

**Fw: Marble Valley Development Information Workshop Comments**

Aurora M. Osbual <Aurora.Osbual@edcgov.us>

Thu 8/1/2024 2:19 PM

To: Planning Department <planning@edcgov.us>

P.C. 08/08/24

Item # 3

4 pages

📎 1 attachments (18 KB)

August 8 Comments Re MV Workshop.docx;

Sincerely,

**Aurora Osbual**

Clerk of the Planning Commission

Planning Division

**County of El Dorado**

Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

Direct Line: (530) 621-5351

Main Line: (530)-621-5355

[aurora.osbual@edcgov.us](mailto:aurora.osbual@edcgov.us)

---

**From:** Cameron W. Welch <Cameron.Welch@edcgov.us>

**Sent:** Thursday, August 1, 2024 2:15 PM

**To:** Aurora M. Osbual <Aurora.Osbual@edcgov.us>

**Cc:** Ande Flower <Ande.Flower@edcgov.us>

**Subject:** FW: Marble Valley Development Information Workshop Comments

Hi Aurora,

Please find attached comments received for the 8/8 workshop.

Sincerely,

Cameron Welch

El Dorado County Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

(530) 621-5816

[cameron.welch@edcgov.us](mailto:cameron.welch@edcgov.us)



*Elevate to El Dorado*

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**From:** Hope Leja <hleja@sbcglobal.net>  
**Sent:** Wednesday, July 31, 2024 7:57 PM  
**To:** PL-Village of Marble Valley Specific Plan <VMVSP@edcgov.us>  
**Subject:** Marble Valley Development Information Workshop Comments

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Dear Planning Commissioners,

Please see the attached letter regarding comments on the Village of Marble Valley Specific Plan informational workshop. Please acknowledge the receipt of this letter. Thank you.

Sincerely,

Hope Leja

County of El Dorado Planning Commission  
County of El Dorado Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667

July 31, 2024

Subject: Village of Marble Valley Specific Plan Informational Workshop Comments

Dear Planning Commissioners,

This letter is in response to the call for comments regarding the August 8, 2024 Informational Workshop for the Marble Valley Specific Plan.

My concerns regarding this Project are as follows:

- 1. Inconsistent with the adopted El Dorado County General Plan land use, zoning, and established Community Regions:** Significant changes would need to be made to the existing General Plan and land use designations to accommodate this project. The density of the project does not match the RE5 designation of the General Plan for the area and of the majority of the developments adjacent to the project.
- 2. Transportation and Circulation:** The impact of this project on the existing road system will be immense. The directly affected access roads including Highway 50, Bass Lake Road, Flying C Road, Cambridge Road, Deer Creek Road, and the interchanges at Highway 50 and Bass Lake and Highway 50 and Cambridge Road and the intersections of Marble Valley Road and Bass Lake, Cambridge and Flying C, have not had improvements identified or designated. No specifics were given as to how the circulation would be improved. Some mention was made of Marble Mountain and Marble Ridge, but not in any detail. What do these improvements entail? When will these occur during the project? No road improvement schedule was provided. The increased volume of traffic from this project will put an added burden on these already heavily traveled roadways, creating a congested and unsafe situation.

The addition of schools and commercial development in the project will impact the surrounding roadways as well. Twice daily drop off and pick up traffic as well as extracurricular activity traffic has a significant possibility of impacting roadways outside the project. Having retail and other commercial development will draw traffic from outside the community adding to the congestion on outside of the project roadways.

- 3. Emergency Vehicle Access (EVA) and Evacuation Routes:** According to the Emergency Access routes map (Torrence Planning June 2024) distributed at a Marble Valley informational meeting at Cameron Park CSD, there appears to be access to five evacuation routes including one emergency vehicle access route for the Lime Rock Valley and Village of Marble Valley developments. The Draft EIR does not identify the location of these EVA's nor describe details and improvements of the routes if any. Some if not all of the routes appear to be on roads in adjoining developments including on small private and gated roads. Unauthorized use and access has not been addressed. Another aspect to consider and is the impact of the additional traffic on these limited capacity private roads during an evacuation, and how it might hinder the residents of these communities to evacuate. This might lead to disastrous results.

4. **Water Resources:** El Dorado Irrigation District (EID) will be providing the potable water supply for the project. Per the maps provided, EID has proposed adding a water main on Ridge Pass Road through the private community of Cameron Estates to supply water to the Marble Valley development. The Cameron Estates Community Services District (CECSD) has authority over the roadways in Cameron Estates, and has not been contacted by EID or the Marble Valley developers for permissions to access the CECSD roads to construct this water main. This would need to be done before the water supply could be assured.

As EID has in recent years directed customers to conserve water due to the potential of inadequate supply especially in drought years, their assurance that there is an adequate supply for this and other proposed developments is suspect. The possibility exists that there will not be an adequate water supply for this project without consequences to existing EID customers. Another concern on water supply with a project of this magnitude is the effect of this development on the surrounding community's wells.

5. **Emergency Services: Sheriff Services:** The Draft EIR acknowledges that the El Dorado County Sheriff department does not currently meet the El Dorado County service ratio requirements for providing police protection. The increased population that this development brings would further add to this problem and would contribute to delayed response times.

**Fire Services:** This project is within a high fire risk area. The western portion of the development would be serviced by El Dorado Hills Fire department (Station 86) which according to this Draft EIR would have sufficient response times. However, the eastern portion of the development would be serviced by El Dorado County Fire (Station 28) which would not have sufficient response times. This project could have the potential to add to the insufficient response times due to increased population.

6. **Other areas of concern:**

**Decreased wildlife habitat:** The construction of the project will disturb the wildlife and interrupt wildlife corridors resulting in increased pressures on native species even with mitigation.

**Oak Woodlands:** Oak trees and other native plants will be destroyed in the construction of the area. Mitigation measures to plant oak trees in areas far from the project will not mitigate for the damage that occurs on site.

**Lighting, glare, and nighttime lighting:** This development will cause significant increases in lighting, glare, visual disturbance and nighttime lighting, all of which will have negative impacts on the surrounding communities.

Sincerely,

Hope Leja  
3797 Lariat Dr  
Cameron Park, CA 95682

**Fw: Lime Rock Valley Specific Plan Informational Workshop Comments**

Aurora M. Osbual <Aurora.Osbual@edcgov.us>

Thu 8/1/2024 2:20 PM

To: Planning Department <planning@edcgov.us>

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Sincerely,

**Aurora Osbual**

Clerk of the Planning Commission

Planning Division

**County of El Dorado**

Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

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**From:** Cameron W. Welch <Cameron.Welch@edcgov.us>

**Sent:** Thursday, August 1, 2024 2:16 PM

**To:** Aurora M. Osbual <Aurora.Osbual@edcgov.us>

**Cc:** Ande Flower <Ande.Flower@edcgov.us>

**Subject:** FW: Lime Rock Valley Specific Plan Informational Workshop Comments

Hi Aurora,

Please find attached comments received for the 8/8 workshop.

Sincerely,

Cameron Welch

El Dorado County Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

(530) 621-5816

[cameron.welch@edcgov.us](mailto:cameron.welch@edcgov.us)



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**From:** Hope Leja <hleja@sbcglobal.net>

**Sent:** Wednesday, July 31, 2024 10:07 PM

**To:** PL-Lime Rock <LRVSP@edcgov.us>

**Subject:** Lime Rock Valley Specific Plan Informational Workshop Comments

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Dear Planning Commissioners,

Please see the attached letter regarding comments on the Lime Rock Valley Specific Plan informational workshop. Please acknowledge the receipt of this letter. Thank you.

Sincerely,

Hope Leja

County of El Dorado Planning Commission  
County of El Dorado Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667

July 31, 2024

Subject: Lime Rock Valley Specific Plan Informational Workshop Comments

Dear Planning Commissioners,

This letter is in response to the call for comments regarding the August 8, 2024 Informational Workshop for the Lime Rock Valley Specific Plan.

My concerns regarding this Project are as follows:

- 1. Inconsistent with the adopted El Dorado County General Plan land use, zones, and established Community Regions:** Significant changes would need to be made to the existing General Plan and land use designations to accommodate this project. This project does not match the General Plan designation for density in this project area and the majority of developments adjacent to the project. (Cameron Estates, Royal Equestrian Estates, Ryan Ranch and Marble Mountain.). The potential for additional dwelling units would add to the density of the project.
- 2. Transportation and Circulation:** The DEIR for this development identifies one entrance/exit into the project area. From past experience with development hearings in the county, I believe El Dorado County Fire would require more than one entry point into the project. The most likely additional point of entry/exit would be Shingle Lime Mine Road. This is not addressed in the DEIR. Shingle Lime Mine Road and Durock Road do not have the capacity to handle the additional traffic from this project and significant improvements would be needed.

A delivery schedule was not identified nor provided for offsite road improvements of the Bass Lake Road, Highway 50, Cambridge Rd, Flying C Rd. and Marble Valley Rd intersections. What do these improvements entail? When will these occur during the project? The increased volume of traffic from this project will put an added burden on these already heavily traveled roadways, creating a congested and unsafe situation.

Looking at the widespread impact of the Lime Rock Valley project on adjacent roadways due to increased traffic volume, South Shingle Road, Cameron Park Drive at the intersection with Highway 50, Durock Road and Shingle Lime Mine Road will be affected. This will significantly impact the traffic flow in the area.

The improvement of the intersection of Latrobe Road and Town Center Parkway is mentioned as one of the transportation mitigations. It is unclear as how this intersection

will be impacted by this development, let alone more so than the Cameron Park Drive interchange which has no mitigation mentioned.

The VMT of this project exceeds the county standards. One of the mitigation measures mentioned is the addition of 22,000 square feet of commercial and retail space which would attract customers from outside the development therefore adding to the vehicle traffic (and VMT) to roadways outside the project. This proposed commercial and retail space is not traffic mitigation, it is a traffic generator.

3. **Emergency Vehicle Access (EVA) and Evacuation Routes:** According to the Emergency Access routes map (Torrence Planning June 2024) distributed at a Marble Valley informational meeting at Cameron Park CSD, there appears to be access to 3 evacuation routes for the Lime Rock Valley developments. Only 2 were identified in the Draft EIR. The location of these EVA's was not specified nor described. Details of the conditions of the roads and improvements of the routes were not addressed. Two of the routes are on roads in adjoining developments (Deer Creek Road and Amber Fields Road). A portion of Deer Creek Road and subsequently Flying C Road are roads in the authority of Cameron Estates CSD, a private, gated community. The use of Deer Creek Road has not been addressed with, nor authorized by, the Cameron Estates CSD. These roads would not be suitable for the excess traffic in the case of emergency as they are narrow and not to county standards. If these were used as EVA for Lime Rock Valley, the safety of residents of the existing community would be compromised as traffic flow would be greatly impacted.
4. **Water Resources:** El Dorado Irrigation District (EID) will need to annex this project in order to provide a potable water supply. Some uncertainty exists regarding adequate supply for this project and various other projects proposed by the county. The State Water Board would need to approve in order for EID to secure additional water assets, which is not a certainty.

The Lime Rock Valley DEIR does not specify the route of the potable water transmission line to the project. The Marble Valley Specific Plan notes that this line will run down Ridge Pass Rd which is a private road in gated Cameron Estates which has its own Community Services District (CECSD). The CECSD was not notified of this line under its roadway, has not been listed as an approving agency, and was not contacted for use of CECSD roads. This needs to be addressed.

5. **Emergency Services: Sheriff Services:** The draft EIR acknowledges that the sheriff department does not currently meet the El Dorado County service ratio requirements for providing police protection, and does not meet required response times. The increased population that this development brings would further add to this problem.
6. **Fire Services:** This project is within a high fire risk area. At the present time the area is within the El Dorado County Fire District (Station 28) with Cal Fire (Cameron Park) as back up. Currently, the response time is insufficient. The addition of this project will compound an already inadequate response time, increasing the risk to the community.



7. **Other areas of concern:**

**Decreased wildlife habitat:** The construction of the project will disturb wildlife and interrupt wildlife corridors resulting in reduction of native species.

**Oak Woodlands:** Oak trees, wetlands, riparian areas, and native plants will be destroyed in the construction of this project. Mitigation measures are not adequate. Contributing funds as a mitigation measure will do nothing to rectify the destruction these precious resources.

**Lighting, glare, and nighttime lighting:** The area of this project is rural with very little light pollution obstructing the night sky. The day and night lighting from this project will contribute to increased glare and light pollution which would affect the surrounding communities.

Thank you for the opportunity to address these concerns regarding the Lime Rock Valley development.

Sincerely,

Hope Leja  
3797 Lariat Dr  
Cameron Park, CA 95682

**Fw: Comments Regarding August 8 Marble Valley Specific Plan Workshop**

Aurora M. Osbual <Aurora.Osbual@edcgov.us>

Thu 8/1/2024 2:20 PM

To: Planning Department <planning@edcgov.us>

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**County of El Dorado**

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2850 Fairlane Court

Placerville, CA 95667

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**From:** Cameron W. Welch <Cameron.Welch@edcgov.us>

**Sent:** Thursday, August 1, 2024 2:15 PM

**To:** Aurora M. Osbual <Aurora.Osbual@edcgov.us>

**Cc:** Ande Flower <Ande.Flower@edcgov.us>

**Subject:** FW: Comments Regarding August 8 Marble Valley Specific Plan Workshop

Hi Aurora,

Please find attached comments received for the 8/8 workshop.

Sincerely,

Cameron Welch

El Dorado County Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

(530) 621-5816

[cameron.welch@edcgov.us](mailto:cameron.welch@edcgov.us)



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**From:** Hope Leja <hleja@sbcglobal.net>  
**Sent:** Thursday, August 1, 2024 11:36 AM  
**To:** PL-Lime Rock <LRVSP@edcgov.us>  
**Subject:** Comments Regarding August 8 Marble Valley Specific Plan Workshop

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Dear Planning Commissioners,

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Sincerely,

Hope Leja

County of El Dorado Planning Commission  
County of El Dorado Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667

July 31, 2024

Subject: Lime Rock Valley Specific Plan Informational Workshop Comments

Dear Planning Commissioners,

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My concerns regarding this Project are as follows:

- 1. Inconsistent with the adopted El Dorado County General Plan land use, zones, and established Community Regions:** Significant changes would need to be made to the existing General Plan and land use designations to accommodate this project. This project does not match the General Plan designation for density in this project area and the majority of developments adjacent to the project. (Cameron Estates, Royal Equestrian Estates, Ryan Ranch and Marble Mountain.). The potential for additional dwelling units would add to the density of the project.
- 2. Transportation and Circulation:** The DEIR for this development identifies one entrance/exit into the project area. From past experience with development hearings in the county, I believe El Dorado County Fire would require more than one entry point into the project. The most likely additional point of entry/exit would be Shingle Lime Mine Road. This is not addressed in the DEIR. Shingle Lime Mine Road and Durock Road do not have the capacity to handle the additional traffic from this project and significant improvements would be needed.

A delivery schedule was not identified nor provided for offsite road improvements of the Bass Lake Road, Highway 50, Cambridge Rd, Flying C Rd. and Marble Valley Rd intersections. What do these improvements entail? When will these occur during the project? The increased volume of traffic from this project will put an added burden on these already heavily traveled roadways, creating a congested and unsafe situation.

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The improvement of the intersection of Latrobe Road and Town Center Parkway is mentioned as one of the transportation mitigations. It is unclear as how this intersection

will be impacted by this development, let alone more so than the Cameron Park Drive interchange which has no mitigation mentioned.

The VMT of this project exceeds the county standards. One of the mitigation measures mentioned is the addition of 22,000 square feet of commercial and retail space which would attract customers from outside the development therefore adding to the vehicle traffic (and VMT) to roadways outside the project. This proposed commercial and retail space is not traffic mitigation, it is a traffic generator.

3. **Emergency Vehicle Access (EVA) and Evacuation Routes:** According to the Emergency Access routes map (Torrence Planning June 2024) distributed at a Marble Valley informational meeting at Cameron Park CSD, there appears to be access to 3 evacuation routes for the Lime Rock Valley developments. Only 2 were identified in the Draft EIR. The location of these EVA's was not specified nor described. Details of the conditions of the roads and improvements of the routes were not addressed. Two of the routes are on roads in adjoining developments (Deer Creek Road and Amber Fields Road). A portion of Deer Creek Road and subsequently Flying C Road are roads in the authority of Cameron Estates CSD, a private, gated community. The use of Deer Creek Road has not been addressed with, nor authorized by, the Cameron Estates CSD. These roads would not be suitable for the excess traffic in the case of emergency as they are narrow and not to county standards. If these were used as EVA for Lime Rock Valley, the safety of residents of the existing community would be compromised as traffic flow would be greatly impacted.
4. **Water Resources:** El Dorado Irrigation District (EID) will need to annex this project in order to provide a potable water supply. Some uncertainty exists regarding adequate supply for this project and various other projects proposed by the county. The State Water Board would need to approve in order for EID to secure additional water assets, which is not a certainty.

The Lime Rock Valley DEIR does not specify the route of the potable water transmission line to the project. The Marble Valley Specific Plan notes that this line will run down Ridge Pass Rd which is a private road in gated Cameron Estates which has its own Community Services District (CECSD). The CECSD was not notified of this line under its roadway, has not been listed as an approving agency, and was not contacted for use of CECSD roads. This needs to be addressed.

5. **Emergency Services: Sheriff Services:** The draft EIR acknowledges that the sheriff department does not currently meet the El Dorado County service ratio requirements for providing police protection, and does not meet required response times. The increased population that this development brings would further add to this problem.
6. **Fire Services:** This project is within a high fire risk area. At the present time the area is within the El Dorado County Fire District (Station 28) with Cal Fire (Cameron Park) as back up. Currently, the response time is insufficient. The addition of this project will compound an already inadequate response time, increasing the risk to the community.

7. **Other areas of concern:**

**Decreased wildlife habitat:** The construction of the project will disturb wildlife and interrupt wildlife corridors resulting in reduction of native species.

**Oak Woodlands:** Oak trees, wetlands, riparian areas, and native plants will be destroyed in the construction of this project. Mitigation measures are not adequate. Contributing funds as a mitigation measure will do nothing to rectify the destruction these precious resources.

**Lighting, glare, and nighttime lighting:** The area of this project is rural with very little light pollution obstructing the night sky. The day and night lighting from this project will contribute to increased glare and light pollution which would affect the surrounding communities.

Thank you for the opportunity to address these concerns regarding the Lime Rock Valley development.

Sincerely,

Hope Leja  
3797 Lariat Dr  
Cameron Park, CA 95682

**FW: Letter Contesting the Village of Marble Valley Specific Plan Project**

PL-Village of Marble Valley Specific Plan <VMVSP@edcgov.us>

Thu 8/1/2024 2:33 PM

To: Planning Department <planning@edcgov.us>

P.C. 08/08/24  
Item #3  
5 Pages

📎 1 attachments (437 KB)

Moonitz letterplanvmvsp.pdf;

Hello,

Please find attached comments received for the 8/8 workshop.

Sincerely,

Cameron Welch  
El Dorado County Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667  
(530) 621-5816  
cameron.welch@edcgov.us



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**From:** Karen Moonitz <bluemoonorchids@prodigy.net>  
**Sent:** Thursday, August 1, 2024 2:15 PM  
**To:** PL-Village of Marble Valley Specific Plan <VMVSP@edcgov.us>  
**Cc:** Karen Moonitz <bluemoonorchids@prodigy.net>; Cameron Estates <cecsd@att.net>  
**Subject:** Letter Contesting the Village of Marble Valley Specific Plan Project

---

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Hello El Dorado County Planning Commission;

Please find attached our letter contesting the Village of Marble Valley Specific Plan Project. Please accept this letter as our comments to be reviewed and filed for your upcoming Planning Commission scheduled meeting/workshop on August 8, 2024 regarding the Village of Marble Valley Specific Plan Project. Thank you for your time and consideration of our comments.

Sincerely,

Karen Moonitz (CECSO General Manager, Retired)  
Kenneth Moonitz

24-1388 Public Comment  
PC Rcvd 08-01-24

**To: El Dorado County Planning Commission**

August 1, 2024

Dear Planning Commissioners;

We sent the following letter (included below) to Mr. Cameron Welch, County Planner at El Dorado County, Planning and Building Department regarding the Village of Marble Valley Specific Plan Draft Environmental Impact Report (VMVSP DEIR). Please accept the entirety of this letter as our comments to be reviewed and filed at your upcoming Planning Commission scheduled meeting/workshop on August 8, 2024, regarding the VMVSP Project.

The applicants had an approved Marble Valley Master Plan (MVMP) that respected the 2004 requirements of the El Dorado County General Plan. We implore El Dorado County Planning Commission to reject the VMVSP Project and the zoning changes, and General Plan changes the project applicant is requesting. Please require them to follow the current 2004 General Plan requirements, which reflect the zoning of the already developed areas that border this project. Sincerely,

Karen Moonitz (CECSD General Manager, Retired)  
Kenneth Moonitz  
4692 Longview Road  
Cameron Park, CA 95682  
[bluemoonorchids@prodigy.net](mailto:bluemoonorchids@prodigy.net)

June 30, 2024

Cameron Welch  
El Dorado County, Planning and Building Department  
Planning Division  
2850 Fairlane Court, Building C  
Placerville, CA 95667

Subject: Village of Marble Valley Specific Plan Draft Environmental Impact Report Comments.

Dear Mr. Welch:

Please respond to and record these comments to the Draft Environmental Impact Report (DEIR) for the Village of Marble Valley Specific Plan (VMVSP Project or Project).

My husband and I are residents in Cameron Estates Community Services District (CECSD) in Cameron Park, El Dorado County, California, and have been for over 20 years. We escaped to this community from the crowding and sprawl of the Bay Area because of the open spaces and



rural community atmosphere we found here. Cameron Park is truly a “Special Place to Live” and we would like it to stay that way. We maintain that the Project Applicant(s) for VMVSP Project, and El Dorado County should adhere to what is already allowed in the current General Plan. We are opposed to this VMVSP Project and find it unacceptable for El Dorado County, and its’ citizens for several reasons:

1. This VMVSP Project conflicts with the adopted El Dorado County General Plan and is inconsistent with the urban/suburban boundaries of the adopted El Dorado County General Plan, including limiting urban/suburban development to the established Community Regions.
2. Figure 2-7 shows Lime Rock Valley Road connected to a Road Extension to Deer Creek Road that the Project would build. This would provide Marble Valley residents’ access to CECSO’s private Deer Creek Road via that Extension. This is unacceptable for the residents of CECSO. How does the Project propose to prevent residents of VMVSP Project from accessing CECSO’s private roads? In the event of an emergency where evacuation is necessary, residents of VMVSP Project could access CECSO’s roads via this new Deer Creek Road extension. What is to stop VMVSP residents from flooding CECSO’s roads to the point that residents of CECSO are seriously impeded in, or cannot evacuate? This would also exacerbate delay for entry needed by emergency vehicles trying to get into CECSO. This needs to be addressed and clarified.
3. In Figure 2-12 Interim Phase I Potable Water Improvements of the VMVSP DEIR a blue dotted line is identified as “Proposed 19,500 LF of 24” Potable Water Main”. Figure 2-13 Offsite Infrastructure Improvements shows the same placement of a blue dotted line. This line is placed on Lariat Road, Ridgepass Road, Strolling Hills Road and Flying C Road, all private roads located within Cameron Estates Community Services District. There is also a placement of a “Proposed Pressure Reducing Station-Location Determined by EID” on Flying C Court, a road that is also within CECSO. There is no discussion in the DEIR of notifying and seeking approval from the CECSO’s Board of Directors, for the placement of this “proposed” water main and “Pressure Reducing Station”. The Project applicant will need to get approval from the CECSO’s Board of Directors, such as an Encroachment Permit or Road Use Permit, to disrupt its private roads to place a water main, or any utility, for the Village of Marble Valley. The CECSO is a California Special District, and specifically a Community Services District whose service is to build and maintain CECSO’s private roads and easements for the residents of CECSO. The CECSO has authorities and powers under California Government Code 61000. It is also necessary to add CECSO, under section **2.4 Required Approvals**, as a District responsible for issuing permits and approvals to proceed with this proposed project.
4. The VMVSP Draft EIR does not address the existing wildfire conditions, including location and extent of CalFire-designated fire hazards severity zones, location and extent of wildland urban interfaces, and does not address increased wildfire risks that may occur from construction, operation of residential and nonresidential uses, does not address where Emergency Vehicle Access (EVA) points are located and whether they are adequate in the event of a wildfire, and does not address how the project would adversely impact evacuation routes, including

increased delays or lack of access to routes due to project traffic, of existing residents in the event of an emergency, including wildfire.

The only mitigation identified for the project impact is the preparation of a wildfire safety plan, with several general requirements identified. The mitigation does not establish any standards to ensure wildfire risks are decreased to a less than significant level, including addressing extent of fuel management, timing of fuel management, that adequate water sources and adequate water pressure are available to serve the Project AND existing users in the event of a wildfire, and how the plan will be implemented. The analysis does not demonstrate that measures would be implemented that would reduce wildfire risks associated with development and operation of the project to surrounding residents, uses, and lands.

At a minimum, the Draft EIR must address the environmental impacts of construction and operation of the Project, including establishment of buffer zones, maintenance of wildland areas to reduce wildfire risks, evacuation, feasible EVAs, and identify and consider mitigation that allows for review of the language of the actual mitigation measures in the VMVSP.

5. The Project Description is missing details of when and how the project will be implemented, where the EVA points and routes will be located. The Project Description fails to describe the extent, intended use, and feasibility of proposed EVA points and routes. On page 3.7-23, it identifies five EVAs, on page 3.14-18 only one EVA point is identified with the potential for a second EVA, and Figure 2-7 only identifies one EVA. There is no description of how and where each EVA will connect to existing roads and what extensions or roadway improvements are necessary for the EVAs. There is also no discussion if any EVAs that are proposed on private property have been accepted or approved by the property owner(s) or Districts abutting it. The Draft EIR lacks analysis of the EVAs, including any improvements for the EVAs and routes.

The Project Description does not identify where and how the access points between the project site and roads serving the project will be designed, including design of intersections with existing roads that will provide access to the project site, including the project access point at Bass Lake Road and project access point at Cambridge Road/Flying C Road.

Assuming 8,000 cars for 4,000 homes, how many cars will be stacked up and blocking Hwy 50, already at peak at the Bass Lake exit, at peak traffic times? And, when that exit is backed up, it makes sense that the drivers will go on to the next exit at Cambridge, and if that ramp is also backed up, then the drivers may go on to the next exit at Cameron Park Dr. and then proceed through our private roads in Cameron Estates to get to their homes. This is not acceptable.

6. The VMVSP DEIR states that approximately 65,000 to 75,000 acre feet of water will be needed for this community per year. Where will this water come from and how will it be sustained? The DEIR does not address any solution to the water shortage in the area and in the county in general.

7. The amount of Heritage Oaks that the Project plans to remove is Significant and cannot be mitigated to a less than significant Level, there is No mitigation sufficient to replace their

removal. They are essential for a healthy oak woodland habitat. The original, approved Marble Valley Master Plan (MVMP) with approximately 400 homes would help to preserve their necessity and beauty.

Finally, this Draft EIR prepared for the Village of Marble Valley Specific Plan is inadequate. The Draft EIR does not provide adequate information regarding the environmental setting, the project components, and the impacts anticipated to occur with development of the project. The Draft EIR does not address how mitigation measures will reduce impacts and does not provide adequate detail to ensure that mitigation measures are implemented for all phases of the project.

Please respect the General Plan we have in place. The original MVMP is an approved plan that reflects our current General Plan with land that is zoned for much less density than the current applicant(s) for the VMVSP are presenting. Their approved MVMP reflects the zoning of the already developed areas that border this project.

Sincerely,

Karen Moonitz (CECSD General Manager, Retired)  
Kenneth Moonitz

**FW: Letter Contesting the Lime Rock Valley Specific Plan Project**

PL-Lime Rock <LRVSP@edcgov.us>

Thu 8/1/2024 2:32 PM

To: Planning Department <planning@edcgov.us>

P.C. 08/08/24  
Item #3  
6 Pages

1 attachments (548 KB)  
MoonitzplanLRV letter.pdf;

Hello,

Please find attached comments received for the 8/8 workshop.

Sincerely,

Cameron Welch  
El Dorado County Planning and Building Department  
2850 Fairlane Court  
Placerville, CA 95667  
(530) 621-5816  
cameron.welch@edcgov.us



*Flourish to El Dorado*  
**A Great Place to Live, Work & Play**

**From:** Karen Moonitz <bluemoonorchids@prodigy.net>  
**Sent:** Thursday, August 1, 2024 2:20 PM  
**To:** PL-Lime Rock <LRVSP@edcgov.us>  
**Cc:** Karen Moonitz <bluemoonorchids@prodigy.net>; Cameron Estates <cecsd@att.net>  
**Subject:** Letter Contesting the Lime Rock Valley Specific Plan Project

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Hello El Dorado County Planning Commission;

Please find attached our letter contesting the Lime Rock Valley Specific Plan Project. Please accept this letter as our comments to be reviewed and filed for your upcoming Planning Commission scheduled meeting/workshop on August 8, 2024 regarding the Lime Rock Valley Specific Plan Project. Thank you for your time and consideration of our comments.  
Sincerely,

Karen Moonitz (CECSO General Manager, Retired)  
Kenneth Moonitz  
Hello El Dorado County Planning

**To: El Dorado County Planning Commission**

August 1, 2024

Dear Planning Commissioners;

We sent the following letter (included below) to Mr. Cameron Welch, County Planner at El Dorado County, Planning and Building Department regarding the Lime Rock Valley Specific Plan Draft Environmental Impact Report (LRVSP DEIR). Please accept the entirety of this letter as our comments to be reviewed and filed at your upcoming Planning Commission scheduled meeting/workshop on August 8, 2024, regarding the LRVSP Project.

The applicants had an approved Marble Valley Master Plan and Lime Rock Valley, which respected the 2004 requirements of the El Dorado County General Plan. We implore El Dorado County Planning Commission to reject the LRVSP Project and the zoning changes, and General Plan changes the project applicant is requesting. Please require them to follow the current 2004 General Plan requirements, which reflect the zoning of the already developed areas that border this project.

Sincerely,

Karen Moonitz (CECSD General Manager, Retired)  
Kenneth Moonitz  
4692 Longview Road  
Cameron Park, CA 95682  
[bluemoonorchids@prodigy.net](mailto:bluemoonorchids@prodigy.net)

July 21, 2024

Cameron Welch  
El Dorado County, Planning and Building Department  
Planning Division  
2850 Fairlane Court, Building C  
Placerville, CA 95667

Subject: Lime Rock Valley Specific Plan Draft Environmental Impact Report Comments.

Dear Mr. Welch:

Please respond to and record these comments to the Draft Environmental Impact Report (DEIR) for the Lime Rock Valley Specific Plan (LRVSP Project or "Project").

My husband and I are residents in Cameron Estates Community Services District (CECSD or District) in Cameron Park, El Dorado County, California, and have been for over 20 years. We

escaped to this community from the crowding and sprawl of the Bay Area because of the beauty of open spaces and rural community atmosphere we found here. Cameron Park is truly a "Special Place to Live" and we would like it to stay that way. We maintain that the Project Applicant(s) for LRVSP Project, and El Dorado County should adhere to what is already allowed in the current General Plan. We are opposed to this LRVSP Project and find it unacceptable for El Dorado County, and its' citizens for several reasons:

1. This LRVSP Project conflicts with the adopted El Dorado County General Plan and is inconsistent with the urban/suburban boundaries of the adopted El Dorado County General Plan, including limiting urban/suburban development to the established Community Regions. This proposed Project is southwest of CECSA's boundary. The majority of the lots in this District are zoned RE-5 and no less, some are 10, 20 and 40 acre lots, but cannot be divided to less than 5 acre parcels. The proposal for 800 units on 358 acres of the 740 acres available in the plan is incompatible with the current El Dorado County General Plan and our District's rural designation and aesthetics. In several areas in the LRVSP DEIR there are references and assumptions made that the Village of Marble Valley Specific Plan Project (VMVSP) will be built first and this "Project" will connect to certain infrastructure and services built for the VMVSP Project. This DEIR does not specify how the LRVSP project will be built, nor what impacts building the "Project" on its own will affect the surrounding communities and environment. A thorough DEIR should evaluate all the impacts of building the LRVSP project on its own. I will highlight the many that I found needing such studies a DEIR on this project should provide.

2. In **Figure 2-13 Offsite Infrastructure Improvements** of the LRVSP DEIR a blue dotted line is identified as "Interim Phase I Potable Water Improvements". This line is placed on Lariat Road, Ridgepass Road, Strolling Hills Road and Flying C Road, all private roads located within Cameron Estates Community Services District. On page 2-12 of the DEIR a bullet point confirms this as well as it notes to "Construct a new 24-inch transmission main from the intersection of Cameron Park Drive and Coach Lane to the VMVSP boundary ...". The only way to build the 24 inch water main from Coach Lane to connect to the existing 10 inch line in Cambridge Road is to build it on the CECSA's roads. On page 2-9 under **Utility Plan**; a sentence states "Transmission mains would be **within** (my emphasis, this tells me the CECSA Roads will be torn up to place the water main for VMVSP) the roadways and would connect to the existing system via Lime Rock Valley Road through the proposed VMVSP area." Additionally, on page 2-12 of the DEIR a bullet point notes to "Construct approximately three new pressure-reducing stations with locations to be determined with EID input at a later date." One of the "Proposed Pressure Reducing Station-Location Determined by EID" is located on Flying C Court, a road that is also within CECSA boundaries. There is No discussion in the DEIR of notifying and seeking approval from the CECSA's Board of Directors, for the placement of this 24 inch water main and "Pressure Reducing Station" which the LRVSP describes will be built on the CECSA's roads. The Project applicant will need to get approval from the CECSA's Board of Directors, such as an Encroachment Permit or Road Use Permit, to disrupt its private roads to place a water main, or any utility, for the benefit of LRVSP. The CECSA is a California Special District, and specifically a Community Services District whose service is to build and maintain CECSA's private roads and easements for the residents of CECSA. The CECSA has authorities and powers under California

Government Code 61000 et seq. It is also necessary to add CECSD, under section **2.4 Required Approvals** (Pages; ES-9, 10, 2-13, 14), as a District responsible for issuing permits and approvals to proceed with this proposed project.

On page 2-9 a sentence states; "However, if VMVSP is not constructed prior to the LRVSP, Lime Rock Valley Road and the transmission main would be constructed by the LRVSP to provide water service to the project area." This is evidence that the DEIR should evaluate all the impacts of building the LRVSP project as a stand-alone project.

3. The LRVSP Draft EIR does not address the existing wildfire conditions, including location and extent of CalFire-designated fire hazards severity zones, location and extent of wildland urban interfaces, and does not address increased wildfire risks that may occur from construction, operation of residential and nonresidential uses. The only mitigation identified for the project impact is the preparation of a Wildfire Safety Plan (page ES-30), with several general requirements identified. This is Not a sufficient Mitigation Measure to remove the Significant Impact to a Less than Significant Impact. The mitigation does not establish any standards to ensure wildfire risks are decreased to a less than significant level, including addressing extent of fuel management, timing of fuel management, that adequate water sources and adequate water pressure are available to serve the Project AND existing users in the event of a wildfire, and how the plan will be implemented. The analysis does not demonstrate what measures would be implemented that would reduce wildfire risks associated with development and operation of the project to surrounding residents, uses, and lands.

The DEIR does not address whether the Emergency Vehicle Access (EVA) "only" roads, Shingle Lime Mine Road and Amber Fields Road (shown on Fig. 2-8) are accessible and/or adequate in the event of a wildfire, and does not address how the project would adversely impact evacuation routes, including increased delays or lack of access to routes due to project traffic, of existing residents in the event of an emergency, including wildfire. There is also no discussion if any EVAs that are proposed on private property have been accepted or approved by the property owner(s) or District(s) that may own those roads. The Draft EIR lacks analysis of the EVAs, including any improvements for the EVAs and routes.

At a minimum, the Draft EIR must address the environmental impacts of construction and operation of the Project, including establishment of buffer zones, maintenance of wildland areas to reduce wildfire risks, evacuation, feasible EVAs, and identify and consider mitigation that allows for review of the language of the actual mitigation measures in the LRVSP.

Under the Project Description in the Wildland Fire Evacuation Risk Report (found in appendices M,N) it is noted that: "However, the roadway and associated water line are not currently constructed and if the LRVSP is constructed before the VMVSP property, the LRVSP will have to construct these improvements to provide roadway connectivity and water to the LRVSP development." More evidence that the DEIR must evaluate all the impacts of building the LRVSP project as a stand-alone project.

4. The Project Description is missing details of when and how the project will be implemented. The Project Description does not identify where and how the access points between the project site and roads serving the project, such as Marble Valley Parkway, Marble Lake Boulevard and the section of Lime Rock Valley Road to intersect with Marble Lake Boulevard (all to be built for the VMVSP project), will be designed if this "Project" is built before VMVSP. It does not define the design of intersections with existing roads that will provide access to the project site, including the project access point at Bass Lake Road and project access point at Cambridge Road/Flying C Road (part of which is owned by the CECSD), via Marble Valley Parkway. The DEIR provides a bullet point on page 2-12 that states: "Improve the Bass Lake Road/US 50 Interchange. Construct a Type L-9 configuration, consisting of a westbound loop on-ramp and slip-on and off-ramps in the eastbound direction and improve eastbound ramp intersection. But I find no designs or analysis in the DEIR for building this. The DEIR lacks analysis of the access points, including any improvements or alternative routes. Additionally the LRVSP DEIR assumes these roads will be built when the VMVSP project builds out. Again this "Project" DEIR must evaluate all the impacts of building the LRVSP as a stand-alone project.

Assuming 1,600 cars for 800 homes, how many cars will be stacked up and blocking Hwy 50, already at peak at the Bass Lake exit, at peak traffic times? And, when that exit is backed up, it makes sense that the drivers will go on to the next exit at Cambridge, and if that ramp is also backed up, then the drivers may go on to the next exit at Cameron Park Dr. and then proceed through our private roads in Cameron Estates to get to their homes. This is not acceptable. The DEIR lacks studies and analysis for the impact on Highway 50, and Bass Lake Road, Cambridge Road, and Cameron Park Road interchanges by adding this or more amounts of traffic to an already strained highway infrastructure.

5. The amount of Heritage Oaks that the Project plans to remove is Significant and cannot be mitigated to a less than significant Level, there is No mitigation sufficient to replace their removal. They are essential for a healthy oak woodland habitat. Additionally, there is No mitigation sufficient to replace the permanent loss of Riparian Woodland habitats.

Finally, this Draft EIR prepared for the Lime Rock Valley Specific Plan is inadequate. The Draft EIR does not provide adequate information regarding the project as a stand-alone project in regards to environmental setting, the project components, and the impacts anticipated to occur with development of the project. The Draft EIR does not address how mitigation measures will reduce impacts and does not provide adequate detail to ensure that mitigation measures are implemented for all phases of the project. A section of the LRVSP DEIR provides the evidence that this Project needs to be considered, described, studied, and analyzed as a stand-alone project on page 2-11: **Offsite Improvements without Village Of Marble Valley Specific Plan:** "If the proposed project is constructed after VMVSP, it would tie into infrastructure improvements completed for VMVSP and water and recycled water (potentially) transmission and utility lines would be constructed within the existing Shingle Lime Mine Road. If the proposed project is approved and constructed prior to VMVSP or if VMVSP is not approved and constructed, the infrastructure improvements associated with VMVSP would be constructed by the LRVSP. Offsite Improvements without Village of Marble Valley Specific Plan The extension of Marble



Valley Parkway, Marble Lake Road, and Lime Rock Valley Road are currently planned to be constructed as part of the proposed VMVSP, connecting the project area to the existing Marble Valley Parkway to the west. However, if VMVSP does not proceed, the applicant will be responsible to construct the primary roadway through the VMVSP project area as part of the offsite improvements needed for the LRVSP project. This roadway alignment would include the water line to serve the LRVSP from its connection point to the EID water transmission line at Marble Valley Parkway. Improvements to the US 50/Bass Lake Road interchange are planned to be constructed as the proposed VMVSP builds out to accommodate residential traffic. However, if VMVSP does not proceed, the applicant will be responsible for those interchange improvements.”

Please keep the requirements of the current General Plan we have in place. It allows for subsequent developments to be built in the character and current zoning requirements similar to existing housing developments and districts in El Dorado County. Please don't allow developments that would spoil the beauty of our oak woodlands, interfere with the aesthetics of our rural and suburban neighborhoods, create more strain on our resources, infrastructures and services, create traffic nightmares, and bring with it more crime. Additionally, please reject this Lime Rock Valley Specific Plan based on this Draft Environmental Impact Report's lack of important information, analysis and studies. A DEIR for LRVSP needs to include more information, studies and analysis as a stand-alone project.

Sincerely,

Karen Moonitz (CECSD General Manager, Retired)  
Kenneth Moonitz