



EL DORADO COUNTY PLANNING & BUILDING DEPARTMENT

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Date: October 8, 2025

To: Honorable County of El Dorado Agricultural Commissioners

From: Karen L. Garner, Director Planning and Building Department

Subject: Reconsideration of the Lime Rock Valley Specific Plan and Applicable General Plan Policies

On August 14, 2024, the El Dorado County Agricultural Commission reviewed the Lime Rock Valley Specific Plan and Marble Valley Specific Plan projects and the County's Grazing Lands General Plan Policy.

The Lime Rock Valley Specific Plan and Marble Valley Specific Plan projects are anticipated to be scheduled for Planning Commission consideration at the beginning of the year. The Planning Commission's recommendations will then be forwarded to the Board of Supervisors.

At the August 14, 2024, meeting, the Agricultural Commission raised questions regarding the capacity for the Lime Rock Valley Specific Plan property to sustain commercial livestock production and grazing for an approximately 284-acre portion of the largest subject parcel, APN 109-020-001, which measures approximately 391.47 acres inclusive of the 284-acre portion considered by the Agricultural Commission. In response to the issues raised, the applicant has submitted additional information (Attachment 1). Planning staff has reviewed the information and requested to return to the Agricultural Commission to share this additional information.

The attached memo and report include an introduction and summary prepared by Dave Romano, Civil Engineer with Newman-Romano and Bre Moebius, Partner, Hefner Law (pages 1-16) and a Grazing Viability Assessment prepared by Koopmann Rangeland Consulting March 10, 2025 (pages 18-36). The memo and report analyze General Plan policies and specifically Agricultural and Forestry Element policies that are applicable to parcels within the Lime Rock Valley Specific Plan. It also includes the County's *Procedure*

for Evaluating the Suitability of Land for Agriculture (pages 37-42), the California Department of Conservation *Agricultural Land Evaluation and Site Assessment Model* (“LESA”) (pages 43-80), and the USDA Custom Soil Resource Report for the Lime Rock Valley Specific Plan (pages 81-99). The memorandum calculates the objective scores under the County’s *Procedure for Evaluating the Suitability of Land for Agriculture* (page 6-9) and calculates the objective LESA scores (pages 11-15).

Planning staff have reviewed the report and believe it considers all applicable policies, and that the analysis provided is accurate. A point for the Agricultural Commission to consider are the map(s) that were the basis for some of the Agricultural Commission’s discussion. In the Commission’s deliberations on August 14th, the Commission referred to the Farmland Mapping and Monitoring Program (“FMMP”) from the California Department of Conservation. The County’s General Plan policies do not reference the FMMP or use it as a basis for any of its policies. Instead, Policy 8.1.1.4 provides procedures for evaluating the suitability of land for agriculture and notes that the procedures shall be used for evaluating the suitability of agricultural lands in Agricultural Districts and Williamson Act Contract lands. The attached report applies the methodology outlined and discusses the results indicating that the land does not have good agricultural capability. Although the Agricultural Commission may consider any information, resources or testimony, it’s important to note that County’s General Plan provides specific policies for the purpose of evaluating the suitability of agricultural lands.

When reviewing a project, there are many general plan policies that apply and are analyzed by staff and subsequently considered by the Planning Commission and Board of Supervisors. Even when considering a specific topic within a project, such as grazing lands, there are often multiple policies that apply. Unless explicitly stated otherwise, General Plan policies pertinent to the project should be weighed and considered in totality. In other words, a single policy should not be the only policy considered or given greater weight if other policies are applicable.

Some of the policies previously considered by the Commission and further analyzed in the attached memo and report identify the role of the Agricultural Commission in the application of some the policies. In particular, Policy 8.1.2.2 directs input from the Agricultural Commission to the Board of Supervisors and/or Planning Commission in considering the suitability of land for commercial grazing of livestock and, when determined to be suitable, protection of those lands through 40-acre minimum lot sizes.

Although the Board of Supervisors and Planning Commission will consider all applicable policies, Policy 8.1.2.2 was a particular point of discussion at the August 14th Commission

meeting as it specifically seeks input from the Agricultural Commission. That policy and an analysis of its applicability to the Lime Rock Valley Specific Plan is discussed in detail in the attached memo and report.

Planning staff is requesting that the Agricultural Commission review the new information and reconsider the input provided under Policy 8.1.2.2 for the Lime Rock Valley Specific Plan property. At the August 14th meeting, the Agricultural Commission determined that the Marble Valley Specific Plan project was not subject to these same policies and therefore, no input was necessary. The Agricultural Commission's input under Policy 8.1.2.2 will be included in the information provided to the Planning Commission along with the applicant's memo and report.