Sign Ordinance Update Draft Environmental Impact Report (DEIR)

Agency, Organization and Group Written Comments received during 45-day DEIR public review period 12/31/14 through 2/17/15. Comment Period closed at 5:00 p.m. on February 17, 2015.

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<td>Dyana Anderly</td>
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<td>Comment Form with attachment submitted at 1/29/15 public mtg</td>
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<tr>
<td>2-17-15</td>
<td>Mary Cahill</td>
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<td>Letter hand-delivered w/attachments</td>
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<td>4-17-15</td>
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5/20/15
January 29, 2015

Sign Ordinance Update Draft EIR Meeting Comment Form

Please provide your comments on the Sign Ordinance Update Draft EIR. Comments should focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which potential significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest specific alternatives or mitigation measures that would provide better ways to avoid or mitigate potential significant environmental effects. You can provide this form with your written comments to staff at this meeting or mail or email your comments, prior to 5:00 p.m. on Tuesday, February 17, 2015, to:

Anne Novotny, Senior Planner
El Dorado County Community Development Agency, Long Range Planning
2850 Fairlane Court, Placerville, CA 95667
Email: anne.novotny@edc.gov Fax: (530) 642-0508

Name: [Name]

Address: [Address]

Comments: [Attached]
Comments

It appears that Cameron Park will be the community most impacted by the signs that would be allowed in the proposed El Dorado County Sign Ordinance. The Executive Summary of the draft EIR states,

_The County recognizes that signs are an essential element of a community’s visual appearance and provide a means to identify and promote local establishments. Signs provide useful information to the public, but should not become visual distractions along public roadways._

More should be said other than that signs “should not become visual distractions along public roadways.” There should also be a statement that signs should not be the source of visual blight, they should not be unsightly, they should not contribute to sign clutter, they should not detract from the natural element or the built environment, and they should be consistent with the officially adopted design guidelines for each El Dorado County community.

The Executive Summary indicates that the “no digital signs” alternative is the environmentally superior option; however, there was no alternative that considered eliminating or reducing the size of the proposed 60-foot-high multi-tenant Highway 50-oriented signs, which are likely to be the most visually offensive signs of all proposed signs. Also of significant visual impact would be the single tenant signs, which can be 24 feet high, and the clutter that could be associated (by right) with single-tenant signs outside the Highway 50 corridor which have no separation requirements and can be 12-feet high.

The main environmental issue associated with sign is the visual aspect of them, i.e., their potential aesthetic impact on the environment. The Cameron Park Design Review Committee requested that the EIR display pictures of what the environment might look like should signs be permitted as proposed. For example, what would the visual impact be of 60-foot-high signs marching up Highway 50 in Cameron Park? That is as tall as a 6-story building. Also, try to envision a shopping center where each single tenant could have a 12-foot high sign. How can decision-makers possibly make an intelligent judgment about visual impacts unless there is a visual representation of what the environment might look like with signs as proposed? In our opinion there is the potential for the proposed sign ordinance to substantially degrade the existing visual character or quality of the site and its surroundings of the signs that are allowed. The Executive Summary states,

_This document is a programmatic EIR that is intended to provide a broad analysis of the proposed countywide sign standards which apply to many different sign types and locations. Therefore, descriptions and/or analysis of individual signs would not be appropriate and would be beyond the scope of this document._

Comments by Cameron Park Design Review Committee
The Design Review Committee recognizes that, as a programmatic document, the EIR does not address individual signs. However, from a cumulative standpoint, 60-foot high signs may be a significant impact on the environment, particularly in Cameron Park and Shingle Springs. Signs can contribute in a more positive way to community identity than what is proposed. The Committee is unaware of any visual analysis that was conducted that would have concluded that 60-high signs are necessary to adequate identification and that they would be an attractive addition to our communities. Even most urban cities do not allow signs that are that tall.

The proposed Sign Ordinance prohibits the reviewing body from denying Highway 50-oriented signs that meet height and area criteria. No use permit would be required, and there could be no judgment made as to how this sign fits in with its surroundings, conflicts with it, or diverts attention from the roadway. The proposed ordinance states, "U.S. Highway 50-Oriented Signs. A Design Review Permit shall be required for all U.S. Highway 50-Oriented signs located within 100 feet of the designated state highway. The approval of a Design Review Permit is a ministerial project pursuant to CEQA when in compliance with adopted standards set forth in Section 17.16.070." This provision erroneously depends on the determination of the EIR document that there would be no significant impact on the environment.

Pictures are necessary to determine visual impacts on the environment. There is already sign clutter in Cameron Park and Shingle Springs, and a visual representation of what could occur with adoption of the proposed sign ordinance that allows 60-foot-high signs will likely show that additional very tall signs will exacerbate this situation. The same holds true for the single-tenant signs that could be quite numerous and add significantly to sign clutter. The signs depicted below are less than 60 feet high, and they are unnecessarily high for adequate identification. The proposed Sign Ordinance indicates that Highway-50 oriented signs are to be a ministerial action, meaning that if they meet the height, area and setback requirements they cannot be denied. In effect, without a visual analysis of the impacts of these large signs, there is to be no further environmental review.
The State of California provides for small blue signs near freeway off-ramps which provide motorists with information regarding food, fuel and lodging. The use of these signs as a project alternative in the EIR would be appropriate.

The Executive Summary lists project objectives, including:

- **Promote economically stable and visually attractive communities within the county.**
- **Promote signs and graphics that are attractive, pleasing, and harmonized with the physical character of the structure and environment of surrounding properties.**
- **Protect viewsheds in designated scenic corridors.**
- **Encourage individuality among communities and businesses through signage.**

The Executive Summary also points out that the General Plan is proposed to be adopted that will allow billboards to be relocated to outside designated Scenic Corridors. Furthermore,
signs along Highway 50 in the scenic corridor are proposed to be shorter than those outside the scenic corridor. A visual representation of what the difference is would help decision makers decide if this proposal is to be adopted.

A study is to be done to indicate if the scenic corridor can be extended to the west of Placerville. However, with the recent addition of offensive billboards in these areas that impede the views of the sierras and other natural features, it is dubious that Highway 50 in the vicinity of Cameron Park and Shingle Springs will be designated as a scenic corridor. But, what does that have to do with making sure that signs along all segments of Highway 50 are attractive? The notion that signs should be more sensitive to their surroundings and not impede the views of the natural environment ONLY IN THE DESIGNATED SCENIC CORRIDORS is offensive to those of us in Cameron Park who want an attractive community. A sign ordinance should require attractive signs that contribute in visually positive ways to all communities in El Dorado County and that do not impede attractive settings. The notion that attractive signs should be provided for along a scenic corridor and less attractive signs may be allowed elsewhere does not take advantage of this opportunity to improve the aesthetic quality of the entire county. The aesthetic impacts of this provision of the Sign Ordinance should not be considered “no impact” or “less than significant impact.”

Cameron Park and Shingle Springs are already riddled with sign clutter, and to allow relocation of billboards to our area solely because it may be outside a designated scenic corridor would further denigrate our skyline and contribute to visual blight. There should at least be a provision for amortization and possible buy-out of billboards.

The proposed Sign Ordinance would allow 20-foot high pole signs on local streets. There should be a visual representation of the result of adopting such a provision. This representation would show that there could be an adverse visual impact, both aesthetically and as a distraction to motorists who would have to take their eyes off the road to view such signs. In addition, the 20-height would likely interfere with tree canopies, which often results in severely pruning trees to make the sign more visible or even removing trees. A visual representation would reveal that a 6 – 10-foot sign would be more in the line of sight of motorists.

Note on the following page the line of sight of motorists trying to view tall signs and that they would have to take their eyes from the road to read the tallest sign. A picture is worthwhile for determining impacts on the environment.
Additional comments from the Cameron Park Design Review Committee may be forthcoming.
Comments on Draft EIR for proposed EDC Sign Ordinance

1 message

danderly@comcast.net <danderly@comcast.net> Tue, Feb 17, 2015 at 4:23 PM
To: "Driever, Eric" <driever.eric@yahoo.com>, "Harris, Mark" <mark54@comcast.net>, "Layton, Jane" <janelayton@directcon.net>, anne.novotny@edcgov.us, shawna.purvines@edcgov.us

PLEASE SEE ATTACHED

From: danderly@comcast.net
To: "Dyana Anderly" <danderly@comcast.net>, "Eric Driever" <driever.eric@yahoo.com>, "Mark Harris" <mark54@comcast.net>, "Jane Layton" <janelayton@directcon.net>
Sent: Tuesday, January 27, 2015 1:51:03 AM
Subject: County Sign Ordinance Update - NOA for Draft EIR released 12/31/2014

Hi All,

I've highlighted in yellow (below) the url that will take you to the most recent version of the County Sign Ordinance and the EIR.

------------------
From: "Anne Novotny" <anne.novotny@edcgov.us>
To: "driever.eric" <driever.eric@yahoo.com>, "Dyana Anderly" <danderly@comcast.net>
Cc: "Shawna Purvines" <>
Sent: Wednesday, December 31, 2014 2:07:16 PM
Subject: Re: County Sign Ordinance Update - NOA for Draft EIR released 12/31/2014

Eric & Dyana,

On December 31, 2014, a Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) for the Sign Ordinance Update was released for a 45-day public review and comment period. The deadline to submit written comments is **5:00 p.m. on Tuesday, February, 17, 2015**. The NOA, Draft EIR and proposed Sign Ordinance Update are posted on the Long Range Planning website:


If you would like a hard copy of the DEIR, please let me know and who/address to mail it to.

Please forward this email to the other members of the Cameron Park Design Review Committee and anyone else who may be interested.

If you have any questions, please contact me.

Anne Novotny
On Fri, Oct 3, 2014 at 10:32 AM, Anne Novotny <anne.novotny@edcgov.us> wrote:

On October 1, 2014, a Notice of Preparation (NOP) was released for the Sign Ordinance Update draft Environmental Impact Report (EIR). A public scoping meeting is scheduled for Thursday, October 23rd at 6:00 PM in the Planning Commission Hearing Room.

The NOP is posted on the Long Range Planning Website, along with the Public Review Draft of the proposed Sign Ordinance Update:


Please forward this email to the other members of the Cameron Park Design Review Committee and anyone else who may be interested.

Thank you for your valuable input on this comprehensive update to the Sign Ordinance. If you have any questions, please contact me.

Regards,

Anne Novotny
Senior Planner

County of El Dorado
Community Development Agency
Long Range Planning Division
2850 Fairlane Court
Placerville, CA 95667
(530) 621-5931 / (530) 642-0508
anne.novotny@edcgov.us

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sign ordinance comments - 2-17-15.docx
3510K
The Draft Environmental Impact Report (DEIR) finds the following:

**ES.7 SUMMARY OF ENVIRONMENTAL IMPACTS**

**Impact 3.1.3** The proposed project would not substantially degrade the existing visual appearance or quality of a site and its surroundings. Less than significant. None required. Less than significant

**Comment:** I disagree with the finding of the preparer of the DEIR that the proposed sign ordinance would not substantially degrade the existing visual appearance or quality of a site and its surroundings.

Fact: As the proposed sign ordinance is currently written, there would be no further environmental review of 60’ high signs that are outside an officially adopted Scenic View Corridor in that they would be established as a ministerial project having only to meet design standards of height, area and setbacks and that the CEQA issue was already handled under the EIR. The DEIR states the opposite is true, that the signs To the extent adoption and implementation of the Sign Ordinance would result in future sign installations and modifications, which could be either ministerial or discretionary actions by the County, each specific project would be evaluated by County staff to determine the appropriate level of review under CEQA.

There are scenic vistas outside the adopted Scenic View Corridor that could be impacted by the proposed sign ordinance. Furthermore, the DEIR refers to a planned work product that involves looking at establishing additional Scenic View Corridors. This should not be a factor in any determination in the DEIR that the existing visual appearance or quality of a site and its surroundings will not be impacted in that (1) this work project has been proposed for decades with no action taken, (2) the areas being considered may not qualify as a Scenic View Corridors per State standards even though they do have scenic vistas, and (3) even if considered, how the Board of Supervisors may vote on the matter is pure speculation. These facts are evident in the current General Plan showing that the voting public required consideration of expanding the Scenic View Corridor over 10 years ago, the lapse of time between when the proposed sign ordinance was required to be completed, and the numerous consultants hired to prepare various studies and whose work has ended up “on the shelf.”

**Excerpt from DEIR:**

1 **PROJECT OVERVIEW**

The proposed project consists of the adoption and implementation of an update to the County’s existing Sign Ordinance (Chapter 17.16 of the Zoning Ordinance). The Sign Ordinance update is intended to ensure that signs are consistent with the visual and aesthetic goals and policies set by the El Dorado County General Plan and protect the county’s visual character and scenic landscapes. The Planning Commission and the Board of Supervisors will also consider amendments to 2004 General Plan Objective 2.7.1 and corresponding Policy 2.7.1.2 pertaining to billboards along designated scenic corridors. (See Section 2.3.3 for proposed amendment...
The proposed project does not involve amendments to the County General Plan land use designations or zoning districts or any new entitlements. Consideration of General Plan Objective has no place here in that its outcome is purely speculative - and even may not be considered.

Fact: Because the proposed sign ordinance would allow 60’ high signs along Highway 50, even if in small numbers with 1000 feet between them, and because the proposed sign ordinance would allow 20’ high signs along local, two-lane streets, and because the proposed sign ordinance would allow an unlimited number of 12’ high monument signs (one for each business) within a shopping center, I believe that the number and height of these signs could substantially degrade the existing visual appearance or quality of a site and its surroundings. These facts are evident in viewing the existing signs that are overly large and unsightly both along Highway 50 and along local streets.

Fact: There has been no research put by either a consultant or the County staff to show that 60’ high signs are necessary for providing adequate identification of businesses along Highway 50, so they may be inconsistent with the stated purpose of providing adequate identification while being consistent with visual and aesthetic goals. The Land Use Goal is to balance adequate identification and improving the character of the area in which they are located. Visual examples of a 60’ high sign next to a one-story building would show how inconsistent in scale the sign would be with its surroundings.

Excerpt from DEIR: Table ES-1 lists project and cumulative impacts. “The proposed project could result in significant effects related to the allowance for new digital signs in the County; there are no other significant and unavoidable impacts of implementing the proposed project. The proposed project’s contribution to light and glare under cumulative conditions would be cumulatively considerable; the project would not result in any other cumulatively considerable impacts.

Fact: The preparer of the DEIR is required by CEQA to provide a reasonable range of alternatives. However, the only alternative to excessive light is to not allow digital signs at all. There was no mention of allowing them only in the daytime, or reducing the number of digital signs to a finite number, size and distance so as to reduce the light and glare to acceptable levels. There was no analysis presented or cited to show to what extent light a glare would be increased because no reasonable assumption was made that there would be excessive light and glare, e.g., how many digital signs and of what size would have to occur before there would be a significant adverse impact on light and glare. One would have to conclude that every municipality that allows digital signs should be prepared an EIR and made findings of overriding considerations to permit then, which is highly unlikely.

And finally, to infer that there are no significant aesthetic impacts because the proposed sign ordinance is generally better than the existing ordinance is absurd. It may be superior to the existing, but one cannot conclude from that comment that it is acceptable and meets the intent of the General Plan.
2.

The intent of the standards is to ensure that signage is consistent with its physical surroundings and does not detract from the surrounding visual character or cause safety hazards. **Does not “detract.” How about complements, and what is there to ensure that the sign is consistent with its physical surroundings when there is no design review?**

Fact: The proposed sign ordinance is inconsistent with the following General Plan Policies:

**GOAL 2.2: LAND USE DESIGNATIONS**
A set of land use designations which provide for the maintenance of the rural and open character of the County and maintenance of a high standard of environmental quality

**GOAL 2.4: EXISTING COMMUNITY IDENTITY**
Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents.

**Excerpt from DEIR:**

2.3.3 PROPOSED GENERAL PLAN AMENDMENT
The proposed project is intended to bring the Sign Ordinance into compliance with the General Plan. Therefore, the proposed project would not conflict with the County’s adopted General Plan. The Sign Ordinance update is a policy document and would not directly construct new signs or modify existing signs and would not directly result in any changes in land use or development project entitlements or approvals that could conflict with other applicable resource plans or program (e.g., regional air quality plan). There would be no impact, and this issue is not evaluated further. **How about indirectly cause impacts.**

Fact: The Code of Federal Regulations of the United States of America sets standards for signs as does Cal Trans. It is noted that signs intended to get the attention of motorists are generally not high because they are viewed from windshields and do not cause a driver to take his/her eyes from the path of travel, perhaps no higher than 8 feet. When a sign is 20’ high and is closed to the roadway of a two-lane road, a driver’s attention may be averted, as indicated in the pictures below. They are not as effective as they would be if 6 feet high.

The sign below at about 6 feet high is more effective than one would be at 20 feet high:
The picture below shows how unsightly tall signs can make a community appear. Any additional signs would only exacerbate the situation.

The picture below shows how a 20' high sign is less effective at identifying a business than a lower sign and shows that the driver would have to take his/her eyes from the road to read the sign. In addition, this sign is not even visible from eastbound Highway 50 traffic, and is therefore must less effective and costly and less attractive than a lower monument sign would be.
ENVIRONMENTAL ISSUES EVALUATED IN DETAIL IN THIS DRAFT EIR

This Draft EIR evaluates the environmental effects on aesthetics and visual resources. The analysis is provided in Section 3.1, Aesthetics, in this Draft EIR. Based on a review of potential impacts and comments received in response to the Notice of Preparation (NOP) and during public outreach efforts, the County of El Dorado determined that there was no substantial evidence that the proposed project would cause or otherwise result in significant environmental effects in the resource areas identified in “Environmental Issues Not Evaluated Further in This Draft EIR,” below.1

Fact: Although the staff may find no substantial evidence of a significant environmental impact other than light and glare from digital signs, “the County of El Dorado” DID NOT make this determination because they have not considered the final DEIR yet.

A sign has a strong impact on the environment. Signs transmit messages beyond the boundaries of the sites on which they are located and, thus, affect both residents and other passersby. Signs are an integral part of its environment and, as such, can detract from or enhance the image and character of the community. The purpose of a good sign ordinance is to:

Insure that high standards of design and readability and the construction of aesthetically pleasing signs are maintained for all signs.

Protect and preserve the visual beauty and ambience of a community through control of the number, size and types of signs.

Promote aesthetic signing and graphic design that enhances the rural or historic quality of a building and its environment, and thus protect the distinct a nature of the community; and

To promote signs that are visually effective.

Submitted by,
Dyana Anderly, AICP
Masters: USC, School of Urban Planning and Development
February 17, 2015

Anne Novotny, Senior Planner
El Dorado County Community Development Agency
Long Range Planning,
2850 Fairlane Court, Building C
Placerville, CA 95667

Dear Anne Novotny,

Comments related to the draft sign ordinance:

1) Attached to this letter is a copy of our comments that were submitted on October 14, 2014. We still feel that there needs to be more definitive specific location language included in Section 17.16.030; especially as it relates to election signs (B-10b).

2) We support the language contained in Section 17.16.060. As indicated in our previous comments, there are six public relations signs (two at Hacienda Park, three at Christa McAuliffe Park (two dual facing and one single facing) and one at David West Park) that the Cameron Park Community Services District has grandfathered in to the Sign Ordinance. The design and detailed descriptions were submitted to the County Building Department in November, 2013. These signs have been in use by the CPCSD for many years advertising civic and community events.

3) Under Section 17.16.070, E-4b; setback and spacing of freestanding signs. The spacing of CPCSD existing signs at Christa McAuliffe Park are restricted to 450 feet due to property size. The remainder of the park is in a bowl shape which is also in a large PG&E easement which makes it impossible for signage and we are requesting an exemption for these existing signs.

We are also forwarding copies of comments submitted by the Cameron Park Design Review Committee. We have reviewed these comments and feel that they should be given strong consideration for adjustments to the existing sign ordinance.

We will be submitting additional comments, if needed, prior to the Board of Supervisors adoption of the updated Sign Ordinance. Once again, thank you for giving us this opportunity and feel free to contact me if you have any questions.

Sincerely,

Mary Cahill
General Manager

Attachments: As Stated Above
October 31, 2014

Ms. Anne Novotny, Senior Planner
County of El Dorado
Community Development Agency
Long Range Planning Division
2850 Fairlane Court
Placerville, CA 95667

Dear Ms. Novotny:

Below are our comments on the draft Sign Ordinance Update.

1) 17.16.030 – B; More definition is needed regarding political signs, such as; location, freeway, empty lots, government buildings, Department of Transportation (DOT) right-of-way, etc.

2) 17.16.060; There are six public relation signs (two at Hacienda Park, three at Christa McAuliffe Park and one at David West Park) that the Cameron Park Community Services District (CPCSD) has grandfathered in to this Sign Ordinance. The design and detailed descriptions were given to County Building Department in November 2013. These signs have been in use by the CPCSD for many years advertising civic and community events.
   - Regarding signage on landscape corridors, is there any intended regulation regarding commercial, political, or real estate signs in landscape corridors?
   - Thank you for recognizing that some communities require more than one identity sign for multiple points of entry.

3) 17.16.070 – E – 4. b.; The CPCSD existing signs at Christa McAuliffe Park are restricted to 450' due to property size. The remainder of the park is in a bowl which is also in a large PG&E easement which makes it impossible for signage and may require an exemption for existing signs.

Please also consider the enclosed comments from our Design Review Committee.

These are initial comments and I will submit additional comments if needed. Thank you for giving us this opportunity and feel free to contact me if you have any questions.

Sincerely,

Mary Cahill
General Manager

Enclosure
cc: Paul Ryan, Park Superintendent

2502 Country Club Drive
Cameron Park, CA 95682
(530) 677-2231 / (530) 677-2201 (f)
DESIGN REVIEW COMMITTEE
COMMENTS ON COUNTY SIGN ORDINANCE

The environmental document should focus on visual examples of what the County would look like if signs were to be installed in accordance with the proposed County sign ordinance.

There should be a “Purpose” section. The “Content” section should be renamed “Purpose.”

1. The “Content” section would to the extent allowable by law eliminate billboards along “identified scenic and historic routes.” This paragraph refers to “objective 2.7.1, but it does not indicate that this is an objective of the County General Plan.

Cameron Park is not located in an identified scenic and historic route, but the goal of the sign ordinance should be to eliminate the billboards in Cameron Park or actually the entire County. They mostly advertise goods and locations that are not helpful to the local economy (beer, Thunder Valley Casino, etc.) Objective 2.7.1 (OBJECTIVE 2.7.1: SIGNS REGULATION, Regulation of the location, number and size of highway signs and elimination of billboards along identified scenic and historic routes. Policy 2.7.1.1 The Sign Ordinance shall include design review for signs within the foreground and background of the designated scenic corridors commensurate with the goal of scenic corridor viewseshed protection.)

2. Under the “Applicability” Section, subsection E. states “Protect viewsheds in designated scenic corridors.” Because billboards are inherently unattractive and constitute a visual blight and contribute nothing positive to the character of El Dorado County, they should not be allowed anywhere and more specifically in Cameron Park.

3. Under “General Sign Requirements” subsection A, refers to complying with “other private agreements that provide more restrictive sign regulations than are required by this chapter. Reference should be made to complying with community-based, officially adopted sign guidelines.

Under subsection G. there is an indication that exceptions from sign standards require a variance. However, those businesses pursuing signs are typically just starting out and the costs and time associated with the variance process are too restrictive and not practical. Come up with another process, such as “Sign Exceptions” (or other wording) which can be approved by the Planning Director when certain criteria are met.

4. Under “Exemptions,” subsection 6, there should be a maximum area for street addresses and oversized addresses can be used as an advertisement in themselves. Under subsection 10, vehicles with signs on them should also be registered, operable, should not be stationary (not parked in a field and serve as a huge sign.)

5. Under “Exempt Signs With Limitations,” subsection 3 relating to flags, there should be a limitation on the number of flags. There should be an indication that when a flag is used as a sign to identify a business, the flag must count toward the number and area of allowable signage.
Under subsection 8, real estate signs cannot be placed in the public right-of-way, but this is not very practical given the rural character of the area.

Subsection 12, sub-subsection a. refers to temporary signs and indicates that temporary signs should not project above the roof line. They should be prohibited from being on the roof at all.

Under “Permanent Signs, subsection 4, indicates where permanent signs are permitted. Sub-subsection 4 would indicate that permanent signs are allowed only outside designated scenic corridors. The reader would incorrectly conclude that permanent signs are not allowed in the scenic corridor at all if within 100 feet of Highway 50.

Under “Sign Development and Design Standards,” subsection C, “Sign Height Measurement,” the height should be measured from the sidewalk or street grade given the topography of the area. One sign might sit on the high side of the street and another on the down-hill side of the street where visibility is equally important. Signs should not be placed on landscaped mounds to achieve greater height. Signs are viewed by motorists and pedestrians, so measuring the height from the sidewalk or road grade is ideal.

Under “Sign Development and Design Standards,” subsection C, sub-subsection 4.b. relates to minimum spacing distance between permanent freestanding signs. Highway 50 signs are to be separated by 1000 feet. Did County staff determine how that might look in Cameron Park or how that could result in many signs already existing being rendered nonconforming? If nonconforming, which sign should be removed first? The environmental analysis should include visual depictions of what this might look like. This section goes further to say that approving authority may allow a reduction in spacing to ensure that a qualified (whatever that is) business can have at least one freestanding sign. If this is the case, then the separation requirement does not hold any water and most signs in Cameron Park and along Highway 50 would be much less than 1000 feet apart. Would a variance be required?

Under “Sign Development and Design Standards,” subsection F relates to maintenance and indicates that violations could be considered a nuisance and a zoning violation and would be enforced as such. There should be different enforcement procedures for signs. For example, temporary signs in the public right of way that cause a nuisance should not be allowed to wait until a court date or given a couple of weeks to comply. There should be a provision for County staff removing dangerously placed signs.

Under “Sign Development and Design Standards,” subsection H, “Design Standards for Specific Sign Types,” raceway signs should not be allowed as individual letters (push pin signs) are much more attractive. Also, canned signs should not be permitted.

Under “Sign Development and Design Standards,” subsection J, “Standards for U.S. Highway 50-Oriented Signs, design review by the Planning Commission is required. However, these signs should not be taken for granted and a use permit should be required. Further, under subsection J, sub-subsection 4 relates to height. Although maximums are indicated, there should be proof that the maximum height is necessary for adequate visibility and not just be taken for granted. A much lesser height may be
adequate and more readily and safety seen by motorists. The sign should be within a motorist’s line of sight and no higher.

TABLES

The tables make reference to “public” streets, yet many of the County’s streets are private.

Monument signs should not exceed 6 feet high. This height is within the line of site of motorists. County communities are small and speed-limits are relatively low so that large, tall signs are unnecessary and unnecessarily intrusive.

It should be clear that when there are multi-tenant buildings or campus-type developments each tenant should not be allowed a free-standing sign. One sign for most developments, with space on the sign for each tenant is adequate. This is especially true in an industrial area where the general public is generally not looking for a specific location. Once a truck driver finds an industrial business, they need to find it only the first time.

Within the AE-PA zone the maximum height is 6 feet above the roofline. There is no such thing as an attractive roof line and all roof signs should be prohibited in every zoning district.

Under “Permit requirements and Review Procedures,” it should be made clear that sign design and location should be a part of any proposed development, especially commercial development. It should be shown how the sign will relate to the architecture of the building, where on the building a sign may be situated, where within the proposed landscaping a sign would be located, and how a sign will not interfere with proposed landscaping, such as trees and shrubs, and with proposed light standards. Landscaping should be designed to ground a sign by providing an attractive and colorful base around the sign. Attractive signs are not afterthoughts. Signs should not overlap architectural features, including windows or other decorative elements, or hang off an eave.

Under “Prohibited Signs,” subsection b, sub-subsection 3, provides for roof signs in rural areas. All roof signs should be prohibited. (What defines a “rural” area?)

Under “Prohibited Signs,” subsection b, sub-subsection 12, and subsection C. “nonconforming signs,” refer to a “person installing the sign.” This language is likely non-enforceable in that the “person” may no longer be available or his/her whereabouts may not be known, and a sign company rather than an individual may be responsible for the sign. Re-write this section.
CAMERON PARK SIGN ORDINANCE

ENVIRONMENTAL IMPACT REPORT (EIR)

COMMENTS

It appears that Cameron Park will be the community most impacted by the signs that would be allowed in the proposed El Dorado County Sign Ordinance. The Executive Summary of the draft EIR states,

*The County recognizes that signs are an essential element of a community's visual appearance and provide a means to identify and promote local establishments. Signs provide useful information to the public, but should not become visual distractions along public roadways.*

More should be said other than that signs “should not become visual distractions along public roadways.” There should also be a statement that signs should not be the source of visual blight, they should not be unsightly, they should not contribute to sign clutter, they should not detract from the natural element or the built environment, and they should be consistent with the officially adopted design guidelines for each El Dorado County community.

The Executive Summary indicates that the “no digital signs” alternative is the environmentally superior option; however, there was no alternative that considered eliminating or reducing the size of the proposed 80-foot-high Highway 50-oriented signs, which are likely to be the most visually offensive signs of all proposed signs.

The main environmental issue associated with sign is the visual aspect of them, i.e., their potential aesthetic impact on the environment. The Cameron Park Design Review Committee requested that the EIR display pictures of what the environment might look like should signs be permitted as proposed. For example, what would the visual impact be of 80-foot-high signs marching up Highway 50 in Cameron Park? That is as tall as an 8-story building. How can decision-makers possibly make an intelligent judgment about visual impacts unless there is a visual representation of what the environment might look like with signs as proposed? The Executive Summary states,

*This document is a programmatic EIR that is intended to provide a broad analysis of the proposed countywide sign standards which apply to many different sign types and locations. Therefore, descriptions and/or analysis of individual signs would not be appropriate and would be beyond the scope of this document.*

The Design Review Committee recognizes that, as a programmatic document, the EIR does not address individual signs. However, from a cumulative standpoint, 80-foot high signs may be a significant impact on the environment, particularly in Cameron Park and Shingle Springs. Signs can contribute in a more positive way to community identity than what is proposed. The Committee is unaware of any visual analysis that was conducted that would have concluded that 80-high signs are necessary to adequate identification and that they would be an attractive addition to our communities. Pictures are necessary to determine visual impacts on the environment. There is already sign clutter in Cameron Park and Shingle Springs, and a visual representation of what could occur with adoption of the proposed sign ordinance that allows 80-foot-high signs will likely show that additional very tall signs will exacerbate this situation. The signs depicted below are less than 80 feet high, and they are unnecessarily high for adequate identification. The proposed Sign Ordinance indicates that Highway-50
oriented signs are to be a ministerial action, meaning that if they meet the height, area and setback requirements they cannot be denied. In effect, without a visual analysis of the impacts of these large signs, there is to be no further environmental review.

The State of California provides for small blue signs near freeway off-ramps which provide motorists with information regarding food, fuel and lodging. The use of these signs as a project alternative in the EIR would be appropriate.

The Executive Summary lists project objectives, including:

Promote economically stable and visually attractive communities within the county.
Promote signs and graphics that are attractive, pleasing, and harmonized with the physical character of the structure and environment of surrounding properties.
Protect viewsheds in designated scenic corridors.
Encourage individuality among communities and businesses through signage.

The Executive Summary also points out that the General Plan is proposed to be adopted that will allow billboards to be relocated to outside designated Scenic Corridors. Furthermore, signs along Highway 50 in the scenic corridor are proposed to be shorter than those outside the scenic corridor. A visual representation of what the difference is would help decision makers decide if this proposal is to be adopted.

A study is to be done to indicate if the scenic corridor can be extended to the west of Placerville. However, with the recent addition of offensive billboards in these areas that impede the views of the sierras and other natural features, it is dubious that Highway 50 in the vicinity of Cameron Park and Shingle Springs will be designated as a scenic corridor. But, what does that have to do with making sure that signs along all segments of Highway 50 are attractive? The notion that signs should be more sensitive to their surroundings and not impede the views of the natural environment ONLY IN THE DESIGNATED SCENIC CORRIDORS is offensive. A sign ordinance should require attractive signs that contribute in visually positive ways to all communities in El Dorado County and that do not impede attractive settings. The notion that attractive signs should be provided for along a scenic corridor and less attractive signs may be allowed elsewhere does not take advantage of this opportunity to improve the aesthetic quality of the entire county. The aesthetic impacts of this provision of the Sign Ordinance should not be considered “no impact” or “less than significant impact.”

Cameron Park and Shingle Springs are already riddled with sign clutter, and to allow relocation of billboards to our area solely because it may be outside a designated scenic corridor would further denigrate our skyline and contribute to visual blight.

The proposed Sign Ordinance would allow 20-foot high pole signs on local streets. There should be a visual representation of the result of adopting such a provision. This representation would show that there could be an adverse visual impact, both aesthetically and as a distraction to motorists who would have to take their eyes off the road to view such signs. In addition, the 20-height would likely interfere with tree canopies, which often results in severely pruning trees to make the sign more visible or even removing the tree. A visual representation would reveal that a 6 – 10-foot sign would be more in the line of sight of motorists.

Additional comments from the Cameron Park Design Review Committee may be forthcoming.

Note line of sight of motorists and that the motorists would have to take eyes from the road to read the tallest sign. A picture is worthwhile for determining impacts on the environment.
January 27, 2015

Anne Novotny
El Dorado County, Long Range Planning Division
2850 Fairlane Court
Placerville, CA 95667

Subject: Notice of Preparation of an Environmental Impact Report for the Sign Ordinance Update (SCH# 2014102001) - General Plan Amendment

Dear Anne Novotny,

Thank you for your invitation to consult on the above named project under SB18. And thank you for initiating formal consultations with the United Auburn Indian Community (UAIC) concerning the proposed General Plan Amendment. As you know, the UAIC is comprised of Miwok and Maidu people whose traditional homelands include portions of Placer and Nevada counties, as well as some surrounding areas. The UAIC is concerned about development within its ancestral territory that has potential to impact sites and landscapes that may be of cultural or religious significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

We would like to make a few general points for consideration in developing the scope and content of the General Plan Amendment:

- The UAIC recommends that projects within the General Plan Amendment jurisdiction be designed to incorporate known cultural sites into open space or other protected areas;
- The UAIC is interested in holding conservation easements for culturally significant prehistoric sites;
- The UAIC would like the opportunity to provide Tribal representatives to monitor projects if excavation and data recovery are required for prehistoric cultural sites, or in cases where ground disturbance is proposed at or near sensitive cultural resources;
- The UAIC is interested in receiving cultural materials from prehistoric sites where excavation and data recovery has been performed;
- The UAIC would like to receive copies of environmental notices and documents for projects within the jurisdiction of the General Plan Amendment.

We have reviewed the cultural resources assessment that you provided for the project and would like to arrange a meeting with your department to discuss how potential impacts to cultural resources of importance to the UAIC can best be addressed in any environmental documents. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the documents requested above and consulting on your project. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or by email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,

Gene Whitehouse,
Chairman

CC: Marcos Guerrero, CRM

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