

## Responses to Comments on the 10/2008 Versions of the Land Development Manual & Standard Plans

Page	Heading / Topic	Comment	Response
	General Observations	<p>Adoption of the Manual is ill-timed given certain aspects of the General Plan needing amendment.</p> <p>Given the County's budget crises, resources are limited and the Manual should be downgraded in priority. Why is the Manual being updated at this particular time?</p> <p>The Manual is repetitive as currently organized by departmental functions; consider re-organizing it according to stages of development.</p> <p>The Land Capability Report and tentative map process have ballooned in scope or detail. This process is becoming more expensive as proposed and works against economic development.</p> <p>Design standards are excessive. Provide explanations or justification on how the standards have been determined.</p> <p>The goal of the DISM update should be creating the most applicant-friendly design manual in the region.</p> <p>The Manual lacks dispute resolution procedures for an applicant to elevate a policy or procedural disagreement to a decision-making body as recommended by the Ad Hoc Committee. The Committee also recommends that in addition to the current time and material basis for processing Planning and Transportation applications, develop flat rate fees for the various ranges of applications so an applicant can have the option of processing on a T &amp; M or fixed fee basis.</p>	<p>The process of updating the DISM has helped uncover questions related to the General Plan that may require policy changes. This project was started in the fall of 2007 prior to the rapid decline of the County's fiscal situation. The General Plan specified the manual was to be updated within 2 years after the General Plan was adopted in 2004.</p> <p>We are removing some of the duplications.</p> <p>The LCR has been removed and replaced by a short section which refers the reader to see the applicable application forms on the County's website.</p> <p>We have added more referencing to the applicable laws, General Plan, etc., as well as additional advisory information.</p> <p>Agreed.</p> <p>Dispute resolution procedures and flat fees were addressed on 12/9/08 in the Board action on the Ad Hoc Committee's recommendations. Also, note, there is an appeals process in place, described in the manual.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
<b>CHAPTER 1: INTRODUCTION</b>			
<b>1.4 GENERAL PROCESS STEPS FOR DISCRETIONARY PROJECTS</b>			
General		The process description should remain in as it is important to the design community.	Agreed.
1-7	1.4.1 1. Pre-Application Meeting (Optional)	This should be a required meeting. However, there is concern based on past experience that decisions and/or recommendations made during this meeting be documented. Any decision made during this meeting should be reviewed by Department Managers and approved prior to the applicant working with the understanding that the decision is final.	This is an optional meeting but strongly encouraged.  DSD is working on improving the consistency of responses from the Planning Department to applicants in the Pre-Application meetings.
1-12	1.4.2 Step 2: Detailed Improvement Plans Submittal and Review	B. Requires payment of plan check fees. Plan checking should be allowed with outside plan checkers. This allows applicants a choice and competition of cost.	This is an administrative issue that should be addressed with the appropriate Department; this does not belong in the design manual. Generally, the applicants already have the option to have consultants contracted to the County doing plan check or inspection.
1-12	1.4.3 Step 3: Project Construction and Inspection	Requires payment of inspection fees. Applicants should have a choice of hiring certified outside inspectors for a project. Outside inspectors are aware of all codes, and they are bonded, insured, and liable. The choice will make inspections more competitive and insure the improvement is completed correctly. It will also be a cost savings for the County payroll.	See above response.

Page

Heading / Topic

Comment

Response

<b>1.5 DESIGN WAIVERS</b>			
1-13	1.5 Design Waivers	This section should be moved to an Appendix.	Comment noted. No change made.
1-14	1.5.3 Guidelines for Making Design Waiver Findings	“Design waivers are to be granted only when, because of special circumstances applicable to the property, including <b>size, shape, topography, location or surroundings</b> , the strict application of the standard(s) deprives such property privileges enjoyed by other property in the vicinity under identical zoning.” This statement limits a property owner’s ability to determine the highest and best use of his property and dictates more of the same subdivisions as those in the immediate vicinity. In addition to size, shape, etc., the design waiver process should not preclude applicants from utilizing creative development techniques, smart growth principles, and self-sustaining, compact development.	We disagree – Based on Title 16, Finding 1 precludes anything other than the peculiarities of the site. However, these suggestions can be handled through the Planned Development process.
1-15	1.5.4 Process	C. Two tentative maps, one with design waivers and one without: “An exception can be granted by the DSD Director or at a pre-application meeting if the waiver being requested would not result in a material change to the tentative map.” The term material change is vague and too open-ended. Please clarify situations where an exemption would be granted and describe the process an applicant must undertake to seek an approved waiver (e.g. timing - - before submittal or during project processing). An option should be included to allow for moving an item to a higher level (PC or BOS) when staff and applicant cannot come to terms.	This section has been updated; see changes and also refer to page 1.4.1 for a description of the appeals process.



Page

Heading / Topic

Comment

Response

<b>CHAPTER 2: LAND CAPABILITY REPORT AND SUBDIVISION STANDARDS</b>			
<b>2.3 SUBDIVISION PROCESS</b>			
2-3	2.3.1 Tentative Map Required	<p>B. "Second, the applicant ensures that all of the subdivision improvements are completed, <u>bonded or other security provided</u>, and all conditions of approval are satisfied." Add the underlined text to maintain consistency with the Subdivision Map Act.</p> <p>C. "Third, the applicant files a Parcel Map (for four or fewer lots) with the County Surveyor, or a Final Map (for five or more lots) to Planning Services and subject to <del>Board of Supervisors</del> <u>approving bodies</u>' approval."</p>	<p>Change has been made with slight alteration.</p> <p>Change made to clarify.</p>
2-4	2.3.4 Applications for subdivision-related actions	C. Time Extensions: The draft Manual indicates up to an additional 5 years. SB 1185 added a 1-year discretionary term for certain projects for a total of 6 years.	Change made.
2-4	2.3.5.1 Preliminary Map or pre-Application Submittal	<p>"The Tentative Map process begins with a <b>required</b> Preliminary Map or Pre-Application submittal..." This statement is inconsistent with the Pre-Application process described on page 1-8 which indicates it as optional.</p> <p>"Larger subdivision proposals (such as those of 50 lots or more) should start with a Preliminary Map application for a more comprehensive evaluation rather than the Pre-Application process." How was the trigger of 50 lots determined? Experienced applicants (at their option) should not be burdened with an unnecessarily long processing time. Discretionary processing is already expensive and time consuming.</p>	<p>Text has been clarified.</p> <p>Explanation of the 50 lots or more has been added.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
2-5	2.3.5.2 Application Submittal	B. Fee schedule: Sometimes the fees posted to the website are not up to date which causes problems for those submitting applications with a pre-cut check and the counter planner who must manipulate the database. All website information, including fees, application forms and checklists, should be current.	Sentence added to note that the applicant can get a fee quote ahead of time.
2-5	2.3.5.4 Staff Report/CEQA Documentation	“The applicant...will receive a copy of staff’s recommendation and conditions prior to the public hearing.” Based on experience, applicants don’t always have an opportunity to review a draft staff report and receive Planning’s conditions prior to it being finalized and set for hearing. Prior to the release of the staff report for hearing, the applicant should have an opportunity to review the draft for accuracy and concurrence with staff’s analysis. Once a staff report is finalized, amendments must be issued or the staff report goes on record containing errors. Like all other agencies, applicants should receive Planning’s proposed conditions far in advance of staff report issuance and given an opportunity to respond. Unfortunately, this hasn’t always been the case. It is also very important that project planners ensure that all comment letters are distributed to the applicant prior to drafting of the staff report.	Comment noted. No changes made.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
<b>2.4 LAND CAPABILITY REPORT (LCR) FOR TENTATIVE MAPS</b>			
	General Comments	<p>This section has significantly expanded in scope from the prior DISM. As the response to comments table indicates, the changes are largely directed by the new General Plan and the standards proposed for LCR's will have a significant increase in the cost of preparing tentative maps. See <b>EXHIBIT B</b> for sample project costs for a hypothetical residential development in the El Dorado Hills Community Region and the discussion contained in the related cover letter.</p> <p>As proposed, the Land Capability Report is redundant and unnecessary since all of the requested information is either provided on the map materials or in the supporting consulting reports required by the Tentative Map Checklist. The purpose of the Land Capability Report as it stands in the current DISM is only required for projects dependent on well and septic systems and should remain so.</p> <p>The Land Capability Report requirement needs to be clarified. It is not necessary in some situations but critical in others.</p>	<p>The LCR has been replaced with a short reference to the application forms on the DSD website. Application forms are being updated by DSD. Application forms will spell out the necessary requirements for each type of project.</p>
2-7	2.4.1 Scope of Work and Distributions	<p>A.1. Six copies B. Distribution to EMD, DOT, RCD, Fire, and Water/Sewer Districts:</p> <p>Given the significantly expanded scope of the Land Capability Report (LCR), a project could potentially have a dozen reports or studies. A LCR could easily be several inches thick and requiring six copies becomes unnecessarily</p>	<p>The LCR has been replaced with a short reference to the application forms on the DSD website.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		expensive to reproduce. Furthermore, it doesn't make sense to distribute reports to agencies that have no jurisdiction (e.g. a traffic study to RCD, a drainage report to AQMD, a wetlands report to fire). Six copies of each report are wasteful; staff should determine the minimum number copies they need for each report and distribute only those reports to agencies having jurisdiction. Why is an electronic copy of the LCR needed? No other electronic files are provided at tentative map stage.	
2-9	2.4.3 Special Development Considerations	<p>A. Phasing Plan: "If development is to be phased, show the extent of each phase..." This is inconsistent with Subdivision Map Act Section 66456.1 (Multiple final maps on one tentative map). In providing a phasing notice, a subdivider is not required to define the number or configuration of the proposed multiple final maps.</p> <p>B. Planned Development. The Manual should mention that this section is under County review.</p> <p>C. Development/Building Envelopes: Requiring this information at tentative map stage is too detailed and increases the cost of discretionary applications before an applicant has any assurance from County decision makers that he may move forward with his project. This can be handled at a later date secured with a condition of approval.</p>	The LCR has been replaced with a short reference to the application forms on the DSD website.
2-9	2.4.4 Fire Safe Plan	A fire safe plan meeting PRC # 4290 and #4291 is required. For any project not adjacent to wildland areas, this requirement is excessive. This section should only apply to projects adjacent to wildland areas.	The LCR has been replaced with a short reference to the application forms on the DSD website.
2-9	2.4.5 Noise Analysis	The way this section reads is that an acoustical analysis will be required under most	The LCR has been replaced with a short reference to the application forms on the DSD

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>circumstances. However, it is the exception rather than the norm that a new project will “generate noise levels incompatible” with existing developments, or be placed “near sources of high noise levels” (GP Objective 6.5.1). Therefore, rather than trying to get a waiver to perform the analysis (D.), this section should require an acoustical analysis <u>only</u> when the possibility of a noise problem will be created with the new project.</p> <p>Also, what is the definition of “adjacent” in paragraph C.?</p>	website.
2-10  2-11	2.4.6 Preliminary Drainage Report	<p>A. Pre-Project Analysis, Items 1-5: Requiring this information at tentative map stage is much too detailed and increases the cost of discretionary applications before an applicant has any assurance from County decision makers that he may move forward with his project. See <b>EXHIBIT C</b> for recommended replacement language.</p> <p>E. Upstream Development: Delete this paragraph. It’s vague, problematic and infeasible for most projects.</p>	The LCR has been replaced with a short reference to the application forms on the DSD website.
2-12	2.4.7 Preliminary Grading Plan	<p>A2. Estimate truck traffic volume and proposed route(s): How far off-site?</p> <p>“See the DOT website for the current version of the “Preliminary Grading Plan Checklist”. Could not locate the form; please provide a more specific web address.</p> <p>Add provisions for borrow sites and temporary stockpiles.</p>	The LCR has been replaced with a short reference to the application forms on the DSD website.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
2-12	2.4.8 Snow Removal Storage and Solar Opportunities	<p>A. Suggest replacing snow <b>removal</b> with snow <b>storage</b>; having adequate storage area is of importance rather than the removal technique.</p> <p>B. Solar Access: General Plan Policy 5.6.22 is very specific that new subdivisions should include these design considerations <b>when feasible</b> (emphasis added). Consistent with this policy, a Solar Opportunities Report should only be provided <b>when feasible</b> and should not be mandatory with every project.</p> <p>As an alternative to the solar opportunities report, which may be time consuming and costly, provide a checklist to the applicant/engineer to list which one or more of the standards cited in 2.5.2.B 1 a-g will be incorporated into the subdivision (<b>as feasible</b>, see Subdivision Map Act Section 66473.1).</p>	The LCR has been replaced with a short reference to the application forms on the DSD website.
2-13	2.4.9 Soils and Geology	<p>B. Providing soils reports at tentative map stage is premature and increases the cost of discretionary applications before an applicant has any assurance from County decision makers that he may move forward with his project.</p> <p>Government Code Section 66490 does not specify when the soils report should be provided or that the soils report be submitted with the tentative map, but states it shall be required "for every subdivision for which a final map is required."</p> <p>As historically required in El Dorado County, any and all geologic/geotechnical reports should be required at the time of the Improvement Plan</p>	The LCR has been replaced with a short reference to the application forms on the DSD website.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>submittals prior to the final Map.</p> <p>D. Building Services Technical Policy (copy provided as <b>EXHIBIT D</b>): How does this relate to the tentative map process?</p> <p>E.1 “Where groundwater may be present and intercept cut slopes in excavation or fill slopes in embankment, determine whether the amount of subsurface water is likely to affect the stability of the slopes and design them accordingly.” It is very difficult to determine where groundwater will occur, let alone how much. This should be handled by a change order and not addressed here.</p>	
2-13	2.4.10 Storm Water Quality	<p>Why is storm water quality compliance required at the tentative map stage? This increases the cost of discretionary applications before an applicant has any assurance from County decision makers that he may move forward with his project.</p>	<p>The LCR has been replaced with a short reference to the application forms on the DSD website.</p>
2-14	2.4.11 Traffic Analysis and Road Design	<p>General Comment: Efforts should be made to raise the threshold for requiring traffic studies. Also, efforts should be made to:</p> <ol style="list-style-type: none"> <li>1. Hire a DOT Traffic Engineer who coordinates, reviews and approves traffic studies. The current system where the applicant hires a consultant, then pays a fee for the counties’ additional outside consultant, whose work is then reviewed by DOT staff is time consuming and unduly expensive.</li> <li>2. DOT should set up a database for information derived from traffic studies, make it available to the public in order to</li> </ol>	<p>The LCR has been replaced with a short reference to the application forms on the DSD website.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>avoid duplication and lower costs to all.</p> <p>“Before initiating a traffic study, complete and submit an <b>initial project information form</b> to DOT.” Is the bold text meant to direct users to the “Phase 1 Traffic Impact study Initial Determination”? If so, use the same language so users can find the information.</p> <p>A. Traffic Volume: Traffic volumes are requested on the tentative map or a circulation map to “determine the impacts on intersections and to determine if the proposed improvements will be adequate to address the volumes” (as stated in the response to comments table). This information is included as an exhibit to a traffic study. It doesn’t make sense to duplicate on a second exhibit and unduly increases the cost of preparing the tentative map.</p> <p>B. Dead End Roads / Secondary Access C. Road Alignment</p> <p>What do these items have to do with the LCR? This information is reflected on the tentative map itself. Delete items B. and C. For these reasons, delete the term Road Design in the heading.</p>	
2-15	2.4.12 Oak Canopy Protection and Mitigation	<p>“An <b>Oak Tree Survey</b>, Preservation and Protection Plan is required for all <b>high density and multi-family residential, commercial, and industrial</b> Tentative Maps and projects. See the OWMP for details.” This phrase is not consistent with the applicability of the OWMP as stated in</p>	<p>The LCR has been replaced with a short reference to the application forms on the DSD website.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>the OWMP. Page 5 of the OWMP indicates development, as affected by the OWMP, is <b>any structure</b> requiring a building permit or grading activity requiring a grading permit. GP policy 7.4.4.4 applies to parcels that are less than or equal to one acre with at least 10% oak canopy cover or greater than one acre with at least 1% oak canopy cover. If parcels do not meet one of these two criteria, 7.4.4.4 and the OWMP do not apply.</p> <p>Additionally, a <b>Tree Survey</b> is not the only method of determining canopy loss as defined by the OWMP. Page 13 of the OWMP (Item 2) says aerial topography or another approved method may be approved. The Manual is proposing language in conflict with the OWMP and should instead refer readers to document to investigate their options.</p> <p>C.1.a. "The replacement plan shall identify the numbers and types of oak trees to be removed as part of the development improvements including...future residential construction." For subdivisions with lots that are proposed to be sold vacant and individually graded, it is impossible to determine the numbers of individually impacted oaks from home construction at the tentative map stage. This standard is excessive. Readers should simply be referred to the OWMP to investigate their options.</p>	
2-17	2.4.15 Wetlands Report	"For <del>small</del> projects where no identified wetlands will be affected..." Delete strikethrough; <b>any</b> project not affecting wetlands should not be required to submit further analysis.	The LCR has been replaced with a short reference to the application forms on the DSD website.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>F. 100 foot and 50 foot septic setbacks: Move to Section 2.4.14 (Individual Water and Waste Discharge Area).</p> <p>G. Show riparian setbacks required by...GP policy 7.3.3.4: This is an excessive standard if applicants are successful in obtaining Corps authorization to place fills under the terms of a 404 Permit.</p> <p>Any and all setback requirements should relate to the Corps guidelines or an approved reduced setback as outlined in the Interim Guidelines. The arbitrary increase in standards per the Interim Guidelines is punitive. The Corps setbacks are more than adequate.</p> <p>Is the definition for wetlands needed?</p>	<p>The definition for wetlands has been updated in the Glossary in Chapter 7.</p>



<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
2-23		<p>pages forward on page 2-26, the reader is informed that Hillside standards do not apply to mass pad graded lots. For consistency and clarification, the underlined text is recommended.</p> <p>B.9 Vehicular Access: In addition to the two exceptions cited on page 2-23, there may be prior existing physical or approval conditions that would make it impossible to design without vehicular access onto a county maintained road, and therefore prevent reasonable use of the property. In those circumstances an additional exception should be provided.</p>	Change made.
2-26		B.9.a. Explain how the 1,000 ADT threshold has been established. 1,000 ADT is only 100 houses. Sacramento County uses a 2,500 per day threshold. Consider an ADT threshold in context of case-by-case projects. If a house is on a narrow two-lane rural road, then the 1,000 ADT may be appropriate, because a car would have to back into a travel lane to get out of the driveway.	Change made.
2-27		<p>If a house is located on a road with two lanes, on-street parking, and curb &amp; gutter, then the 2,500 ADT threshold is more appropriate, because a car can back into the parking lane and then enter the travel lane.</p> <p>G. Hillside Design: Item 1a recites GP policy 2.3.2.1 which says disturbance of slopes 30% or greater should be <b>discouraged</b>, while item 1b recites GP policy 7.1.2. which says disturbance shall be <b>prohibited</b> on slopes exceeding 30%. These policies are inconsistent and should be unified.</p>	General Plan Policies cannot be changed to be consistent inside of the Design Manual.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		G.2.a. Lot Dimension Standards / Lot Frontage: Frontage requirements for 31-35% and 36-40% are inconsistent with the maximum of 30% lot slopes.	Explanation added to address this suggestion.
2-29	2.5.3 Streets, Street Lighting, Sidewalks, Bike Lanes	A.1. Streets / General Policies	We encourage traffic calming designs in areas in which it makes sense. The LDM is not meant to preclude those. The discussion about the conflict of providing wider streets and protection of pedestrian safety needs to be addressed at the policy level with the Board of Supervisors and the community.  Change made.  DSD will address this with the Board of Supervisors in 2009, asking for guidance as to what this General Plan Policy means.
2-30		c. "New streets...shall be designed...consistent with the needs of emergency access, on street parking, and vehicular and pedestrian safety." A discussion needs to take place about the conflict of providing wider streets and protection of pedestrian safety. Traffic calming designs need to be considered.  d and e: These items describe Measure Y and the voters have approved modified language effective January 1, 2009. Update this section.  f: Applicable Level of Planning: Explain the rationale and/or provide sample circumstances to which this would apply. Is this intended to target properties that are clearly underutilized? How does this standard affect properties that cannot reach the minimum density given physical and General Plan constraints?	
2-31		A.2. General Standards for Streets  c.i. Please cite the government code section or methodology for establishing the 500 foot trigger. This appears inconsistent with 3.b.vi on page 2-33.  c.ii. "Secondary access is required where there are more than 12 lots on a dead end road." This standard has been reduced from 24 lots. Please	

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
2-32		<p>cite the government code section or methodology for this trigger.</p> <p>3. Standards to Secondary Access</p> <p>a.i. For residential subdivisions of five or more lots, secondary access is required and must be ¼ mile from the primary access street for those times when a propane tank overturns. Yet, for non-residential and multi-family projects where two access roads are required (3.c.iii, pg. 2-33), the required spacing is ½ the length of the maximum overall diagonal dimension of the property or area to be served, measured in a straight line between accesses. The later is more logical.</p>	Updated for consistency.
2-33		<p>Residential projects over 5 lots but of relatively small acreage or with unique property boundaries may be physically unable to provide the ¼ mile spacing and therefore reasonable use is denied. Primary and secondary accesses shall be to through roads unless looped circulation is otherwise provided for and 3.c.iii shall apply to <u>all</u> projects. Propane trucks have the same probability of overturning in a residential neighborhood as they do traveling by non-residential and multi-family residential.</p>	
2-34			
2-35		<p>b.ii. <u>“For properties adjacent to wildland areas, an acceptable fire safe plan...”</u>. The underlined text is recommended for clarification. A fire safe plan should only be needed if a subdivision is adjacent to wildland areas. Otherwise, all other lots are subject to PRC # 4290 and # 4291 for defensible space requirements.</p> <p>c.iv. “Additional driveway and road requirements</p>	<p>This is a requirement by the El Dorado County Fire Protection Officers.</p> <p>This is a requirement from the 2007</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>may be required when building height(s) exceed 30 feet.” Why is 30 feet the trigger when the zoning ordinance allows non-residential and commercial building heights of 50 feet?</p> <p>B. Street Lighting</p> <p>1 and 2: “Street lighting may be required...”. Define the circumstances when lighting is required.</p> <p>C. Sidewalks, Pedestrian Paths, and Bike Lanes</p> <p>5.a. Requiring sidewalks on both sides of the street is excessive and unnecessarily increases project costs. Please cite the government code section, General Plan policy or research that dictates such a standard.</p> <p>5.a.i Sidewalk width: Since 4 foot sidewalks are typically asked for and require a design waiver that is usually approved, the standard should be reduced to 4 feet, unless within 500 feet of schools, parks, and other public or community facilities.</p> <p>5.b. Sidewalks and ADA: Sidewalks that follow street grades that are in excess of ADA requirements will be difficult or impossible to build.</p>	<p>California Fire Code and its amendments as adopted by the El Dorado County Fire Protection Districts, ratified by the Board of Supervisors in February, 2008.</p> <p>Change made to clarify.</p> <p>Comment noted. This requirement has been deleted from the LDM; see the standard plans instead.</p> <p>See the standard plans.</p> <p>We need to follow the Americans with Disabilities Act (ADA) and its guidelines.</p>
2-40	2.5.6 Fire Protection and Other Emergency Services	B.6. Water Supply for subdivisions of five or more parcels: Clarify this section pertains to lots not served by public water.	Water supplies, both private and public, need to meet fire flow requirements.
2-44	2.5.12 Critical Habitat, Archaeological and Cultural Resources,	A.1. “...Mitigation shall be defined in the INRMP...” What happens to projects in the meantime while the INRMP is being developed and adopted? Are projects put on hold?	A.1. is directly from the General Plan. See 2.5.12 A.3. (new section #2.5.12.1. C.) for instructions on what to do in the interim.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
2-45	and Native Tree Protection	A.2. "Wetland delineation <b>may</b> be required with application submittal...". Isn't this a required item on the submittal checklist?	Paragraph has been modified to delete this sentence.
2-46		B. Wetland Preservation Standards should be the same as the Corps of Engineers.  Archaeological and Cultural Resources	Paragraph has been modified.
		C. "Protection or mitigation of archaeological and cultural resources is <u>may be</u> required when found on-site." Protection or mitigation should only be required if the resource is <b>impacted</b> and determined to meet eligibility criteria under the National Register of Historic Places.	Change made.
2-47		D1. "Oak tree surveys and protections plans <del>are</del> <u>may be</u> required with application submittal." The OWMP offers applicants flexibility under Option A or Option B.	Change made.
		D.2.b.i. "Six foot tall temporary fence to protect oaks..." A six foot fence is excessive. The standard height of orange construction fencing is 4 feet and is sufficient to alert workers of a protected area.	Modified to say that the minimum height be 4 foot fence, but higher fencing can be used.
		D.2.b.iv. "Only dead, weakened, diseased, or dangerous branches shall be removed, and only by <u>the recommendation of</u> a licensed arborist." The underlined text is recommended; an arborist recommendation should be sufficient without requiring him to physically perform the work. This standard should be expanded to include fire safe plans that typically recommend trimming	Sentence has been modified.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>understory up to 8 feet from ground level.</p> <p>D.2.b.v. "Hose off all dust from foliage of oak trees once every week during the construction project." Where is this standard derived? This standard is not feasible for trees over 15 feet tall or for multiple acre projects. Implementation of dust control measures will take care of this concern.</p>	Sentence has been modified to provide more discretion to an arborist.
2-49	2.6 Multi-Family and Non-Residential Development Standards	Why is this a separate section? 2.6.2.E requires compliance with Section 2.5 (Subdivision Standards). Because of the circular reference, it seems this section should be omitted and combined with Section 2.5 clarifying that 2.5 applies to all applicable projects.	This section has been deleted.

Page

Heading / Topic

Comment

Response

<b>CHAPTER 3: SEWAGE, WATER REQUIREMENTS AND AIR QUALITY</b>			
3-1	3.1 Introduction	Is there some way to reduce the reporting requirements and therefore the costs, at the Tentative Map stage?	Text has been updated - revised the basic requirement for proof of sewage disposal reducing the testing to 10% of the lots, from 100% of the lots.
3-14	3.9.5 Water testing for all Final Map Approvals	A.2. This section refers the reader to Chapter 2, Section 2.5.7 (Water Supply for Parcels Not Supplied with Water by a Public Agency). 2.5.7 refers the reader back to 3.9.5 without offering any new information. A circular reference has been created and needs remedy.	Change has been made.
3-15		The 2-year time limit for production capacity should be eliminated. There is no need to re-test.	Well production can vary and change over time. The majority of the production reports that are submitted are from air lift testing which is considered an indicator test and not a long term test. Although they appear to give a good estimate of the well production at the time of drilling, EMD set a limit on the acceptability of the report to a 2 year time period unless additional information is provided by the well driller or pump contractor that provides documentation that the well production has not changed since the previous production test. Other counties surveyed by EMD have a one year time limit on well production testing.
3-14, 3-5	3.9.1 B. 9. Water, and 3.4 Community Sewage Disposal Systems	Management for operation and maintenance of water and wastewater treatment systems. An entity needs to be formed to insure that requirements are met for on-going operations. Well water treatment systems are available for	Text has been updated - removed the requirement for a public entity like EID from being responsible for the operation of a community sewage disposal system, and added a section in the water requirements to allow for

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		individual or community wells but the current draft manual does not allow for their use.	an entity to be created to oversee the individual water supplies if contamination was found in the ground water.

Page

Heading / Topic

Comment

Response

<b>CHAPTER 4: TRANSPORTATION</b>			
<b>4.2 DISCRETIONARY PROJECTS</b>			
4-4	4.2.2 Step 1: Application Submittal, Project Review and Conditioning	This section describes the discretionary review process which is a repetition of Chapter 2. It should be integrated with the Planning Section.	The process descriptions in this section are unique to DOT and flow from the process described in Chapter 2.
4-5		TIS Flow Chart: Based on experience, it appears a box is missing between “Applicant hires Traffic Engineer to Prepare TIS” and “Applicant submits TIS to DOT for review”. A box should be added for “Traffic Engineer submits TIS scope to DOT for approval”.	The flow chart has been updated.
4-6		A2. “Consistency with the General Plan’s Circulation Elements <u>including revised Measure Y approved by the voters November 2008.</u> ” Add the underlined text so readers are aware Measure Y has been revised since the adoption of the General Plan.	The manual has to be consistent with the General Plan regardless of policy changes made by the public through the election process. The changes driven by the passage of Measure Y will ripple through the General Plan through the amendments carried by Measure Y.
4-7	4.2.3. Step 2: Detailed Improvement Plans Submittal and Review	4.2.3.1.D. “ <u>At initial submittal, the plans must be substantially complete, signed, sealed and marked “preliminary; not for construction” until the plan check process has been fully completed.</u> <u>At final plan check,</u> the plans shall be complete, signed, sealed and ready for construction.” Plans shouldn’t need to be signed and sealed at the preliminary stage.  This section discusses the general process for preparing improvement plans. In reality, the plans cannot be ready for construction at first submittal because they haven’t gone through the plan check process which most always leads to	Change made.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
4-9		<p>changes as directed by the plan checkers. The underlined text is recommended to clarify the plan check process.</p> <p>Recommend adding Paragraph E: <u>“Applicants have the option to retain outside plan check and outside inspection services upon request. Outside plan checkers and inspectors shall be licensed, insured, and bonded, and at the expense of the applicant.”</u> This option is suggested similar to Planning Services’ option to hire outside project planners. Applicants can benefit from outside services to expedite their projects when County staff time is limited and lower project costs by paying a more competitive rate.</p> <p>4.2.3.2 Initial Submittal</p> <p>“It is strongly recommended that you make an appointment to submit your detailed improvement plans to DOT.” Consider creating an intake checklist similar to Planning Services to ensure complete submittals are received.</p>	<p>This is an administrative issue that should be addressed with the appropriate Department; this does not belong in the design manual. Generally, the applicants already have the option to have consultants contracted to the County doing plan check or inspection.</p>
4-10		<p>B.11. “Traffic signal plans and notes (sealed and signed)”: At initial submittal, the plans should be marked “preliminary; not for construction” until such time as the final plan check process has been completed.</p> <p>B.13. “Retaining wall plans, <del>profiles</del> and <u>typical</u> cross sections”: Drawing entire cross sections/elevations of every retaining wall, especially for mass pad graded lots, is excessive and unnecessary make-work. Call outs for top</p>	<p>Agreed. There is already a sample on page 4-9.</p> <p>Change has been made.</p> <p>Sentence has been clarified.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>and bottom wall heights in plan view is sufficient for construction purposes; qualified plan checkers can visualize the extent of the walls and they do not need entire elevations to complete their plan check process.</p> <p>B.25. "New aerial surveys": Who decides when and under what circumstances when new surveys are needed? Given the cost to the applicant to perform new surveys, this information is proprietary to the applicant and should not be provided to the County in any form other than on the improvement plans themselves.</p> <p>C. Engineers Estimate: "The engineers' estimate shall be signed and sealed <u>prior to final approval.</u>" Engineer's estimates go through a number of revisions; having multiple versions signed and sealed by the engineer is confusing. The <b>final</b> estimate should be signed and sealed.</p>	<p>Sentence has been clarified to apply to road improvements.</p> <p>Change made.</p>
4-10	4.2.3.3. Improvement Agreements	<p>A. "If an improvement agreement is required, it should be initiated with DOT <b>as soon as feasible.</b>" In reality, the improvement agreement process is initiated toward the end of final plan check once a final engineer's estimate has been approved.</p>	<p>Because of the lead time in processing agreements, we encourage applicants to work with DOT to start the drafting of these documents as soon as feasible.</p>
4-11	4.2.3.5 Plan Review	<p>A. "...Staff will review the plans and call the applicant for an appointment to go over Staff's comments." This should be an option for both parties depending on the level of comments. If the comments are straight forward, a face-to-face meeting will be a waste of time, only adding to the applicant's plan check costs and detracting staff from other projects.</p> <p>General Comment about the Plan Check</p>	<p>Change made.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>Process:            When plans are submitted to DOT, they should be routed to all applicable aspects of DOT for a comprehensive review, rather than in multiple plan checks. Based on experience, improvement plans are routed to seasonal plan checkers for initial review who returns the plans to the applicant with minor comments; 2<sup>nd</sup> submittal is routed to full time plan checker who returns plans with substantially more comments; 3<sup>rd</sup> submittal is routed to the traffic signal department who returns plans with their own comment; etc. These three levels of review can be completed with the 1<sup>st</sup> submittal.</p>	<p>Comment noted and forwarded to appropriate part in DOT to investigate and address.</p>
4-11  4-12	4.2.3.5 <u>Final Submittal</u>	<p>Heading: Add the underlined text for clarification. This section clearly describes the <b>final</b> submittal and follows the section discussing initial submittals.</p> <p>Paragraphs C and D regarding narratives for conditions of approval and execution of improvement agreements is not a “one size fits all” process. Small projects may process improvement plans at the same time as the final map. In this case, paragraphs C and D are appropriate at this stage of the discussion. However for large multi-phased projects, signing of the improvement plans occurs far before the final map process begins and discussion of Paragraphs C and D is premature. This section should clarify between the two possible timelines.</p> <p>D. Improvement Agreements: “Execute and notarize any improvement agreements, bonds, and permits...” County Counsel has extremely specific requirements for the signing order of</p>	<p>Change made.</p> <p>Clarifications have been made to these sections. In general, this description is intended to provide an overview of the process and is not a cookbook that includes distinctions between all types of projects.</p> <p>Again, the descriptions are not intended to be a cookbook but a general description and overview of the various components in the process.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>agreements and bonds, as well as currency requirements for corporate documentation that should be spelled out here. If done incorrectly unbeknownst to the applicant, the applicant must start the process all over again and unknowingly increases their processing time.</p> <p>E. Security: Maps require some sort of security, not necessarily “projects”. Bonding should not be the only acceptable form of security for RIA’s and SIA’s; cash and Letters of Credit are alternative forms.</p> <p>E.1. Bonds: County Counsel requires a specific signing order between the Surety and Principal that should be spelled out here. Include an additional discussion about how the amounts of each bond type are calculated (e.g. Performance bonds are 100% of the cost of remaining improvements; L&amp;M bonds are 50% of the cost of the remaining improvements; Restoration bonds are specific percentages of grading, drainage and erosion control et al).</p>	<p>Updated.</p> <p>Again, this is not intended to be a cookbook.</p>
4-15	4.2.4.1 Pre-Job Meeting	<p>A.1. “Staging Plan...one lane may be closed first while a new adjacent <del>line</del> <u>lane</u> is under construction.” (Fix typo.)</p> <p>A.4. Material Submittals for Traffic Signals: Delete sentence, “Traffic signals cannot be staked until the County approves the material submittals.” The location of the signal is not relevant to the material submittals; the location needs to be staked in the field for construction purposes.</p>	<p>Fixed typo.</p> <p>Emphasis changed to a note.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
4-15	4.2.4.2 Inspection	Recommend adding: " <u>Applicants have the option to retain outside inspection services upon request. Outside inspectors shall be licensed, insured, and bonded and at the expense of the applicant.</u> " (For reasons previously explained.)	This is an administrative issue that should be addressed with the appropriate Department; this does not belong in the design manual. Generally, the applicants already have the option to have consultants contracted to the County doing plan check or inspection.
4-18	4.2.5.1 Punch Lists for the Project	"A punch list will not be created until everything has already been done on the approved plans." If everything is done, why is a punch list needed?	Clarified that a punch list can include administrative items.
4-20	4.2.6 Fees	D. "...Plan check and inspection fees are typically charged on a time and materials basis <u>unless the applicant opts to hire outside services as described in Section 4.2.3.1.E.</u> " (For reasons previously explained.)	See response to 4.2.4.2 above.

Page

Heading / Topic

Comment

Response

<b>4.3 STANDARDS FOR DISCRETIONARY DEVELOPMENT</b>			
4-22	4.3.1.3 Gates	<p>“Gates are not permitted across any roads (non County-maintained or County maintained).” A blanket statement prohibiting gates across <b>County maintained</b> roads is logical because the County is responsible to maintain the roads and the general public contributes the needed funds. This same blanket prohibition for <b>non-County maintained</b> roads is not appropriate. If an applicant elects to privatize roads within a subdivision and bears the burden to finance the maintenance, gates should be allowed without having to apply for a design waiver as suggested in the response to comments. It is a financial upswing to the County for applicants to finance their own road maintenance and instead of discouraging it with a blanket prohibition, the County should be encouraging it (provided of course the gates are constructed to the satisfaction of the approving fire district for emergency service personnel). Please reconsider this standard.</p>	<p>County staff has been working with the Fire Protection Officers (FPOs) from the El Dorado County Fire Protection Districts since September, 2007 on the Land Development Manual and the FPOs have voiced strong opposition to gates across roadways, County-maintained or non County-maintained.</p>
4-22	4.3.1.4 Improvement Requirements	<p>A. “...A Record of Survey shall <u>may</u> also be filed <u>as required by the Professional Land Surveyors Act...</u>” The underlined text is added for clarity; the PLS Act specifies under what circumstances a map is required or otherwise accomplished under alternative methods.</p> <p>B. NAD83 and vertical datum in the hinterlands can be a very expensive proposition. This should be limited to “where feasible or reasonable.”</p>	<p>Text has been modified but refers to the Business and Professions Code instead of the Professional Land Surveyors Act.</p> <p>If setting NAD83 and vertical datum in the hinterlands will require a very expensive proposition, per the text, the requirement can be reviewed by DOT. If we add the text “where reasonable or feasible”, it is still up to DOT to determine this.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
4-23	4.3.1.7 On Street Parking	<p>B. The sign dimensions have a metric reference that is not used elsewhere.</p> <p>C. At the option of the applicant, painted curbs may be used as an alternative to signage since they are included in the vehicle code.</p>	<p>Change made.</p> <p>The text is directly out of the 2007 California Fire Code; painted curbs are not listed as an alternative in the Fire Code.</p>
	4.3.1.8 Other requirements	<p>“The County Engineer may require additional design and construction requirements as determined to be necessary to prevent excessive operating costs, protection against deterioration, and obsolescence.” This statement is extremely vague and open-ended; please clarify.</p>	<p>Comment noted; however, DOT needs a way to address unusual situations.</p>
4-24	4.3.1.9 Staged Developments	<p>A. “...Temporary turnarounds shall be created in compliance with the standards for permanent turnarounds...” The cost to install temporary turnarounds is a throw-away cost and should be minimized as much as possible. Until the future permanent improvements are installed, temporary turnarounds should suffice as long as they are approved by the local fire department and do not deter from public health and safety.</p>	<p>Agreed. Temporary turnarounds are reviewed by the County and the Fire Protection Officers, as are all plans.</p>
4-26	4.3.3 Street Lighting	<p>A. “Street lighting may be required...” Define the circumstances when lighting is required.</p>	<p>Comment noted; however, trying to define all the possible circumstances where street lighting may be required would be overly restrictive.</p>
4-27	4.3.6. Onsite Improvement Requirements	<p>A. “Parking areas shall be sloped at least two percent in at least one direction to prevent ponding or icing.” An exception should be added for areas bound by ADA guidelines. These areas should be allowed to slope at a minimum of one percent.</p>	<p>Change made.</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
4-28	4.3.7 Underground Power, Communication, and Other Utility Services	<p>4.3.7.1 Standards of Construction</p> <p>G. “No non-yielding obstructions...” Please clarify why this is required and where this requirement came from.</p> <p>H. “...the service line shall then be extended 5 feet beyond the slope catch-point with PVC schedule 40 sized to match the service. Place steel T-posts, painted blue, at the end of this service line.” Why is the County dictating this standard? This should be specified by the water purveyor as appropriate to the project.</p>	<p>This is based on AASHTO’s “Roadside Design Guide”.</p> <p>Clarification added. The County wants the service lines put in place in a way that the purveyor/builder does not have to excavate in roadway cuts or fills in the future. The steel post is to mark the end of that line to ease connection for the builder. Any other acceptable permanent method of marking lines will be considered.</p>
4-30	4.3.9 Design Waivers and Design Exceptions Policy	Please distinguish “Design Exceptions Policy” from the Design Waiver Process.	Clarification has been added.

Page

Heading / Topic

Comment

Response

<b>4.4 MINISTERIAL PERMITS</b>			
4-31	4.4.1 Grading Permits	B. In order for a permit to be issued, a proposed grading project shall be consistent with....1. the County General Plan...” This standard places limitations to grade only on “projects” that have received approval from decision makers.	The text had a formatting problem which has been fixed. All grading permits must be consistent with the 5 items listed in the manual. There’s no statement in the manual that says you can only receive grading permits for projects with approval from decision makers.
4-33		Very end of the Section: “...All County services required for the review, approval and inspection of grading plans and operations shall be paid for by cost recovery fees collected from the applicant, <u>unless the applicant opts to hire outside services as described in Section 4.2.3.1.E.</u> ” (For reasons previously explained.)	See response to 4.2.4.2 above.
4-37	4.4.3 Timber Harvest Temporary Encroachment Permits	E. “The following inspections, respectively, are required for this permit, <u>unless the applicant opts to hire outside services as described in Section 4.2.3.1.E.</u> ” (For reasons previously explained.)	This section has been narrowed.
4-41	4.4.5 Oversized Load Permits	The focus of this Land Development Manual centers on expectations of applicants and their engineers. It seems oversized load permits are intended for general engineering contractors, equipment operators, etc. Please confirm or clarify. The concern is that new county staff may interpret this section to be an obligation of an applicant prior to discretionary or ministerial permit approval.	This section has been narrowed. Oversized Load Permits do not apply to the processing of discretionary projects. They may be required, for example, to transport a mobile home, prior to delivery of a mobile home, which may require a building permit.

Page

Heading / Topic

Comment

Response

<b>4.5 OTHER</b>			
4-48	4.5.1.3 General Vacation	<p>A.1. "DSD's Planning Services Staff review the application for consistency with the County's General Plan, <u>including a thorough investigation of the circumstances or previous discretionary approval that required the dedication. General vacations may negatively affect adjoining properties and this information should be presented to the Board for their consideration.</u>" Based on experience, an applicant was conditioned to dedicate an access road for a particular project. Sometime later, the Board approved a general vacation application from the neighboring properties that eliminated the access and the original applicant has been negatively impacted.</p> <p>A.3 and A.4 (Public Hearings): It is recommended that public hearings be noticed similar to Planning Services' procedure for certain discretionary projects (e.g. mailed notice to adjoining property owners with a 300 or 500 foot radius) so neighboring owners receive proper notice and have the ability to comment on the vacation.</p>	This section has been narrowed.

Page

Heading / Topic

Comment

Response

<b>CHAPTER 5: GRADING, EROSION AND SEDIMENT CONTROL</b>			
	General Observation	The adopted threshold for grading permits at 50 cubic yards is too restrictive and unduly creates excess work for Staff.	Comment noted. The 50 cubic yard threshold is contained in the Grading Ordinance, which is not being updated at this time.
5-2	5.1 General Policies	B. "Natural features....shall be <b>preserved</b> consistent with the policies of the El Dorado County General Plan...." Emphasis is added to "preserved" because this isn't necessarily what the General Plan says.	References to General Plan Policies, Objectives and Implementation Measures have been added to clarify.
5-8	5.2.3 Setbacks	B. Grading Setbacks / Cut and Fill Slopes: An exception should be added for applicants who own an adjacent parcel, obtains a slope easement, or obtains an encroachment permit.  Figure 1: Setback Dimensions for Graded Slopes: This figure needs to be revisited. The proposed setback from top or toe of slope creates a "no man's land" and doesn't work for mass-pad graded lots. The term "permit area boundary" is vague; provide a definition.	Text has been modified to allow for exceptions in some instances.
5-19	5.2.5 Retaining Wall Design	C.7.a. Inspections: All inspections should be performed by the designing engineer.	This is an administrative issue that should be addressed with the appropriate Department. This does not belong in the design manual. Generally, the applicants already have the option to have consultants contracted to the County doing plan check or inspection.
5-24	5.3 Grading Permit Application and Procedures	Does the table address pad grading for commercial and industrial projects prior to the building permit stage?	Yes. This is addressed under "Non-Residential Development Grading"

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
5-36	Inspections and Construction Requirements	A. Inspections: As previously discussed, the project applicant should have the option of hiring outside inspectors that are licensed and insured.	This is an administrative issue that should be addressed with the appropriate Department. This does not belong in the design manual. Generally, the applicants already have the option to have consultants contracted to the County doing plan check or inspection.

Page

Heading / Topic

Comment

Response

<b>CHAPTER 6: SURVEYING AND MAPPING</b>			
6-3	6.2.1 Final Map	After Paragraph D: "...such a submission shall be in compliance with the approved phasing plan." This is inconsistent with Subdivision Map Act Section 66456.1 (Multiple final maps on one tentative map). In providing a phasing notice, a subdivider is not required to define the number or configuration of the proposed multiple final maps.	The text has been changed to clarify.

<b>STANDARD PLANS</b>			
<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
	General Comments	<p>The draft standard plans refer readers to other standard plans that have not been developed yet (e.g. sidewalk, curb, and landscape median details), making it difficult to provide complete comments.</p> <p>The street widths are unnecessarily wide, especially for local roads. The wider the streets, the more drivers are encouraged to speed, and subsequently pedestrian safety is jeopardized.</p> <p>Requiring sidewalks on both sides of the street is excessive and unnecessarily increases project costs. Please cite the government code section, General Plan policy or research that dictates such a standard.</p> <p>Regarding “fabric reinforcement”: Caltrans is classifying those products as “Subgrade Enhancement Geotextiles”; if you consider it important to be in concert with their documents, please consider.</p> <p>Request edge and median drains be included in all new roadway sections</p>	<p>The road width issues are critical to Staff and developers and that’s why these need to be advanced ahead of the rest. The sidewalk, etc. standards can come later because not all projects are dependent on those. When other standards are proposed, the road cross sections will be revisited.</p> <p>Widths are designed to provide adequate circulation and access. We recognize that wider streets mean increased speeds but there are other design features that can be put in place to facilitate pedestrian safety.</p> <p>Pedestrian safety should not be compromised unnecessarily simply because it increases project cost. Reference: General Plan Goal TC-5 which states “to provide safe, continuous, and accessible sidewalks and pedestrian facilities as a viable transportation mode.”</p> <p>Change made.</p> <p>Staff will update the “Landscaped Median Standard Plan” to require that median subdrains will be required for all landscaped medians. A note will be added to Road</p>

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		Include Traffic Indices (T.I.s) for various road widths in the Road Cross-section standard plans.	Standard Plans that edge drains will be required on the uphill side of roadways in a cut, where landscaping is proposed.  Table 613.3 in the County's "Highway Design Manual" (HDM) addresses this request.
	General Note 3: "Basic Criteria"	The 10' and 12' travel lane criteria seems inconsistent with dimension B on the typical sections. Using EDH as an example, Dimension B is 32 feet for a local road under 500 ADT. Two 10 foot travel lanes and 2.5 feet of curb and gutter on both sides equals 25 feet. Why is Dimension B 7 feet wider?	Dimension B is 7 feet wider to provide space for parked cars while maintaining a minimum of two lanes of access.
	General Note 12: Maximum Grade	Local roads with a design speed of 25 mph as proposed are capped at 10% grade. The current DISM allows a maximum of 15% with County Engineer approval. Given the terrain in El Dorado County, 10% is unrealistic and too restrictive.	In note 12, deleted "maximum grade shall be 10%".
RS-20, 21	Local Roads El Dorado Hills and Cameron Park et al	El Dorado Hills has a wider street width for ADT under 1200 (36' and 32') versus Cameron Park et al (32' and 28'). Please explain the difference for the separate standards.	The intent of having different standard plans for different areas of the County was to recommend different types of development that appear in those different areas e.g., El Dorado Hills tends to be higher densities than Cameron Park; concrete curb, gutter, and sidewalk are inappropriate for Pollock Pines.
RS-91	Gated Street Standards	Dimension D requires a 1 foot stacking distance from the public street to the gate for every dwelling unit served. The response to comments indicates the County would consider a smaller queuing analysis as determined by a traffic engineer, however the Standard Plan does not reference this and it should be updated.  The response to comments also indicates that a 2,000 unit Planned Development is not reasonable and a development of this size would require a	Comment noted. DOT is pulling this standard out of this package for further review and will issue a revised one in the future.

<u>Page</u>	<u>Heading / Topic</u>	<u>Comment</u>	<u>Response</u>
		<p>number of access roads and entrances. The language used for Dimension D does not offer any flexibility that the response to comments seems to indicate.</p> <p>Using a real life example, the North Uplands Neighborhoods of Serrano Villages H, I, J, K, L and M total 1,537 dwelling units and is served by three gated entries (one off Appian Way and two off Serrano Parkway). Using the proposed standard for Dimension D, what would the required queuing distance be for each of the three entries?</p>	