's Caldor Fire, together with all the other mega-fires that have occurred in California in recent years have truly brought home the very real and current impacts of global climate change on our communities, and the fact that in many ways, El Dorado County continues to be inadequately prepared for major wildfires. Diamond Springs is a prime example of that situation. The proposed Dorado Oaks backs up to the Martinez Creek canyon to its south, a very expansive wild area that is totally overgrown with trees and brush, and if a fire gets going under the right conditions it could completely overwhelm most of Diamond Springs.

The proposed attached multi-family housing would be especially vulnerable to a fire-storm roaring through Diamond Springs. The EIR suggests that the project will have a narrow buffer zone around the project perimeter, a potential for a couple emergency access roads, and that together with existing building codes and local regulations there will be no impacts from this development. We suggest that the EIR consultants ask the residents of Grizzly Flats, or the residents of Santa Rosa how well that all worked.

The project includes a couple emergency access roads that can be considered as an "either-or" proposal, constructed with a narrow substandard cross-section with a gate at the end. These are treated as if they are to be a benefit to the future residents of Dorado Oaks. There are two fallacies with this proposal: the first was pointed out many years ago by the fire safety officer of the El Dorado Hills Fire Department. He pointed out that in an emergency, people are going to use the routes that they are familiar with, and that no one is going to put their life at risk by going down an unfamiliar road that may have a locked gate at its end. The second fallacy is that these emergency access roads are strictly for the benefit of future residents of Dorado Oaks. The community is safer, and evacuations can be carried out more efficiently when the community has a dense network of interconnected open public streets. Therefore, these emergency access roads should be considered as not just for the benefit of Dorado Oaks, but for the benefit of existing residents at the south end of Fowler Lane, and existing residents that live off of Antares Way in Deer Park Estates as well. These existing residents should be provided with the ability to escape through Dorado Oaks just as the residents of Dorado Oaks can escape out lower Fowler or Antares Way should it become necessary.

These emergency access roads must be constructed to County standards, and they must be open and available for the use of all residents should they be necessary in the event of an emergency.

Also, there is currently an effort underway to form a Diamond Springs Fire Safe Council. This project should be conditioned to join this Fire Safe Council, and an assessment incorporated into the subdivisions CC&R's or Zone of Benefit to help fund and maintain necessary fire safe improvements.

Also, the project must have a fire-safe plan that specifically analyzes the impacts to the project from a large wildfire in the Martinez Creek canyon, with mitigation measures to avert a wildfire disaster. The Firesafe Plan must include an evacuation plan through Diamond Springs that takes into account evacuees from outside of Diamond Springs travelling through town, and the resulting impact on Pleasant Valley Road. If gridlock occurs at the intersections with Pleasant Valley Road, no one will get out. The plan must outline the protocols necessary to assure that traffic will not be blocked at signalized intersections, so that all evacuees can get out in an efficient manner.

For all of the above reasons, we strongly urge the County to deem the Draft EIR inadequate and incomplete.

Thank you for considering these comments on the subject Draft EIR.

Sincerely,

Randy Pesses, Chairman

cc: Ms. Wendy Thomas, Supervisor, District 3