

November 10, 2025

El Dorado County Planning Commission
2850 Fairlane Ct
Placerville, CA 95667

RE: 11/12 Item 3 (for CUP23-0007/Durock Road AM/PM)

Dear Commissioners,

Thank you for the opportunity to provide comments on this proposed project. I previously submitted comments on the Mitigated Negative Declaration (MND) for this project, which I have included below. I stand by these comments.

In addition, after reviewing the additional materials submitted by the applicant I have the following comments.

The Findings for a CUP Cannot be Made

As you know, this is a quasi-judicial decision. The Commission must make its decision by examining the project and comparing it to the relevant laws, plans, policies, and ordinances to determine if the project would comply with those measures. The applicant has the burden of demonstrating that the required findings can be made.

The required findings for a Conditional Use Permit (CUP) are as follows:

- The issuance of the permit is consistent with the General Plan.
- The proposed use is specifically permitted by Conditional Use Permit.
- The proposed use would not be detrimental to the public health, safety and welfare, or injurious to the neighborhood.

All three findings must be made for the Commission to approve the project.

As described below, the project would be detrimental to the safety and welfare or the community and injurious to the neighborhood. The project also would run afoul of at least one General Plan policy.

Traffic Stacking onto Highway 50 is a Serious Threat to the Safety and Welfare of the Neighborhood, and this Project would Exacerbate the Problem

You have received numerous public comments highlighting the existing traffic concerns around the US 50/Ponderosa interchange, especially during school drop off and pick up hours. This traffic congestion isn't merely inconvenient; it poses a significant risk to public safety. As the applicant now concedes, traffic regularly backs up onto the US 50 mainline during these hours due to inadequate queuing space. Drivers proceed along the freeway at regular freeway speeds, and then suddenly and unexpectedly encounter stopped traffic in the right lane. Within the period of the circulation of the MND, there was a collision due to this backup. Adding to the serious safety situation is that many of the drivers that must navigate the area during these times are inexperienced drivers under 18 years of age heading to and from Ponderosa High School.

In their new filing (Legistar Attachment I), the applicant concedes the problem by citing the Traffic Report for the County's Capital Improvement Plan (CIP):

The Transportation Analysis Report ("Traffic Report") for the CIP, prepared in November 2024, examined five of the same intersections that the Project's TIS analyzed. The Traffic Report evaluated intersection conditions and average maximum queue lengths under existing conditions and projected "Horizon Year" 2049 conditions with and without the CIP. **The Report found that under the existing conditions, on southbound Ponderosa Road and westbound N. Shingle Road, and eastbound left turn on S. Shingle Road/Mother Lode/US-50 operate at LOS F during the peak hours of 7:45 to 8:45 AM and 3:00 to 4:00 PM (Attachment 4- Section 3.2 Intersection Operations from Traffic Report).** This is consistent with the public comments indicating that school traffic is the cause of the existing congestion. **With respect to queue length, the available storage is exceeded at the northbound Ponderosa Rd./US-50 Westbound ramps and the eastbound S. Shingle Road/Mother Lode/US-50 in the AM peak hour** (Attachment 5- Table 16 from Traffic Report). The Report also analyzed freeway operations and determined that peak hours for eastbound US-50 are 7:45 to 8:45 AM and 4:15 to 5:15 PM, and for westbound US-50, 7:15 to 8:15 AM to 3:00 to 4:00 PM (Attachment 6- Tables 17 & 18 from Traffic Report). The Report confirmed that, without the Interchange CIP, by 2049, most of the study intersections will experience a deterioration in LOS to LOS F.

With the existence of the hazard conceded, the applicant argues that their project should nevertheless be allowed to proceed because 1) They are not worsening the problem because most of their trips are pass-through trips and 2) The County intends to fix the interchange at a point in the future.

As I discussed further in my comments on the MND, the applicant's traffic study assumes that most of their clientele will be local community members who would be utilizing the roadway anyway (i.e. pass through trips). The traffic study provides no basis for this assumption. It is implausible that a fuel station located directly adjacent to a major highway, especially a highway heavily used by tourists, would not divert traffic off the main line of the highway and to their establishment. As shown by the applicant's evidence (Page 14, attachment I), local residents have several existing nearby fueling options. **The bottom line is that the project will increase the number of cars that exit Highway 50 at the Ponderosa Rd interchange, thus worsening the safety hazard. It would be detrimental to the safety and welfare of the neighborhood.**

Regarding the applicant's second argument, it is true that the upcoming interchange project will eventually mitigate some of the project's impacts. However, the full completion of the interchange project is still years if not decades away. The applicant is proposing to build now, before the improvements are in place.

Our General Plan land use element makes clear that when infrastructure is lacking, as is clearly the case at the Ponderosa interchange, an otherwise acceptable project may need to be delayed until the project can proceed without creating or exacerbating a hazardous situation:

Development within Community Regions, as with development elsewhere in the County, may proceed only in accordance with all applicable General Plan Policies, including those regarding infrastructure availability as set forth in the Transportation and Circulation and the Public Services and Utilities Elements. Accordingly, **development in Community Regions and**

elsewhere will be limited in some cases until such time as adequate roadways, utilities, and other public service infrastructure become available and wildfire hazards are mitigated as required by an approved Fire Safe Plan. (General Plan Policy 2.1.1.7)

Once the Ponderosa Rd interchange improvements are complete, it would be reasonable for the applicant to reapply. However until that project is built, any new project intended to attract drivers from Highway 50 is injurious to the safety and welfare of the neighborhood.

Other CEQA Concerns

As outlined in my comments on the MND below, in addition to Traffic/Transportation the MND is also deficient in its analysis in the areas of Aesthetics, Hydrology and Water Quality, and Public Services.

The applicant recently submitted Attachment J ("Renderings"). There is no explanation provided for the attachment, but it appears to show renderings of the Project site and surrounding area. The exhibits appear designed to enhance the aesthetics of the project by placing it within a lush green landscape that is more typical of New England or Ireland than the Sierra Nevada foothills. Unless the applicant intends to aggressively water the landscape (which would present other CEQA concerns), it will not look like the depiction for most of the year. Nevertheless when narrowing the focus to the Project buildings and features themselves, the renderings confirm the concerns I raised in my MND comments that the Project would dominate the viewshed and have a significant impact on the aesthetics of the community.

The comments related to Hydrology and Water Quality and Public Services have not been addressed to date.

Conclusion

Due to this project's worsening of an existing hazard (traffic backup onto mainline highway 50) the Project would be detrimental to the public health, safety and welfare, and injurious to the neighborhood. Thus the findings for a Conditional Use Permit cannot be made, and the application should be denied or at least deferred until improvements at the Ponderosa interchange are completed.

Should the Commission nevertheless be inclined to approve the Project, the MND is deficient in several resource areas. These deficiencies must be corrected before the Commission can consider any approval.

Sincerely,

Andy Nevis

Attachment – MND Comments

Ms. Anna Quan
El Dorado County Building and Planning Department
2850 Fairlane Ct
Placerville, CA 95667

Dear Ms. Quan,

I had a chance to review the proposed Mitigated Negative Declaration (MND) for CUP23-0007/Durock Road AM/PM. I find the MND to be deficient in the following resource areas:

Aesthetics

The project would be at the gateway to Shingle Springs. Currently, a driver driving south on South Shingle Rd from highway 50 is greeted by a beautiful stand of trees that dominates the viewshed once one passes the Durock Rd intersection. These trees reflect the rural character of Shingle Springs.

Upon construction, that viewshed would be significantly changed and would be dominated by this gas station facility. This would be a significant impact. It does not appear that the applicant has made a significant effort to modify the design to reflect the historic character of Shingle Springs – it appears to be a generic gas station facility. It is true that this facility would be built on a commercially zoned site, and this type of facility is allowed in that zoning. However, from a CEQA perspective this does not relieve the County and the applicant of the need to properly analyze the change in visual resources and mitigate where possible.

One potential mitigation would be for the applicant to conform to the Shingle Springs Community Commercial and Multifamily Design Standards that are likely to be adopted later this year. While I understand that the applicant cannot be bound by these standards as they were not in effect at the time of application submittal, designing the project to adhere to those standards could nevertheless address CEQA concerns regarding the aesthetic impacts of the project on the Shingle Springs community. In the alternative, an Environmental Impact Report must be prepared.

Hydrology and Water Quality

The project would be built on top of a bluff, adjacent to a slope that has several residential properties at a lower elevation. By creating additional impervious surface, this project could increase runoff. There is a history of flooding concerns in this area. At a March 19, 2025 public meeting on the Ponderosa Interchange Project, residents of the neighborhood that would be directly below this project site raised concerns about that project's potential contribution to stormwater runoff. They noted that they currently experience runoff from the interchange area. The interchange area and the proposed project that is the subject of this MND overlap.

The specific hydrological conditions at the site are not addressed in the MND – the MND goes as far as to claim “no impact” from flooding, noting that the project is not within a 100-year flood plain. From a CEQA perspective, simply not being in a 100-year floodplain does not mean that there will be no flood related impacts from the project, especially as climate change makes heavier rainfall more common compared to historical reoccurrence rates. There must be a site-specific analysis of runoff and flood risk before this Project is considered.

Public Services

The project claims not to have any impact on schools. It appears that this claim is based on a narrow view of impact determinate on whether the project would introduce any new school age children into the community (obviously it would not). However, there could be significant indirect impacts on school facilities.

The Ponderosa Rd/US 50 interchange is the primary route of travel to nearby Ponderosa High School, as well as Providence Christian School.

As discussed further below, traffic is a significant concern at this intersection and the Project's traffic study is based on questionable assumptions. This project could significantly increase existing traffic congestion and the ability of students to get to in from school in a timely manner. It could also impact bus routes of the El Dorado Union High School District and Buckeye Elementary School District.

Similarly, the El Dorado County Fire Protection District has a fire station along Ponderosa Rd. The resources at that station rely on quick access to and from US 50 to respond to emergencies. The MND did not consider impacts of the Project on their response times.

Transportation/Traffic

A traffic study is included with this MND submittal. The traffic study claims that the Project will not cause any level of service issues. However, there appear to be several flaws and omissions:

- The project trip distribution, which is one of the most critical parts of traffic analysis and influences all other findings, assumes that only 20% of trips will involve US 50. This claim is highly suspect. The fuel station is presumably being proposed near the freeway to attract travelers on US 50. By assuming a low percentage of trips from US 50, the traffic study shows a lower traffic impact on the interchange and overpass, as well as a lower impact to offramp queue length, than would be observed if the US 50 trip distribution were greater.
- The traffic study does not adequately analyze impacts on school arrival and departure traffic. The study examines AM Peak Hour and PM Peak Hour traffic, defined as the highest one hour of traffic flow between 7:00 AM and 9:00 AM and 4:00 PM and 6:00 PM respectively on a typical weekday. School release traffic (approximately 2:30 PM) is missed entirely by these windows. While school arrival traffic (approximately 8:30 am) may be captured within the AM Peak Hour window, the one-hour average dilutes the impact of school traffic because school drop off traffic tends to be concentrated within a 15-to-30-minute window just before school starts. Thus, while intersections may operate at acceptable levels when traffic is averaged over an hour period, they may have dangerous and unacceptable conditions during the narrower drop off period.

Ponderosa High School sees a high degree of student drivers. It is critical that the traffic study consider the impact of the project on the traffic that these vulnerable and less experienced drivers must navigate. Failing to do so creates a safety hazard.

- The traffic study states that the project would not result in traffic backing up onto the US 50 mainline. The lived experience of travelers in the area contradicts this conclusion. Under

existing conditions, traffic backs up onto the US 50 mainline regularly, especially shortly before the start of school at Ponderosa High School. This situation is an existing safety hazard, which the proposed project would exacerbate.

At the bottom of this comment letter are screenshots from a Nextdoor post (personal information redacted) showing a collision that occurred on US 50 at the Ponderosa Rd Eastbound onramp shortly before the start of the school day. This occurred on a morning during the period of this MND circulation. The comments from other residents below that post confirm that this is an existing problem.

The above comments must be addressed before this project proceeds to a public hearing. Thank you for your consideration.

Sincerely,

Andy Nevis
Shingle Springs resident

Cc: Karen Garner, El Dorado County Director of Planning and Building
Robert Peters, Deputy Director, Planning
Jefferson Billingsley, Deputy County Counsel
Rafael Martinez, Director of Transportation

Nextdoor Screenshots



· 2w · Edited ·



Accident just happened at E50 at Ponderosa exit. Stopped traffic and car rear ended a stopped car. Use Meder to get to school!



Like



Comment



Share

2w · Bar J Ranch

I hope nobody has serious injuries. Unless significantly upgraded, the Bass Lake Road exit will be just as bad/worse when they build Marble Valley and the hotel. That is already a tricky spot giv... [See more](#)

♡ 4  Reply ...

  4

2w · Serrano Villages

That was bound to happen! I spent 4 years getting off that exit to take my kids to school and I've had to call CHP a few times because it's so dangerous that people are stopped on the highway. It's ridiculous actually and needs to be fixed!

♡ 1  Reply ...

 1

2w · Meder & Ponderosa

It is very dangerous. I take my kids to school this way everyday. So many accidents right near here crazy.

♡ Like  Reply ...

2w · Hillwood

Red lights at Ponderosa Road seem to mean speed up. I always wait a second when my light turns green



ARCO gas station Durock Shingle springs ca.

From Kathy Block <kathy.block@ymail.com>

Date Sun 11/9/2025 10:17 PM

To Planning Department <planning@edcgov.us>

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Sent from my iPhone

This is a terrible idea. The infrastructure needs to be upgraded to accommodate traffic at that overpass as it is. Plus that intersection currently has stations, markets and sandwich shops. It will hurt the businesses that are already there and struggling to make it.



File #25-1835 Durock Arco AMPM

From info.shinglespringscommunityalliance.com <info@shinglespringscommunityalliance.com>

Date Sun 11/9/2025 6:51 PM

To Planning Department <planning@edcgov.us>

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Dear Clerk for the Planning Commission,

Please acknowledge receipt, distribute these comments to all of the Planning Commissioners, and include in the public record.

Thank you,

Team SSCA on behalf of the
Shingle Springs Community Alliance

Keeping Shingle Springs Rural

www.ShingleSpringsCommunityAlliance.com
www.facebook.com/ShingleSpringsCommunityAlliance

What are the benefits to our community from this project? There are NONE. We already have plenty of gas stations / convenience stores / car washes at and near this location along Highway 50.

What are the benefits to the County? There are NONE. Whatever tax revenue is produced by the gas station would be offset by REDUCTIONS of tax revenues from other nearby stations whose customers would now be using this station. **THERE IS NO NET INCREASE IN TAX REVENUE.**

The traffic around the Ponderosa Road interchange is so incredibly bad that Durock and North Shingle roads are planned to be moved in an effort to alleviate traffic congestion. This is probably the most traffic congested interchange area in the County, and the overpass is slated for widening in the near future.

If the project is built now, how do cars return to the freeway?

1. Durock Road - Cars trying to return to the freeway via Durock will have to navigate backed-up traffic on Durock. Traffic currently backs up on Durock past the proposed gas station property to the rental yard, and sometimes past the rental yard, due in part to the stoplight at Durock/South Shingle. The stoplight does not allow sufficient time for vehicles to turn left. A "Keep Clear" area is proposed to be painted on the road at the Durock Road entrance to the gas station to allow cars to return to Durock

(that's how bad the traffic is there). So cars backed up on Durock are expected to allow cars leaving ARCO to cut in front of them – that will not go well.

2. South Shingle Road – Cars **must** turn RIGHT (south) on S. Shingle to exit the gas station. How do they return to the freeway? They are supposed to turn left on Sunset Lane then left onto Mother Lode – that is a poor solution. Impatient drivers may choose to pull a U-turn on S. Shingle or use the driveways of the small engine repair business instead. This will exacerbate the existing traffic congestion and makes no sense. The fuel delivery trucks are to use the Sunset Lane and Mother Lode Road to return to the freeway, but Sunset Lane is not a truck route!

Realignment of Durock Road

1. Once Durock Road is realigned, there is no longer any access to Durock Road for the proposed gas station. South Shingle Road will be widened to 4 lanes and a left turn from the gas station will be allowed. **ALL** traffic leaving the gas station must use that left turn lane and cut across 2 southbound lanes to turn left, which can be extremely dangerous!

Traffic Study

1. According to the Traffic Impact Study (September 2025), about 2,000 cars per day will enter and exit the gas station (interpreted from Table 4). All those cars will be funneled out of the station onto Durock and S. Shingle. That concentration of traffic will add to the existing congestion.

2. According to the traffic impact study, traffic counts that form the basis of the traffic modeling were collected in May 2022. That was near the end of the COVID pandemic when there were fewer cars on the road as a result of stay-at-home workers. Therefore, the traffic projections are outdated and under report the impacts. Traffic is rebounding over the past few years to pre-pandemic levels. Traffic conditions that we are living with today are worse now than they were back in 2022.

In summary, the SSCA asks that this project be considered only **after** the planned realignment of Durock and North Shingle Roads are completed. At that time, new traffic counts should be collected to document and analyze the post-realignment traffic conditions.



Arco gas station on Durock Rd. and South Shingle Rd.

From JoAnn LoFranco <jlofranco@yahoo.com>

Date Sun 11/9/2025 11:15 AM

To Planning Department <planning@edcgov.us>

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My concerns about the project include:

There are already two gas stations, three convenience stores and one car wash within a one tenth of a mile of the proposed site. There is no need of another.

This intersection is already heavily impacted, adding more traffic from a high turnover business like a gas station will significantly impact the problem.

Durock Rd. is already non-compliant due to it's proximity to the freeway offramp, which raises concerns about traffic safety and planning oversight.

Common sense and community interest suggest this is not a responsible or community minded location for such a redundant development.

[JoAnn LoFranco](#)



Arco Station project at Durock/So. Shingle

From Mama Misch <misch.mama@yahoo.com>
Date Sat 11/8/2025 5:40 PM
To Planning Department <planning@edcgov.us>

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NO!!! Please do NOT inflict this horrible project on the people of our small community!! The intersection in question is HORRIFIC already! To add all the entering and exiting issues from the gas station would only mean more possibilities of accidents, and frustrated drivers. The area is already the worst in the County - lights are not in any sort of uniformity... it's hard to make it through the intersection of Durock to So. Shingle unless you're one of the first 3 cars at the light. I know that I, for one, would avoid that area, and the businesses there, entirely!! There are MANY other places to spend my money!

D. Misch

[Sent from Yahoo Mail for iPhone](#)



Outlook

Arco on Durock and shingle springs

From Terrell <ctakbbgaches@gmail.com>

Date Sat 11/8/2025 11:04 AM

To Planning Department <planning@edcgov.us>

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I know that this development is on your agenda for the 12th. We are strictly opposed to ANOTHER gas station and market on this corner as there are already two others at the same intersection!! This is not needed!!!

Terrell Gaches



Arco gas station etc. South Shingle

From Valerie Ogden <vhcesq@123la.net>
Date Fri 11/7/2025 5:25 PM
To Planning Department <planning@edcgov.us>

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We can not support this project. The gas station is redundant, the mini-mart is redundant and this project appears to create more traffic and more pollution in what we are trying to keep as a pleasant environment. We are also concerned with the runoff, pollution and traffic congestion from an additional gas station at that particular strategic location.

Thank you for your consideration.

James and Valerie Ogden

Sent from my iPhone



ARCO

From Ken and Heidi Brown <kandhbrown@gmail.com>

Date Fri 11/7/2025 4:43 PM

To Planning Department <planning@edcgov.us>

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Dear Planning Department,

We are in opposition to the proposed AM/PM at the corner of Durock Rd. and South Shingle Rd. in Shingle Springs. That is an intersection that we travel through almost daily. Traffic congestion at that juncture at times is gridlocked. The additional presence of an AM/PM gas station will only compound an already overloaded traffic intersection. Currently there are two gas stations adjacent to that intersection, fulfilling any fueling needs. We don't view this project as adding value to the area.

Thank you for your consideration.

Ken and Heidi Brown
4735 Farms View Rd, Shingle Springs, CA 95682