



LOCAL AGENCY FORMATION COMMISSION

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August 7, 2026

El Dorado Hills Community Services District
Stephanie McGann Jantzen
General Manager
1021 Harvard Way
El Dorado Hills, CA 95762
CEQA@edhcsd.org

Re: El Dorado Hills Incorporation – Draft Initial Study/Negative Declaration

Dear Ms. McGann Jantzen:

As a responsible agency pursuant to the California Environmental Quality Act (“CEQA”), El Dorado Local Agency Formation Commission (“El Dorado LAFCO”) appreciates the opportunity to comment on the Draft Initial Study/Negative Declaration (“IS/ND”) prepared by lead agency El Dorado Hills Community Services District (“EDHCS”) for the proposed El Dorado Hills Incorporation Project (“Project”).

El Dorado LAFCO respectfully offers the following comments regarding the IS/ND.

A. Description and Mapping of District Boundaries and Service Areas

Please clarify the relationship among EDHCS, Rolling Hills CSD (“RHCS”), and Marble Mountain Homeowners CSD (“MMHCS”). Please explain that RHCS and MMHCS are not within EDHCS’s sphere of influence, rather, EDHCS’s sphere surrounds, but does not include, those districts. (IS/ND, p. 1).

Please clarify in the project location discussion that the EDHCS-proposed project boundary encompasses EDHCS’s current service area, with the exception of the Marble Valley area, and includes the RHCS service area and the El Dorado Hills Business Park, which is within EDHCS’s sphere of influence but not its current service area. The LAFCO staff-proposed boundary alternative encompasses all of EDHCS’s service area and sphere of influence, together with the RHCS service area and the MMHCS service area. (IS/ND, p. 2). To make these alternatives readily understandable, we recommend that the IS/ND overlay EDHCS’s existing boundary and sphere of influence on the relevant maps and include a comparison map showing the EDHCS-proposed and LAFCO staff-proposed boundary alternatives.

The IS/ND’s discussion of potential Land Use and Planning impacts states, on page 46, that the “proposed LAFCO-preferred Boundary Alternative includes an undeveloped area in Marble Valley

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that is subject to a planning application that is already in process with the County.” Please clarify that the proposed Village of Marble Valley Specific Plan site has been within EDHCSD’s service area since its annexation into the EDHCSD in 2006. Further, please clarify that additional areas in the LAFCO-preferred Boundary Alternative to the north and south are currently within EDHCSD’s sphere of influence, as they were added in 2020 at EDHCSD’s request.

B. Project Description and Post-Incorporation Service Arrangements

Please identify the incorporation and all related changes of organization proposed for approval, including the dissolution of RHCSD and, if applicable, under the selected boundary, MMHCSD. (IS/ND, p. 8).

Please include in the discussion of EDHCSD’s proposed continuation as a subsidiary district all services that would continue in EDHCSD territory outside the proposed City boundary, rather than referring only to the CC&R enforcement and recreation services. Please also clarify, perhaps in the Utilities section of the IS/ND, whether the CSD Subsidiary District would continue to provide its other active services, including cable television franchise administration, street lighting and landscape services, and solid-waste collection, and describe the anticipated post-incorporation service arrangements. (IS/ND, pp. 5, 57).

C. Fire Protection and Wildfire Service Providers

The IS/ND’s discussion of Fire Protection Service on page 6 states that a small portion of the proposed area of incorporation is provided fire protection by the Rescue Fire Protection District. Please clarify that a portion of the LAFCO proposed boundary alternative within the Marble Valley Specific Plan area receives fire protection services from the El Dorado County Fire Protection District. Please also correct the text on IS/ND, page 6: “The proposed area of incorporation and LAFCO Staff Proposed Boundary are almost entirely provided fire protection services by the El Dorado Hills County Water District/~~Fire Protection District and Sphere of Influence~~ El Dorado Hills Fire Department, which cover a larger area than the proposed area of incorporation including areas further to the south.”

The IS/ND’s discussion of potential Public Services impacts states, on page 55, that “The area of incorporation would be serviced by the El Dorado County Sheriff’s Office for police protection services (like via contract with the new City) and by the El Dorado Hills County Water District (El Dorado Hills Fire Department) for fire protection and emergency response. Please clarify that, to a lesser extent, the Rescue Fire Protection District (at the EDHCSD and LAFCO proposed boundary), and potentially the El Dorado County Fire Protection District (LAFCO proposed boundary) will also provide fire protection services.

Finally, the IS/ND’s discussion of potential Wildfire impacts states, on page 68, that wildland fire response responsibility [will move] to local authorities (El Dorado Hills Fire Department and Rescue Fire Department).” Please clarify that a portion of that responsibility could also potentially move to the El Dorado County Fire Protection District (LAFCO proposed boundary).

D. Population and Housing

The IS/ND's discussion of potential Population and Housing impacts states, on page 53, that the "new City will receive its own RHNA allocation as discussed in Section XI above, but it will simply be a portion of the existing County RHNA requirements...." Please add to this discussion to provide the current RHNA allocation for unincorporated El Dorado County (west slope), and a brief explanation as to how RHNA allocations are determined and what factors are considered.

E. Potential Future LAFCO Approvals

The IS/ND's discussion of potential Recreation impacts discusses, on page 57, that the EDHCSD manages recreational facilities and programs. Please clarify as to whether the subsidiary CSD will continue to provide all active EDHCSD services to the areas within the District, but outside of the new City boundary, or just park and recreation services.

Further, the IS/ND's discussion of potential Recreation impacts states, on page 58, that the EDHCSD could "be replaced by a city department, maintained, amended, or disbanded..." Please note in the IS/ND that "disbanding" (dissolution) of the subsidiary EDHCSD or replacement by a city department (through the extension of City services into the unincorporated territory) would first require the new City to apply to LAFCO for approval of both the dissolution and the annexation.

Updated Incorporation Application

After EDHCSD adopts the IS/ND, it should also approve submission of an amended incorporation application to El Dorado LAFCO that reflects the final Project description evaluated in the IS/ND, including any revisions made during the environmental review process.

El Dorado LAFCO appreciates the opportunity to comment and looks forward to working with EDHCSD as the proposal moves forward.

Sincerely,



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