



City of Placerville

3101 Center Street, Placerville, California 95667

February 2, 2012

Roger Trout, Director
 El Dorado County Development Services Department
 2850 Fairlane Court
 Placerville, CA 95667

Re: *Diamond Dorado Retail Center – DEIR Review*

Dear Mr. Trout:

Thank you for providing the City the opportunity to comment regarding the Draft Environmental Impact Report for the Diamond Dorado Retail Center. The City respectfully submits the following comments on the DEIR for your consideration. Please do not construe the City's comments to imply opposition to the Diamond Dorado project, however the City believes that the environmental document should address the following comments and concerns:

Traffic

While the City acknowledges that the project proper has an insignificant impact on City intersections, the more appropriate table for analyzing the project is Table 4.11-11, which includes Existing Plus Approved Projects Plus Proposed Project Intersection Levels of Service in the 2015 timeframe. The City believes that this is the more appropriate litmus test to analyze traffic impacts for the project because, in all likelihood, the project will come online around that time or thereafter. In this regard, the City is concerned with the decline in the Level Of Service at the Sacramento Street/Pacific Street/SR 49 signalized intersection from LOS C to LOS D, and the inconvenience caused to the community by a near-doubling of traffic delay at that intersection. While the City agrees that LOS D is a generally acceptable Level Of Service, the traffic study falls short of its analysis in that *no* analysis is provided at two other key intersections in the vicinity—the unsignalized intersection of Cedar Ravine and Pacific Street, and the signalized intersection of Main Street/Pacific Street/SR 49.

Of particular concern is the impact on the roadway system at the signalized intersections of Sacramento Street/Pacific Street/SR 49 and the aforementioned Main Street/Pacific Street/SR 49. Absent the analysis of the latter of the intersections, one cannot judge the impact of the 2015 traffic condition whether or not it disrupts traffic flow. For example, in the short commercial corridor on SR 49 between the Main Street/Pacific Street intersection and the Sacramento Street/Pacific Street intersection, it may be that traffic

degradation does occur, and that mitigation may be warranted, such as an upgrade to a fully synchronized signalization system.

In light of the discussion above, the City respectfully requests that a response to the aforementioned matters be addressed.

General Plan Consistency

The DEIR references policies 10.1.5.5, 10.1.9.3 and 10.2.4.3 on pages 4.8-19 and 4.8-20 of the Economic Development Element of the 2004 El Dorado County General Plan. The City acknowledges that the above policies are used to bolster the statement on page 4.8-20 which reads,

"By designing and zoning the site for commercial uses, and developing the DDRS, the County would be taking steps to achieve the economic growth outlined in the County's General Plan. The Economic Development Element of the General Plan indicates the County's intent to provide expanded shopping opportunities to the residents of El Dorado County while improving retail sales capture within the County and promoting job generating land uses."

However, the Economic Development Element contains a relevant objective and two additional policies appropriate for discussion that do not appear to be mentioned in the DEIR. The policies that the City refers to are found on pages 215 and 216 of the El Dorado County General Plan and state as follows:

"Objective 10.2.7: Coordinate land uses with other jurisdictions. Resolve conflicts with other jurisdictions regarding the location of revenue-generating land uses."

"Policy 10.2.7.1: Large commercial or industrial projects located in the County but affecting a nearby city should be planned in cooperation with that city so that potential negative impacts can be effectively mitigated."

"Policy 10.2.7.2: Establish a joint County/City task force to develop complementary land use designations, zoning, transportation, and funding plans to protect existing and to encourage new commercial, industrial, and research and development projects in the Missouri Flat—Placerville Drive area."

In light of the above, it appears that the issue of General Plan Consistency should be further addressed in regard to the above objective and policies, and the City respectfully requests the same.

The City is concerned regarding the overall impact the project may have upon Placerville, and that these impacts may be significant and cumulatively considerable. The crux of the City's concern relates to other recently-constructed and pending commercial projects in the greater Placerville area, including the Missouri Flat Corridor, and the recently revived Crossing at El Dorado development project. The environmental document should at least include a

meaningful analysis with respect to the aforementioned projects in this regard, and potentially mitigation measures to address these impacts.

There is a concern that the magnitude of the existing and proposed commercial development could result in significant increase in commercial vacancy rates in Placerville, thereby causing a blighted physical impact upon the community, and the gradual erosion of City resources for the provision of necessary and essential services funded via sales tax.

Thank you for the early consultation on this matter and for providing the City the opportunity to comment. Please feel free to contact me if you wish to discuss this matter further.

Sincerely,



M. Cleve Morris
City Manager

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