P.C 08/08/24
Item # 3

FW: Public Comment for Marble Valley/Lime Rock Valley

Cameron W. Welch <Cameron.Welch@edcgov.us>
Wed 8/7/2024 7:23 AM
To:Planning Department <planning@edcgov.us>
Public comment received for 8/8 PC workshop.

Sincerely,

Cameron Welch
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A Great Place to Live, Work & Play

From: JoAnn LoFranco <jlofranco@yahoo.com>
Sent: Tuesday, August 6, 2024 7:42 PM
To: Cameron W. Welch <Cameron.Welch@edcgov.us>
Subject: Public Comment for Marble Valley/Lime Rock Valley

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Report Suspicious

I am very concerned regarding this project being increased to 800+ homes. In the event of a wildfire evacuation on our two lane roads will be close to impossible. Also our two lane roads with our current population are already severely impacted, our infrastructure just can't handle 800+ more residences. This will have a huge traffice impact as well as a reduction in quality of life for us living in this area.

JoAnn LoFranco

Village of Marble Valley Specific Plan public workshop August 8, 2024

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

El Dorado Hills Area Planning Advisory Committee <info@edhapac.org>

Tue 8/6/2024 8:19 PM

To:Planning Department <planning@edcgov.us>;Aurora M. Osbual <Aurora.Osbual@edcgov.us>;Andy Nevis <Andy.Nevis@edcgov.us>; Daniel Harkin <Daniel.Harkin@edcgov.us>;Lexi Boeger <Lexi.Boeger@edcgov.us>;Brandon Reinhardt <Brandon.Reinhardt@edcgov.us>; Bob Williams <Bob.Williams@edcgov.us>

14 attachments (18 MB)

EDH APAC Village of Marble Valley Specific Plan DEIR Public Comments.pdf; EDH WATER - Supply + Demand Analysis -W-FULL.pdf; EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf; EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf; EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf; EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf; EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf; EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf; MARBLE VALLEY LAND USE STUDY-A-Dunn2.pdf; 1 MASS GRADING MEMORANDUM 27 June, 2024.pdf; 2 MARBLE VALLEY SLOPE ANALYSIS.pdf;

Hello,

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following public comments regarding the DRAFT EIR for the Village of Marble Valley Specific Plan **SP12-0003**, in advance of your public workshop on August 8, 2024.

Comments and questions were collected from EDH APAC members, El Dorado Hills residents, and Cameron Park residents who reached out to EDH APAC regarding the project.

EDH APAC members would also like to share our concern with two large specific plan projects seemingly being processed as one project. Or belief is that these projects should be processed separately, with at least 30-60 days space between hearings. As the larger project, the Village of Marble Valley Specific Plan should be processed first, as many of the infrastructure and mitigations proposed in the VMVSP project are included as infrastructure elements and mitigation actions for the Lime Rock Valley Specific Plan. Two Specific Plan applications, two projects, two hearings.

EDH APAC is also concerned about the capacity of the Deer Creek Waste Water Treatment Plant. The DEIR points out that the current capacity of the facility and conveyances are likely adequate 'enough' to serve the project, but if the project generates additional capacity requirements beyond what is in place, the project should shoulder a significant portion of the burden of providing the additional required capacity.

We look forward to continued engagement with the project applicants, as the project moves forward.

Attachments:
EDH APAC Village of Marble Valley Specific Plan DEIR Public Comments.pdf
EDH WATER - Supply + Demand Analysis -W-FULL.pdf
EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf

EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf
EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf
EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf
EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf
EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf
EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf
EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf
EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf
MARBLE VALLEY LAND USE STUDY-A-Dunn2.pdf

Additionally, EDH APAC would like to also include the following attachments - These comments and questions were created by EDH APAC member Alastair Dunn, an El Dorado Hills resident with an extensive career in land Acquistion, development, entitlement and market analysis. Mr. Dunn has generated this analysis and shared it with EDH APAC officers. We wanted to provide this analysis and its questions, comments, and concerns as additional public comment on the DRAFT EIR for the Village of Marble Valley Specific Plan.

Attachments:
1 MASS GRADING MEMORANDUM 27 June, 2024.pdf
2 MARBLE VALLEY SLOPE ANALYSIS.pdf

We look forward to continued engagement with the project applicants, as the project moves forward.

Respectfully,
John Davey
Chair

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The County of El Dorado Planning Department
Cameron Welch Senior Planner
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Sunday June 30, 2024

RE: Village of Marble Valley Specific Plan DRAFT Environmental Impact Report Public Comments

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following comments on the Village of Marble Valley Specific Plan DEIR. Comments were collected from EDH APAC members, El Dorado Hills residents, El Dorado County residents, and residents of Cameron Park.

Where necessary, supporting exhibits are attached as PDF Documents.

General Plan Consistency

Transportation Element

Vehicle Miles Traveled is the transportation metric now considered in CEQA, but Level of Service (LOS) metrics are incorporated into the El Dorado County General Plan. EDH APAC is concerned that traffic LOS impacts have not been studied or mitigated for traffic generated by the project for high school student residents of the project that will be attending Union Mine High School located at 6530 Koki Ln, El Dorado, CA 95623.

Students will potentially have to travel by US 50 through some of the following US50 intersections: Bass Lake Road, Cambridge Road, Cameron Park Drive, Ponderosa Road/South Shingle Rd, Shingle Springs Drive, Red Hawk Parkway, Green Stone Road, El Dorado Road, and Missouri Flat Road. The DEIR does not study these US50 segments for LOS impact for commutes to and from Union Mine High School.

Travel to and from Union Mine High School via the El Dorado County surface road network would

include many road segments - Bass Lake Road, Country Club Drive, Cambridge Road, Flying C Road, Lariat Road, Strolling Hills Road, Cameron Park Drive, Coach Lane, Durock Road, South Shingle Road, Sunset Lane, Mother Lode Drive, and Pleasant Valley Road. The DEIR does not study these road segments for LOS impact for commutes to and from Union Mine High School.

Q: LOS impacts of the project extend beyond the El Dorado Hills and Cameron Park communities, and over 20 miles of El Dorado County Roadways and the California Highway system, and require study and mitigation. Will LOS studies be completed to account for possible General Plan Transportation Elements Impacts from trips to Union Mine High School?

Housing Element

Affordable Housing page 3.6-29

Under Key Project Attribute

Priority Area Key Project Attribute Project Consistency Analysis (prior to mitigation)

At least 20% of units included are affordable to lower-income residents Not Consistent.

The VMVSP does not include any affordable units.

Results in no-net loss of existing affordable units Consistent. The VMVSP will develop underutilized open space and does not result in a net loss of existing affordable units.

Of course there is no-net loss of existing affordable units, there were never any built. This is undeveloped land.

Q: Why is the developer exempt from providing lower income housing in this 3,000+ development ?

Traffic - Transportation

The EDH APAC Standing Transportation Committee offered the following comments.

EDHAPAC Standing Committee on Transportation

Marble Valley Transportation Response

6/29/24

Summary Assessment:

The report describes surrounding infrastructure as it relates to this project but is vague or only touches on amenities in the project. It only addresses traffic generically and defaults to the basic acceptable guidelines from CEQA and OPR. The lack of specific detail implies that this is a precursor to a detailed report, and it is the expectation of the EDHAPAC Standing Committee on Transportation that the developer will complete the detailed traffic impact study.

The committee also has questions on emergency evacuation, bike and pedestrian paths, and US 50 interchange,

Specific Issues:

Q: Lack of comprehensive traffic study - Unless there is a more comprehensive traffic report coming, their numbers VMT, etc come from the county and might not be accurate with respect to this project. This Transportation and Circulation report lacks much-needed detail for this project. The expectation is that the majority of grocery, retail/fast food/restaurants, fuel stations will be on the Bass Lake RD north side of the freeway and will increase VMT out of and into the project.

Q: Lack of clarity on emergency evacuation plan - Will there be egress paths on the southern end of the project? Currently it looks like the main exit is Marble Valley Parkway to Bass Lake Road. The FD appears to have multiple access points. Will the public be able to use the FD access roads to evacuate? With over 3,000 homes and businesses in a tight valley, lack of egress is a recipe for disaster and loss of life.

Q: Lack of clarity on bike and pedestrian paths - The committee continues to focus on bike and pedestrian paths that are available to everyone. The report emphasizes and envisions various pedestrian and bicycle pathways used to get to neighboring areas, parks, and retail.

The proposed class1 bike lanes are restricted to public roads which prevent the general public from utilizing the lower portions of both sites.

Gravel roads are not suited for road bikes and are not open to the public in these plans. These trails end at Deer Creek bridge.

The vision of many is for a bike /pedestrian trail system that traversed the entire proposed development. The jewel in the crown would be a connected bike/pedestrian/equestrian pathway that utilizes the old train line. Examples of this type of path can be found in Placerville and in much of the nation where old train lines are converted to serve the community.

Who will be responsible for maintaining the bike and pathways within the project and connected outside the project?

Q: Main access-Bass Lake Exit off of US50 - This is controlled by Caltrans and not the County DOT. What is the plan and timeline to improve this on/off ramp and access to the Bass Lake retail area north

of 50? This could also apply to Cambridge Rd which looks like it will require a connector road to be built from Marble Valley Parkway to Cambridge. Who coordinates and pays for that?

Interim Interchange improvements - The DEIR indicates that “interim” improvements will be made to the Bass Lake Road - US50 interchange when the project hits a trigger of 800 building permits. What is the methodology that prescribes 800 building permits as the appropriate trigger to offset impacts to the Bass Lake Road - US50 interchange? What improvements are proposed? The costs to study, design, and improve a California Highway interchange are significant, and costly, and take years to achieve and then construct.

The DEIR indicates that “interim” improvements will be made to the Cambridge Road - US50 interchange when the project hits a trigger of 750 building permits. What is the methodology that prescribes 750 building permits as the appropriate trigger to offset impacts to the Cambridge Road - US50 interchange? What improvements are proposed? As with the Bass Lake Road interchange, the costs to study, design, and improve a California Highway interchange are significant, and costly, and take years to achieve and then construct.

“Interim” interchange improvements suggest a temporary, or short term solution. What are the permanent and long range solutions to the Bass Lake Road and Cambridge Road interchanges that purport to fully mitigate the project’s impacts? What is the timeline for these improvements?

Resident comments regarding transportation submitted to EDH APAC

Q: Bass Lake/US 50 interchange: The Bass Lake interchange will have to be totally redesigned and reconstructed in order to accommodate any additional population increase on the Bass Lake corridor. Traffic already backs up on the E/B off ramp in the afternoons. Traffic backs up onto the freeway causing delays to the current residents and an unsafe condition ripe for a collision on the freeway. No additional traffic should be added to this interchange without a plan and funding in place to be completed before any new residents move to the area. Since the interchange improvements will have to be a partnership with the state and county, this is likely a 10-20 year project before completion.

Q: Bass Lake Road: This road is already inferior and unsafe in a few locations between US50 and Silver Springs Pkwy. This is a small two lane county road that was not designed for the current traffic volume. The additional residents of Marble Valley/Lime Rock will only exacerbate the unsafe condition. There are no turn lanes, suicide lanes or turn outs on most busy intersections. Intersections, such as Hollow Oak/Bass Lake should already be signalized and is currently an unsafe intersection. No additional population should be planned without improving the roadway in advance.

Q: The fire access roads planned in Marble Valley/Lime Rock are restricted use roadways that will not be open to the public on a normal basis. The roads will be gated because the surrounding, existing neighborhoods, do not want additional traffic caused by these developments to impact their neighborhoods. There is no plan in place to open the gates during an emergency. If there is a wildfire and Marble Valley/Lime Rock residents need to evacuate the area they will have to wait for the gates to be opened before they can evacuate. This is a horrible plan with a single point of failure to think that

someone (Fire Dept, Sheriff?) will have to respond to the gate and open it. If there is a fast moving wildfire, similar to Paradise or Oakland Hills, it will be too late and the evacuation roads will be irrelevant because people will not be able to get out.

Environmental Comments

The Environmental report is a long and extremely detailed report explaining the challenges with this project and maintaining the current ecological environment with respect to fauna, special species, oak woodlands, riparian woodlands, wetlands, and grasslands.

There are too many variables in this report to address all the individual concerns. Therefore, with an overall view of this report here are the key questions.

Prior to grading and construction, a hired biologist is the most essential monitor for the safe and ecological development of this site with regards to preserving and protection plants, animals, and ecosystems during the first few years of construction phase. See page 3.3-40

The first years because it the responsibility of the biological monitor to ensure that any species of bird, rare plants, or special species are protected during their mating season and raising their young-such as discovering grounds nests in area about to be graded, which would result in fencing going around the nest till young have left. After that all will be graded and destroyed so future nesting in that area will not occur. Will this actually happen when the biological monitor is not there on a daily basis? This is a very large project for one to monitor.

As listed multiple times in this document for the various environments, special species, rare plants, etc. It is the responsibility of the biological monitor hired by the project manager to:

1. Mitigation Measure BIO-1b: Conduct environmental awareness training for construction employees page 3.3-39. This is to be done by the bio monitor but the environmental awareness program will be provided to all construction personnel to brief them on the life history of special-status species in or adjacent to the project area, the need to avoid impacts on sensitive biological resources, any terms and conditions required by state and federal agencies, and the penalties for not complying with biological mitigation requirements. If new construction personnel are added to the project, the contractor's superintendent will ensure that the personnel receive the mandatory training before starting work. An environmental awareness handout that describes and illustrates sensitive resources to be avoided during project construction and identifies all relevant permit conditions will be provided to each person.

Q: How is this verified that it is done?

Q: Does the inservice have to be done in a language that the construction workers understand?

2. Mitigation Measure BIO-1c: Conduct periodic site visits during construction 3.3.-40

3. Mitigation Measure BIO-1d: Avoid and minimize potential disturbance of oak woodland habitat and compensate for loss of oak woodland and individual trees

4. Mitigation Measure BIO-1a: Install construction barriers around the construction area to protect sensitive biological resources to be avoided

Mitigation Measure BIO-1c: Conduct periodic site visits during construction The project applicant will employ a qualified biologist to conduct periodic site visits during construction as necessary in and adjacent to all sensitive biological resources in the construction area. The frequency of site visits will range from weekly to monthly, depending on the biological resource, and may be done concurrently with other monitoring that may be occurring onsite (e.g., California red-legged frog, SWPPP compliance). The biological monitor will assist the construction crew as needed to comply with all project implementation restrictions and guidelines. The biological monitor also will be responsible for ensuring that the contractor maintains the staked and flagged perimeters of the construction area and staging areas adjacent to sensitive biological resources and will inspect the barriers to ensure that the barriers are intact. The monitor will assess any adverse effects on sensitive biological resources resulting from violations of the barrier mitigation requirements and, if resources are adversely affected, will notify the County and the regulatory agency with jurisdiction over the affected sensitive resource. Work will stop until the barriers are reestablished. The monitor will provide the County with a monitoring log for each site visit, which will be provided to interested agencies upon request.

Mitigation Measure BIO-1d: Avoid and minimize potential disturbance of oak woodland habitat and compensate for loss of oak woodland and individual trees Demonstration of compliance with the ORMP and tree preservation and replacement plan and measures below will be required in all grading and improvement plans for the project. Compliance with these construction measures will be monitored by a qualified biologist and reported as indicated in Mitigation Measure BIO-1c. The potential for long-term loss of woody vegetation will be minimized by pruning vegetation rather than removing entire trees or shrubs in areas where complete removal is not required. Any trees or shrubs that need to be trimmed will be cut at least 1 foot above ground level to leave the root systems intact and allow for more rapid regeneration. Cutting will be limited to the minimum area necessary within the construction zone. To protect nesting birds, no pruning or removal of woody vegetation will be performed between February 1 and August 31 without preconstruction bird surveys conducted in accordance with CDFW and/or USFWS requirements.

These steps not only apply to the environment but to special species identified in the project area, which include: red leg frogs, yellow leg frogs, Northwestern Pond Turtles, horned lizards, birds, bats, monarch butterflies, American badgers, and ring tails.

This is just a brief description of the biological monitors' responsibilities. That individual or firm has a tremendous amount of responsibility and power. They can shut down the project if certain environmental requirements are not met or hidden.

Q: Is there a conflict of interest between the monitor and the project manager?

Page 3.3-40 “The monitor will provide the County with a monitoring log for each site visit, which will be provided to interested agencies upon request.” This monitoring log should be available to the public, especially the environmental subcommittee of EDHAPAC.

Q: What does the county do to ensure the outlined procedures in this document are followed? What is the documented Monitoring Process?

Here is the language for mitigation on removal and replacement of live oaks and heritage oaks

Permanent Impacts Using the criteria in the ORMP, the overall project area has a total of 1,887.9 acres of oak woodland, 689.6 acres (36.5%) of which are within the impact area of the project footprint. A total of 9,244 inches of individual native oak trees and a total of 5,692.5 inches of Heritage Trees not growing in oak woodland habitat would also be affected by the project. Under the ORMP, the project would be required to mitigate all oak woodland impacts at a 1:1 ratio where 50% or less of onsite oak woodlands are affected. Mitigation for oak woodlands can be accomplished using one or more of the following options.

1. Offsite deed restriction or conservation easement acquisition and/or acquisition in fee title by a land conservation organization for purposes of offsite oak woodland conservation

2. In-lieu fee payment

3. Replacement planting onsite within an area subject to deed restriction or conservation easement

4. Replacement planting offsite within an area subject to a conservation easement

5. A combination of options 1 through 4, above. Mitigation for removal of individual native oak trees is based on an inch-for-inch replacement standard. Mitigation for Heritage Trees is based on a replacement standard of 3:1 (inches) ratio. Impact mitigation requirements for individual native oak trees and Heritage Tree include several options.

Q: Which option(s) does the developer intend to honor?

Recommend that at some future meeting before grading starts, that the bio monitor or firm gives a presentation on how they hope to comply with this complicated project and then take questions from the public.

Biological Resources

1. As on previous projects, the project proponent takes the cheap way that does not satisfy CEQA. Why do they think using data from 2012 is appropriate? The drought, global warming, excessive

winter rains have greatly changed the environmental setting. The flora and fauna have changed in the last twelve years. There is an attempt to look current with the 12-page table (Table 3.3-3) by showing the old data, then adding in information on sightings of different species from a 2024 list added to the table. This is simply not enough to make any determination of what is present in the project area now.

Q: Biologists need to do thorough new fieldwork and studies, identify plants and animal life that are present or could be there, and identify project impacts based on current information, not 2012 studies. Then you can develop meaningful mitigation measures based on what is present—not what used to be there 12 years ago.

2. Several Biological Reports date to 2012 Perhaps citizens should also point out some of the problems with your reports to the Corps so they are aware of this attempt at "sneaking" this through process in their permit review without doing current surveys?

Q: Will the Corps of Engineers accept old or expired reports?

3. Does Parker Development ever use a different team for the biological work? As a check of the system, a new firm should be used, not someone who has much to gain by saying "all good" on their previous studies, and apparently not advocating for new studies.

Q: As a check of the system, a new firm should be used for updated biological reports.

Archeological/Cultural Resources

1. As with the biological studies, the DEIR uses expired reports based on 2012 studies. Are any of the sites still there? What has been damaged in the interim? A 2023 or 2024 report reporting on the condition of the resources is required. Also, the way sites are treated now is changing—districts create great difficulties in determining significance and in creating mitigation measures.

Q: A 2023 or 2024 report reporting on the condition of the resources is required.

2. Native American consultation dates to 2013 - 11 years ago. Much has changed since that time. There are many more groups on the Native American Heritage Commission list for El Dorado County. There is also a group, not federally recognized yet, but reported to have descendants of the nearby tribelet of *Wapumne* near Latrobe. This group believes in the importance of bedrock mortar sites. Their opinion should also matter, as well as the current views by other groups, and new mitigation measures developed.

Q: Native American Heritage Commission list for El Dorado County should be consulted for updated 2024 consultations and new mitigation measures developed.

3. The burial site capped by Archeo-Tec needs to have the original boundaries determined. You are relying on very early studies before GPS, and all that anyone has mapped is an approximate

location of site boundaries under the layer of dirt. Any development feature planned in the vicinity of the site could cut into the site, and further damage the site.

Q: The burial site capped by Archeo-Tec needs to have the original boundaries determined.

4. How about using a truly impartial archeological firm to do some current work with an up-to-date survey and mitigation measures for the current project design? The team used in the past will simply defend their old studies. They should be advocating for an update, knowing their report is expired.The Corps of Engineers is unlikely to accept this expired study, and should also request a newer report.

Q: Impartial archeological firm should be engaged to do some current work with an up-to-date survey and mitigation measures for the current project design. The Corps of Engineers is unlikely to accept this expired study, and should also request a newer report.

Public / Community Benefits

1. What value does this project have for existing residents of El Dorado Hills and Cameron Park? How will this enhance the lives of current residents? Does it mean more than the traffic impacts it will cause at an already backed up intersection of the Bass Lake Road exit and Highway 50.
2. Why is an archeologist doing the DEIR documents? No generalists available? Or perhaps someone else might call out the problems with using out of date environmental technical studies that environmental authors seem to think are adequate?
3. Trying to turn this area into the “Butchart Gardens South” will not work. The only similarity is that someone started with an old limestone quarry. The photograph of the gardens shows many types of plants that will not survive in this hot environment. Gardens thrive at Butchart because of their location in a cooler climate on the ocean. Will you employ the same number of gardeners that Butchart has? Will the HOA pay for all upkeep? Their job will be to remove dead plants not suitable for this gardening zone. This is a pipe dream—it won’t happen here.
4. With the wine tasting facility planned for the Town and Country project across the Highway, why would you be proposing one here? The whole proposal for Marble Valley is like trying to find some feature that will appeal to every person—a garden—check, we have that; open space—check again; walking trails—check; and so on. And again, the question remains, what does this loss of open space do for the average resident?

Water Supply

EDH APAC member Alastair Dunn, with years of experience in land development, acquisition, and entitlements, not just in El Dorado Hills and El Dorado County, but nationally, has expressed major concern regarding water supply in El Dorado Hills, as well as with the calculation methodology and value of older reporting data. Mr. Dunn has provided the following detailed analysis to EDH APAC for inclusion in response to the DEIR for the Village of Marble Valley Specific Plan.

EDH APAC EXECUTIVE SYNOPSIS

Water Supply - General Plan Consistency

The data suggests that on a local - EDH -level the supply and demand situation appears in a deficit of supply, not only in the short run, but also in the medium and long term.

Summary:

Given the positive assertion that: “there is sufficient water to cover the needs of all EDH projects” in general and Marble Valley and Lime Rock Valley Specific Plans, in particular; is false.
The main issue of imbalance in the medium and long term is the certainty of water rights secured and capital improvements achieved, see Exhibit 8 & 9. It is beyond my ability and the scope of this work to make any qualifying remark other than to say; I am uncomfortable with the caveats made in memoranda qualifying EID’s water availability. To quote one such caveat*: “The water rights applications and environmental analysis are still pending”. And “the District cannot predict whether or when El Dorado Water Reliability Project may be approved”. Indeed, the Tully and Young Memo of May 30, 2014, is rife with caveats that are now eleven ten years old.

Admittedly EID has achieved much since 2013, however, to continue to write long memos and outdated references in the Marble Valley DEIR underscoring the water rights secured and capital improvements made, it is imperative that a fresh review of these critical issues are factually reviewed, and if possible, qualified by a concrete probability (0 to 100) to give a measure of credibility as to water supply.
(*MSR & SOI Update (final) Public -Service & Infrastructure, page 7-16 in reference to 2010 EDWPA’s environmental report).

CONCLUSION

The fact that 17000 units are planned in the EDH area should give anyone reason to question the availability of water for such a fantastic, planned demand.

Throughout the DEIRs from 2013 to 2024 there are statements concluding that there “is” sufficient water to attend Marble Valley’s (and Lime Rock’s) potable water needs. I suggest that this is not true for the EDH area.

Regarding Appendix B - Consistency with the El Dorado County General Plan in objective 5.2.1.2 and 5.2.1.4: The attached memorandum forwarded by this EDH APAC Member suggests that:
Q: The Project Consistency statement made that there “is” sufficiency of water is not true.

Q: The County must insist that the proponent, Marble Valley LLC have a full and proper update of the SB 610 Water Supply Assessment of August 2013 by Tully & Young updated prior to proceeding with any hearing by the Planning Commission for such a project.

EID & EDH: Water Supply & Demand Study by Alastair Dunn

The following documents were reviewed:

➢ DEIR, Water Supply Assessment, Tully & Young, October (2021)

➢ Village of Marble Valley Specific Plan, DEIR, May, 2024: Other Considerations, Impact Analysis.

➢ BAE Memorandum, November 2023

➢ EID's Urban Water Master Plan 2020, Chapters: 2 Water Service and System Description, 3 Water Supply, 4 Water Use, 5 Water System Reliability.

➢ Tully & Young Memorandum, May 2014 (19-1670 G 216 of 360)

➢ El Dorado Water Supply Assessment for Central El Dorado Specific Plan, August 2013.

The Marble Valley DEIR document constantly refers to past EID studies now between 11 and 5 years old, which to my mind brings into question the validity of the statements made in the DEIR itself.

On the 11th of June last in the Planning Department's presentation in Cameron Park of Marble Valley and Lime Rock Valley, the proponents' leaflets on Water Supply said: "Based on these estimates from the EID's Urban Water Management Plan (UWMP-2020) there would be sufficient water supply for the proposed project, as well as other planned developments". It is that assertion I wish to qualify in this document.

Methodology

I attempted to reconstruct the many tables presented by EID throughout the documents into Excel tables to clearly show both historical (2015-2020) and projected (2020-2040) data so that one may quantify the basis of the assertions made as to adequacy of water availability for future projects in EDH.

All data was taken from the referenced documents above. However, it was incredibly difficult to link the many tables referenced into a logical array. Accordingly, I had to make some assumptions to present an array of data from 2015 to 2040 in a logical manner.

Particular attention was given to EDH's "pipeline*" of active and future projects undergoing the CEQA process in the County Planning website (projects in your area) to construct a nexus between residential units and acre feet of water to be supplied. See Exhibit A. (*Land developers generally refer to projects

in the pipeline, to identify for planning purposes the number of residential units and commercial development for a given area).

All EID documents reviewed from 2013 to 2024 were internally consistent and factually referenced. They are sound documents. The problem arose when attempting to combine the data in each into summary tables on both supply and demand of water.

Table 6: Water Supply for EID Area

EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	67,190
Sub Total Planned	-	-	7,500	30,000	37,500
Recycled water	2,800	-	-	-	2,800
TOTAL Acre Feet	25,800	27,190	24,500	30,000	107,490
CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490	
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871	

Note that the table is consistent with the totals given by EID in their public service infrastructure: EID MSR & SOI Update pages 7-16.

EDH Water Supply

Unfortunately, EID does not give – or I could not find– EDH's supply broken out from the above table.

I developed a ratio from EID's 2019 supply breakdown where I determined that EDH uses 28.7% of EID total supply. The table below summarizes my assumptions:

- EDH takes 42.1% of the EID total supply, Table 11.

	Tota EID		EDH	Other + P'ville	Est+West+ otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	14,684	55.9%	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	3,225	12.3%	2,015	-	1,210
Sub Total Ag	3,803	14.5%	137	-	3,666
Sub Total P'ville + other	4,571	17.4%	-	4,571	-
Total Usage 2019	26,283	100.0%	11,078	4,571	10,634

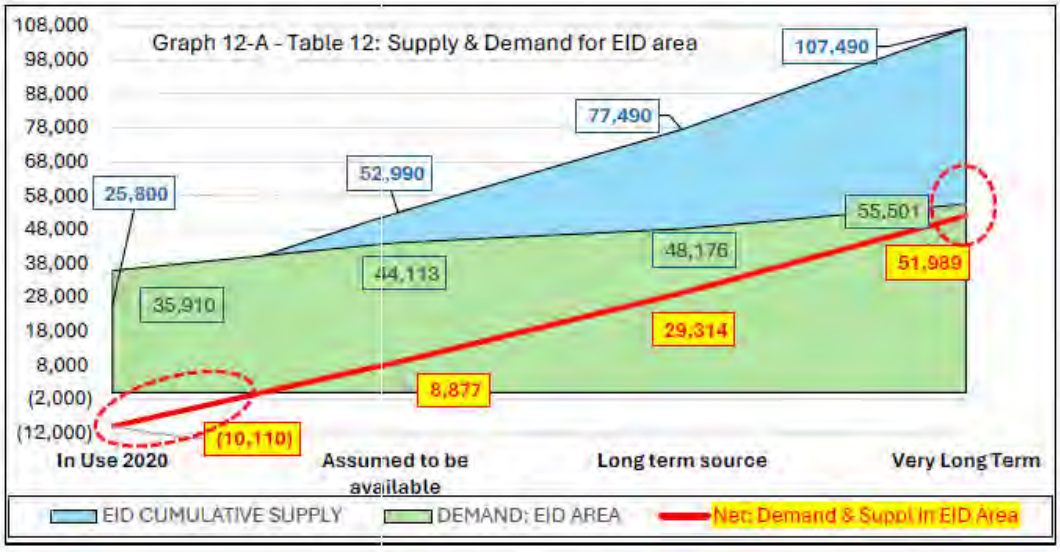
➢ Where (residential takes 55.9% of total plus 12.3% for commercial uses etc. to give EDH a total of 68.2%; that when multiplied by 42.1%-acre feet of water share, gives a factor of 28.7% representing EDH's share of total EID water supply.

I detail this assumption because it is critical in determining the supply and demand estimate for the EDH area.

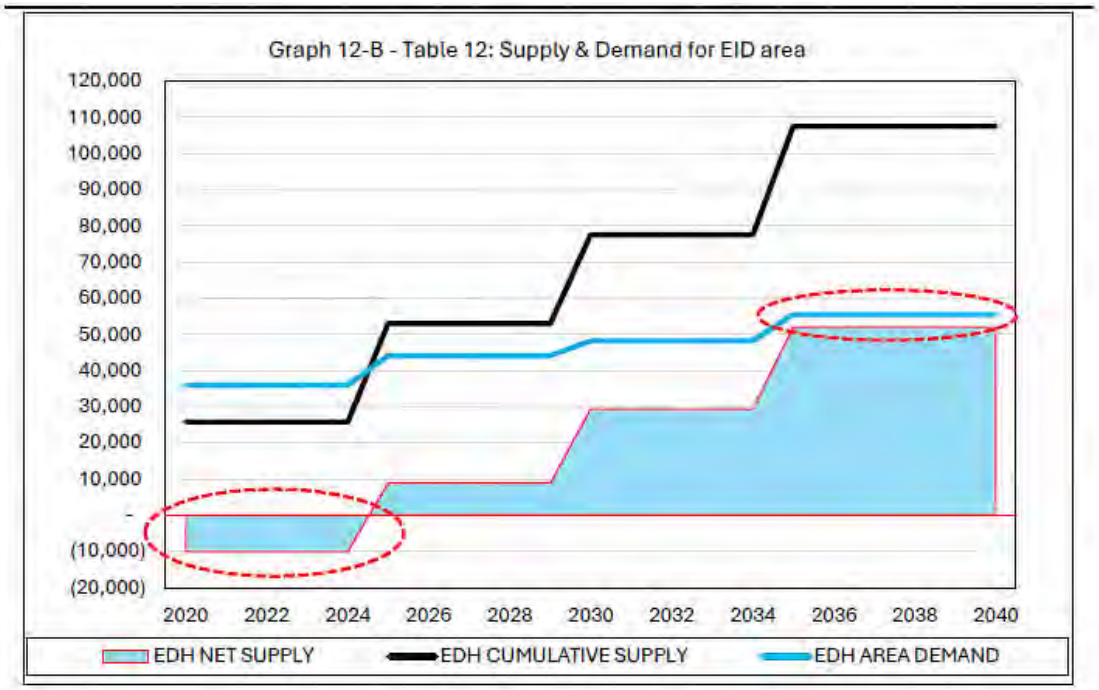
Neither Tully & Young nor the Proponent (Marble Valley LLC) make this distinction. It is only with this desegregation can anyone make the necessary nexus with EID's acre feet projections and the EDH pipeline. The positive supply availability statements made rely exclusively on EID's total supply to reach their availability supply statements regarding EDH. I maintain that this is erroneous because it is not that EID Area has a problem of water supply, but EDH as an area within EID that does.

Supply & demand for the EID area (Table 12).

SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



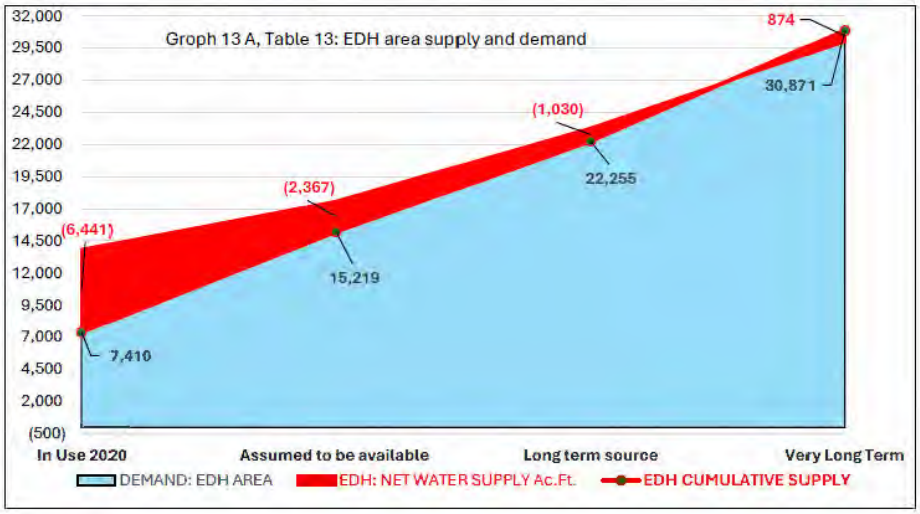
Maybe viewing the data in a different graph (12-B) shall illustrate EID's overall supply and demand situation better showing a small deficit in the 2020/25 period largely because of the net water demand of approved projects in the area. The data also shows that in the very long term the S&D balance is "thin".

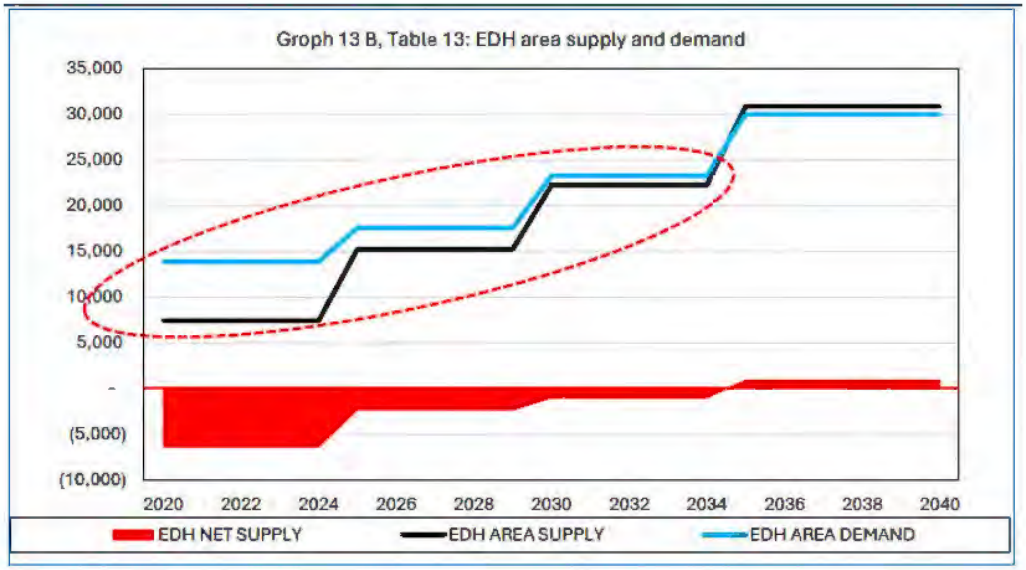


Conclusion: The EID area is not particularly threatened by a deficit of supply except possibly in the short run. However, this is largely dependent on the current net demand situation, that given the coarseness of the demand data derived requires better market data.

Supply & demand for the EDH area (Table 13)

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**





The data suggests that on a local - EDH -level the supply and demand situation appear in a deficit of supply, not only in the short run, but also in the medium and long term.

Sensitivity Analysis

This study would be incomplete unless a sensitivity analysis were conducted on the two of the most sensitive variables to assess the severity of supply and demand imbalance:

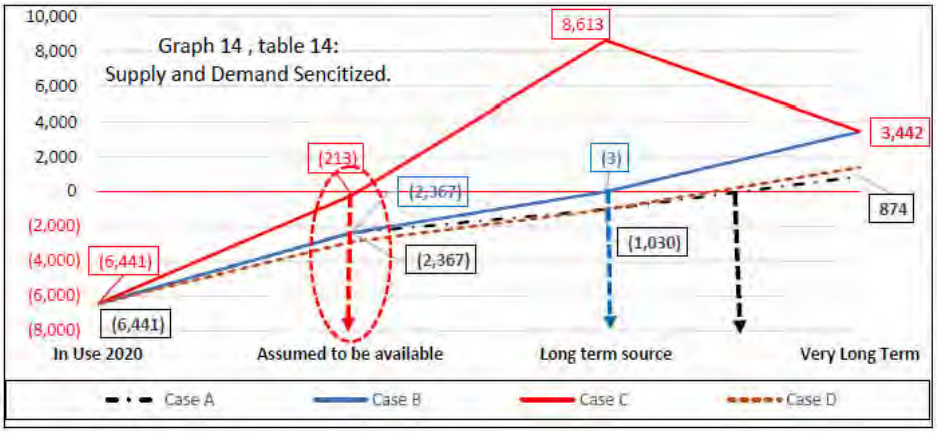
➢ For water supply, which in this case is dependent on EID's capital investment program to secure the water right in Exhibits 8 & 9; and

➢ the predicted absorption of residential units in the EDH area – particularly in the short run.

Table 14: Variables sensitized (in red).

EDH Area	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	Ac-Ft brought forward "assumed available)2025-30
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	(3)	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

I modified the absorption to benefit the overall availability of water and in one case brought forward Permit 2112 (Warren Act)17000 ac. Ft.+ CVP Contract- Fazio 7500 ac. Ft. Below the results graphed for the EDH area:



As the arrows show, no matter what, EDH has an imbalance of supply of water, particularly in the short run.

Mr. Dunn's full documentation is attached as:

ExhibitW-FULL	EDH WATER - Supply + Demand Analysis -W-FULL.pdf
ExhibitW1	EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf
ExhibitW2	EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf
ExhibitW3	EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf
ExhibitW4	EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf
ExhibitW5	EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf
ExhibitW6	EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf
ExhibitW7	EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf
ExhibitW8	EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf
Exhibit A-Dunn1	EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf
Exhibit A-Dunn2	MARBLE VALLEY LAND USE STUDY-A-Dunn2.pdf

Comments submitted to EDH APAC by Cameron Park Residents

Complicating the analysis of the Village of Marble Valley Specific Plan's DEIR is its proximity to the Community of Cameron Park, and its entanglement with the proposed Lime Rock Village Specific Plan. Several Cameron Park residents have forwarded the following Summary from the Cameron Park Estates Home Owners Association. As a courtesy to our Cameron Park neighbors, EDH APAC is incorporating their Cameron Park Estates Home Owners Association's summary by reference below:

SUMMARY POINTS FOR VILLAGE OF MARBLE VALLEY CHANGE IN GENERAL PLAN

The Draft EIR prepared for the Village of Marble Valley Specific Plan Draft EIR 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.

Concerns with the project and the Draft EIR include:

• The project conflicts with the adopted El Dorado County General Plan.
• The project 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.
• The Project Description is missing details of when and how the project will be implemented, where the emergency vehicle access (EVA) points and routes will be located, and the lack of certainty regarding the project that will be implemented versus what is described in the Draft EIR due to the provision to allow transfer of development rights throughout the non-residential and residential areas of the site, which could exacerbate environmental impacts beyond what is disclosed in the Draft EIR.
• 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;
• The Project Description lacks details regarding EVAs, including the location and proposed routes of the five specific emergency vehicle access points identified on page 3.7-23 and provides conflicting information regarding the number of EVAs. The Draft EIR lacks analysis of the EVAs, including any improvements for the EVAs and routes.
• The Draft EIR presents an inaccurate depiction of views of the project site, including views from US 50, Country Club Drive, and nearby uses. [This is a great spot to insert pictures of high-quality views of the site, including the quarry lake, ridgelines, demonstrating the extent of existing views, from US 50, Country Club Drive, and other roads/trails in the vicinity. Changes to public views are more important under CEQA than changes to private views.]

• The Draft EIR does not fully evaluate impacts to scenic resources and the visual quality and character of the site and its surroundings, including changes to public views of the project site.
• 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.
• The Draft EIR lacks analysis of impacts related to increases in nighttime lighting, including the extent to which nighttime lighting will have an effect on surrounding lands and the region, and lacks analysis of how VMVSP policies and mitigation measures will result in a meaningful reduction in the impact.
• The Draft EIR only addresses a limited amount of the special-status birds, wildlife, and other species that are known to occur in the region that may use the project site, lacks identification and analysis of potential wildlife migration corridors on the site, does not address the full extent of protected species that use the site and how impacts will be reduced to raptors, owls, egrets, and wildlife species that likely use the site and are known to occur in broader region, including identification of the wildlife migration corridors present on the project site and how those would be affected.
• The Draft EIR does not identify the full range of toxic air contaminants that may be associated with the project, does not evaluate the health effects of potential exposure to toxic air contaminants, and lacks mitigation to address hazards to the public including exposure to toxic air contaminants and asbestos.
• The 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 EVAs 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 Draft EIR does not address any solution to the water shortage in the area and in the county in general. Many areas in California including El Dorado County have water shortages and lack of sufficient ground and well water. This project would contribute to future water shortages.

Air Quality

Submitted to EDH APAC by a concerned Cameron Park resident.

Village of Marble Valley Specific Plan (VMVSP) DEIR Air Quality Comments

General Comments:

Diesel Exhaust Emissions Quantification Errors

- **Omission of SO_2 Emissions and Omission of Local NO_2 Impacts:** (DEIR Page 3.2-9): "[Footote 3]: As discussed above, there are also ambient air quality standards for SO_2… However, these pollutants are typically associated with industrial sources, which are not included as part of the project. Accordingly, they are not evaluated further. [Footnote 4]: Most emission of NO_x are in the form of nitric oxide… Conversion to NO_2 occurs in the atmosphere as pollutants disperse downwind. Accordingly, NO_2 is not considered a local pollutant of concern for the proposed project and is not evaluated further"

Discussion:

SO2: Emissions of SO_2 occur commonly in diesel-fired equipment, including mobile on-road and off-road sources, due to the presence of sulfur in diesel. Even though formulations of diesel are required to be "Ultra Low Sulfur Diesel" (ULSD), there are still SO_2 emissions, and this is a material omission/error in quantification.

NO_x: While it is true that emissions of NO_x from mobile sources tend to be predominantly in the form of NO, combustion of diesel does lead to a non-trivial quantity of NO_2, with ratios of NO_2/NO varying depending on engine load, cold-start, and many other factors. For heavy-duty diesel engines, the percentage of No2 in NOx can range anywhere from 10 – 30% during normal operation, while in diesel-powered passenger vehicles it can be up to 60%[1]. Primary oxidation of N_2 to NO occurs around 1000K, while secondary oxidation to NO_2 occurs around 1500K, hence the contribution from cold starts and low loads in diesel-powered construction equipment. A conservative approach to NO_x and NO_2 should be taken since NO_x is an ozone precursor, and NO_2 does present local health impacts.

- **Potential underquantification of emissions from heavy-duty diesel truck emissions (and associated health impacts)**

The study (Appendix C) relies heavily on CalEEMod runs, a model that is used commonly for construction emissions modeling in California. While such a long construction period with a wide variety of potential scenarios can create a number of issues when estimating associated emissions, it is not clear that the Applicant quantified heavy-duty diesel truck emissions to the nearest highway (or beyond) which would provide a more representative estimate of DPM, NO_x, SO_2, and other associated emissions (see next point) associated with the impacts from new heavy-duty diesel truck trips associated with construction and operation of the proposed project. This may underestimate the project and cumulative health impacts associated with diesel emissions to the public from the project (including to proposed sensitive receptors, e.g., the middle school, slated for construction during construction year 12).

- **Absence of speciation/calculation of TAC/HAP from diesel combustion emissions (and associated health impacts)**

While DPM is the primary toxic air contaminant (TAC) of concern associated with diesel combustion, organic and particulate fractions of emissions from diesel combustion can be further speciated into TAC/hazardous air pollutants (HAP, also considered to be TAC under California Air Resources Board

(ARB) law). Example compounds include the following: acrolein, benzene, 1,3-butadiene, formaldehyde, ethyl benzene, hexane, propionaldehyde, styrene, xylene, chrysene, and naphthalene. Such specifications are available via EPA MOVES guidance on Mobile Source Air Toxics (MSAT)[1]. In the absence of the quantification of these compounds, potential health impacts to the public (including sensitive receptors) cannot be ascertained and the project's overall health impact cannot be determined.

General Mobile Source Emissions Quantification Errors or Omissions

- **Absence of information around impacts from additional annual average daily traffic (AADT) from proposed project**

Appendix C (Air Quality) provides an additional 37,927 AADT associated with the build out of the VMVSP relative to a baseline AADT on Highway 50 of 61,000 – 62,000 AADT. The increase of ~61% AADT is quite substantial and warrants an evaluation of associated emissions and health impacts. It is unclear whether emissions (both criteria pollutant and TAC/HAP) from the additional AADT have been considered in the analysis. The omission of this analysis does not enable an assessment of the potential health impacts to the community within the VMVSP nor to the surrounding community from increases in mobile source criteria pollutant and TAC/HAP emissions. Such impacts may be acute (short-term); chronic (long-term but non-cancerous); or additional cancer cases. Additionally, since the Sacramento Federal Nonattainment Area (SFNA, which includes the western portion of El Dorado County) is in severe non-attainment for ozone, the impacts from the proposed VMVSP on achieving attainment with the National Ambient Air Quality Standard (NAAQ) for ozone by August 3, 2033 (and the impact on current air quality) cannot be assessed (see discussion on the lack of EPA air monitors in El Dorado County below).

Cumulative Impacts Analysis Does Not Provide Adequate Information to Determine Impact of Project

While the California Building Industry Association v. Bay Area Air Quality Management District (2015) decision did not affirm that CEQA required an "analysis of how existing environmental conditions will impact future residents or users (receptors) of a proposed project", lead agencies may still need to determine whether environmental impacts from a project will exacerbate existing environmental conditions[1].

With numerous development projects underway in the Folsom area, and several proposed adjacent to the project area, along with construction and operational impacts to sensitive receptors possible during the protracted construction period (2025 – 2045), it is likely that the project will present even more severe incremental impacts to the environment and health of the community. BAAQMD's recent 2022 CEQA guideline update ("nonbinding recommendations intended to assist lead agencies with navigating the CEQA process"[2]) address this in Section 5: Project-Level Air Quality Impacts, by providing recommended project and cumulative impacts thresholds. While El Dorado County Air Pollution Control District (EDCAPCD) has a project-level threshold of 10 in one million cancer cases,

such an evaluation (with all TACs considered) would provide the public with transparency into cumulative health impacts from the project and nearby development projects.

Additionally, commuting emissions impacts to the SFNA weren't quantified as part of the DEIR. Available data suggest a mean commute time of 29.3 minutes each way for residents of El Dorado County. These emissions are likely to be dispersed throughout the SFNA, increasing atmospheric ozone concentrations beyond those already designated as "severe non-attainment". While emissions from motor vehicles are anticipated to decline over time as lower emissions options become available, impacts to public health from the additional 37,927 AADT associated with the proposed project are not negligible. One such example of cumulative impacts of ozone in regions designated as non-attainment have occurred in recent weeks within the South Coast Air Quality Management District and other Southern California air districts where atmospheric ozone concentrations were such that the public was advised by regional air agencies to avoid fueling for several days at a time during daytime hours to help minimize impacts to regional ozone concentrations[3].

Lack of Quantitative Assessment of Health Impacts from Proposed Project

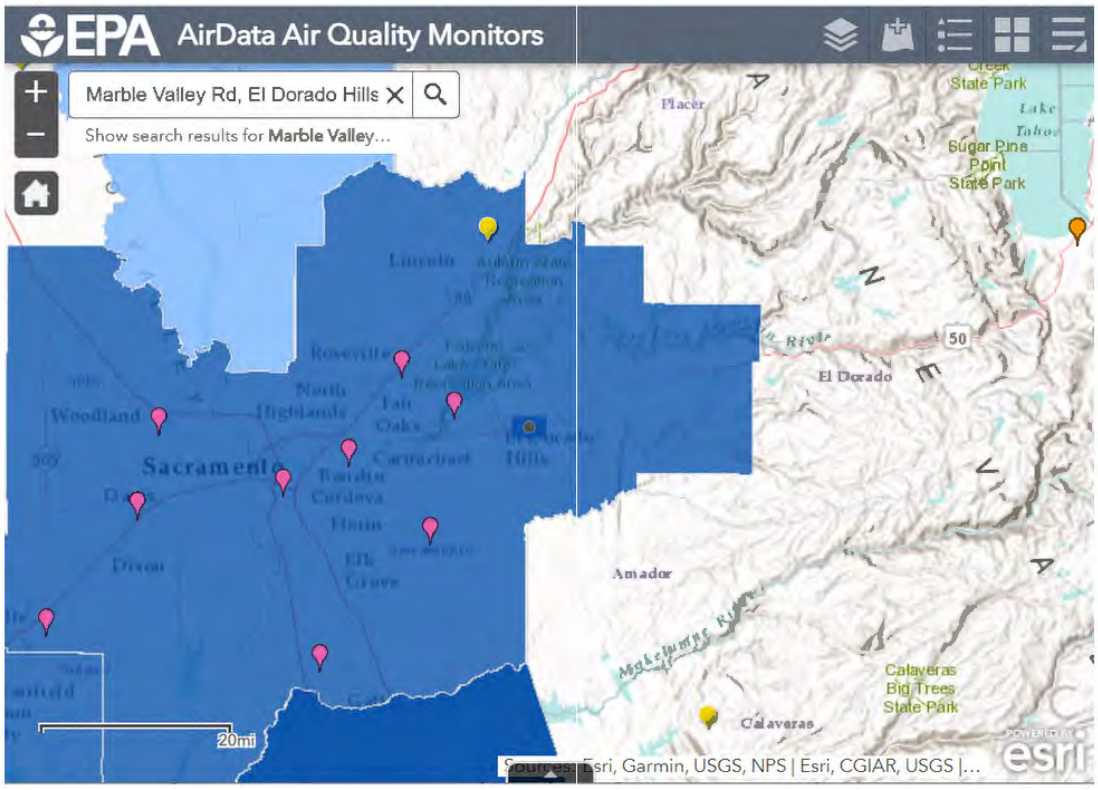
While the DEIR and associated Air Quality Appendix presents emissions of DPM (and a qualitative discussion of health impacts) associated with the proposed project, there are a number of omissions:

1. A quantitative assessment of risk from DPM to the residents and public residing in the VMVSP during the 20-year construction period is not included in the analysis. A CO Hot-Spots analysis was conducted, but there is not a quantitative analysis of the impacts of DPM emissions on the residents of the community (including impacts to students at the proposed middle school, which will be operational during concurrent construction of the community, exposing them to emissions of DPM). Such analyses should be performed using AERMOD and site-specific meteorological information since spatial and temporal elements are included to improve the accuracy of such modeling outputs.

2. As noted above, it is not clear whether TAC/HAP emissions from on-road mobile sources from the VMVSP were quantified. When such emissions are quantified, a quantitative health risk assessment should be performed to provide the public with an accurate representation of the potential acute, non-cancer chronic, and cancer-related health impacts associated with the proposed project.

3. As noted within the DEIR and Appendix C accompanying the DEIR, there are no EPA air quality monitoring stations near the study area. The nearest monitor with an adequate amount of ozone baseline data is located in Sacramento County (50 Natoma St, Folsom). It is recommended (as a potential mitigation measure) that the project applicant fund the installation of ozone and particulate monitoring stations near the proposed project and prohibit construction on days where either the NAAQS or Air Quality Index (AQI) exceed certain values to be protective of public health. A map representing the nearest air quality monitoring stations (pink are ozone monitoring stations) and the boundary of the severe non-attainment area for ozone are presented as Figure 1 below).

Figure 1. EPA AirData Air Quality Monitors for the Study Region



Inadequacy of Proposed Mitigation Measures

While the implementation of mitigation measures to increase park lands, preserve open space, and provide bike trails as an alternative means of transport are desirable and broadly supported, they do not reduce the outdoor inhalation burden of additional criteria pollutants and TAC/HAP from the proposed project. In fact, since the mean commute time in El Dorado County is ~29 minutes, the addition of bike paths cannot be expected to decrease the number of motor vehicles on the road. Residents biking and enjoying park facilities will be exposed to the additional criteria pollutant and TAC/HAP emissions from the proposed project without abatement while outdoors since the installation of MERV 6 and MERV 8 filtration in residential buildings will only protect residents while they are indoors.

[Footnotes]

[1] https://www.respire-asso.org/wp-content/uploads/2015/09/2015_09_Five_facts_about_diesel_FINAL.pdf

[2]
Furthermore, the EPA has identified 20 Key Mobile Source Air Toxics associated with either evaporative or exhaust emissions from mobile source combustion.
https://www.epa.gov/sites/default/files/2019-08/documents/1050am_cook_508_0.pdf

[3]
Practical Recommendations for Implementing California Supreme Court's Latest CEQA Decision - Court: CEQA Does Not Generally Require an Analysis of Environment's Impacts on a Project | Casetext

[4]
https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en

[5]
California Drivers Told To Avoid Gas Stations in Multiple Cities (msn.com) (June 2024), Drivers Told To Avoid Gas Stations Across Multiple States - Newsweek (June 2024)

Conclusion

EDH APAC appreciates the engagement of the project applicants in our community. The applicant spent a significant amount of time at our June 2024 EDH APAC public meeting, providing a presentation of the project elements, discussing aspects of the project, and answering questions from EDH APAC meeting attendees.

We look forward to providing additional input and feedback on the project, and encourage the applicant to continue active engagement with the community to clarify issues, concerns, and mitigations as the approval and entitlements process continues.

EDH APAC appreciates the opportunity to review and provide resident feedback on development projects in and around the El Dorado Hills Community.

John Davey Chair
Tim White Vice Chair
John Raslear Vice Chair
Brooke Washburn Vice Chair

El Dorado Hills Area Planning Advisory Committee
“Non-Partisan Volunteers Planning Our Future Since 1981”

INTERNAL MEMORANDUM

To: John Davy, Chairman, El Dorado Hills APAC
From: Alastair, APAC voting member.
Subject: Marble Valley – Water Availability

Purpose
The purpose of this memorandum to EDH-APAC is to:

a) Examine the documentation prepared for the Village of Marble Valley Specific Plan Draft Environmental Impact Report May 2024 regarding the supply and demand of potable water for the project,
b) Review the EID documents asserting the sufficiency, availability and sustainability of water for projects in the El Dorado Hills (EDH) area, and
c) Present an analysis of EID data tables referring to the supply and demand of water in El Dorado Hills (EDH) area.

The ensuing document is prepared for El Dorado Hills Area Planning Council (APAC) for their consideration in commenting on the Marble Valley DEIR. As such it is a personal and informal memorandum and not presented as a formal commissioned document.

Foreword
I apologize in advance for the document's length, detail and extensive use of tables and graphs to qualify the points I wish to underscore. The following documents were reviewed:

- DEIR, Water Supply Assessment, Tully & Young, October (2021)
- Valley of Marble Valley Specific Plan, DEIR, May,2024: Other Considerations, Impact Analysis.
- BAE Memorandum, November 2023
- EID's Uban Water Master Plan 2020, Chapters: 2 Water Service and System Description, 3 Water Supply, 4 Water Use, 5 Water System Reliability.
- Tully & Young Memorandum, May 2014 (19-1670 G 216 of 360)
- El Dorado Water Supply Assessment for Central El Dorado Specific Plan, August 2013.

The Marble Valley DEIR document constantly refers to past EID studies now between 11 and 5 years old, which to my mind brings into question the validity of the statements made in the DEIR itself.

On the 11th, June last in the Planning Department's presentation in Cameron Park of Marble Valley and Lime Rock Valley, the proponents' leaflets on Water Supply said: "Based on these estimates from the EID's Urban Water Management Plan (UWMP-2020) there would be sufficient water supply for the proposed project, as well as other planned developments". It is that assertion I wish to qualify in this document.

Methodology
I attempted to reconstruct the many tables presented by EID throughout the documents into Excel tables to clearly show both historical (2015-2020) and projected (2020-2040) data so that one may quantify the basis of the assertions made as to adequacy of water availability for future projects in EDH.

All data was taken from the referenced documents above. However, it was incredibly difficult to link the many tables referenced into a logical array. Accordingly, I had to make some assumptions to present an array of data from 2015 to 2040 in a logical manner.

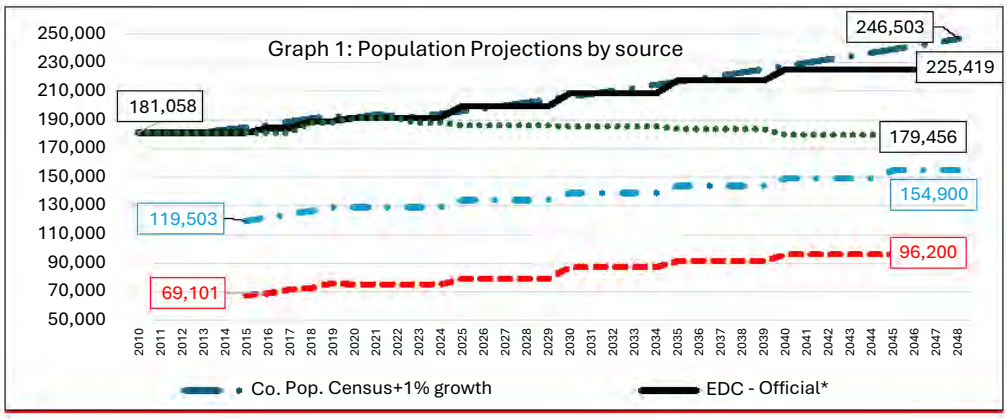
Particular attention was given to EDH's "pipeline*" of active and future projects undergoing the CEQA process in the County Planning website (projects in your area) to construct a nexus between residential units and acre feet of water to be supplied. See Exhibit A. (*Land developers generally refer to projects in the pipeline, to identify for planning purposes the number of residential units and commercial development for a given area).

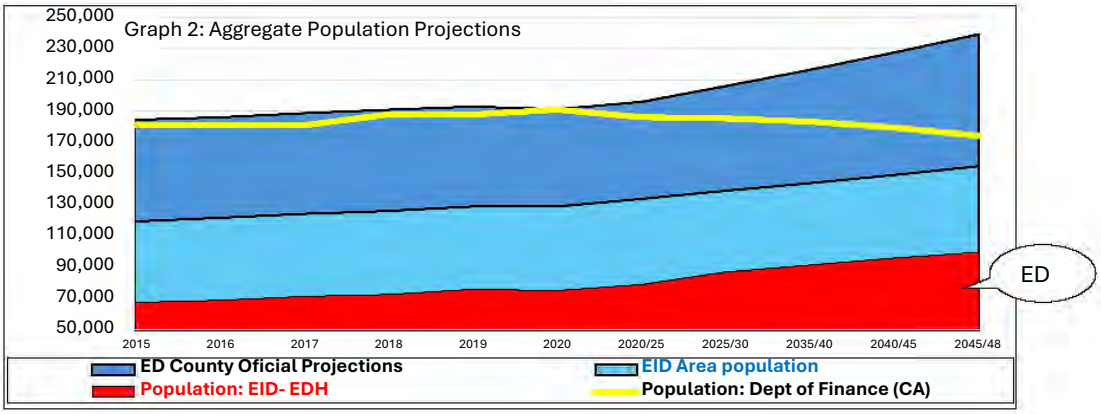
All EID documents reviewed from 2013 to 2024 were internally consistent and factually referenced. They are sound documents. The problem arose when attempting to combine the data in each into summary tables on both supply and demand of water. This data is presented in Exhibit 1 > 6.

SECTION ONE - WATER DEMAND

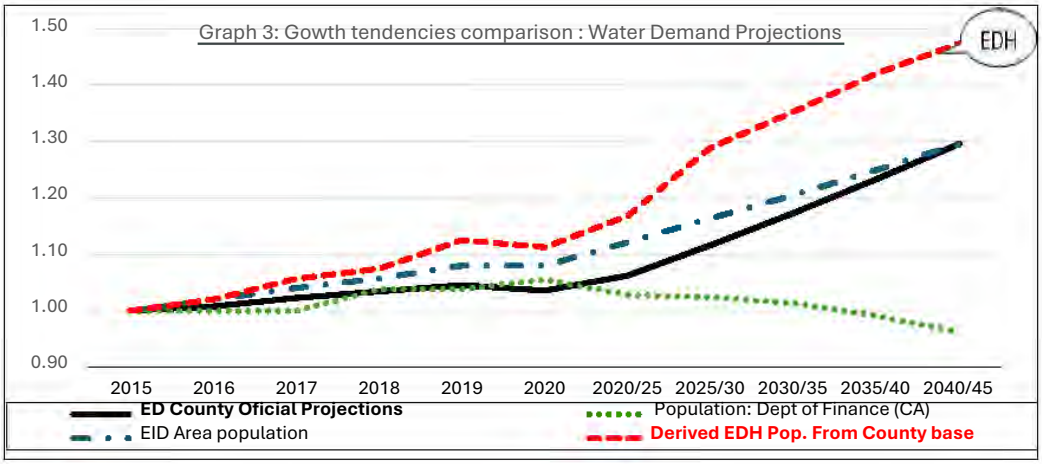
Population

In general terms, the demand for water is said to be based on population growth for El Dorado County. The graph below gives the population – historic and projected - for each area within the County.



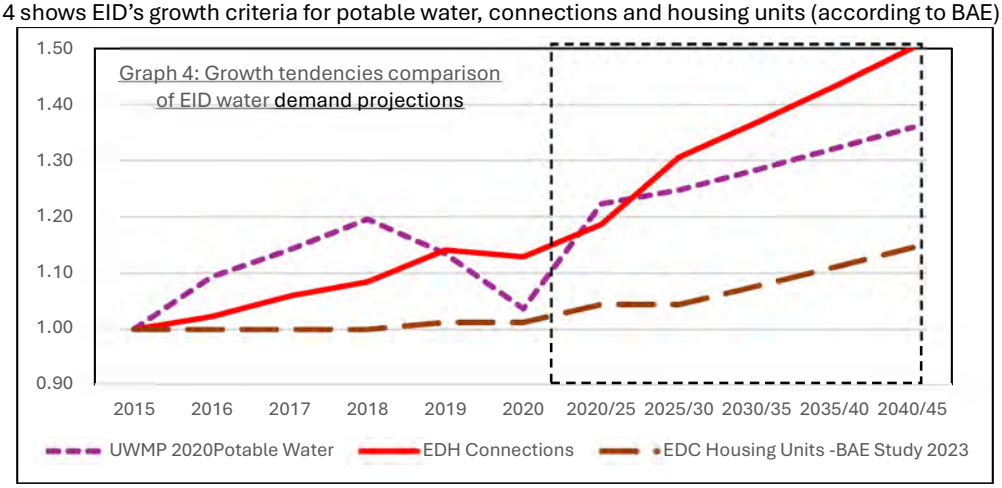


In projecting demand, it is necessary to measure the tendency (of growth) for each area referenced with base 100=2015 .....

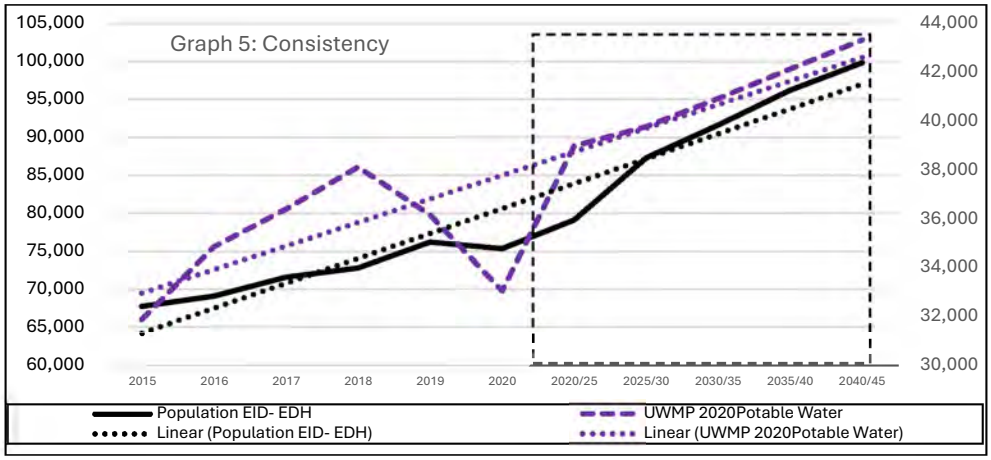


One should note that given County population data, EDH is to grow at a much faster rate than other areas. It is this projection I use in determining EDH area's growth in residential units.

Graph 4 shows EID's growth criteria for potable water, connections and housing units (according to BAE).



By visual inspection – given that both graphs 3 & 4 are on the same base 1.00 scale -one may conclude that, depending on what projection is taken, the resulting prediction shall be different. Fortunately, one set of data that - visually – gives one comfort, as indicated in graph 5. Both the EID "official" population projection and the UWMP potable demand projection have a similar slope.

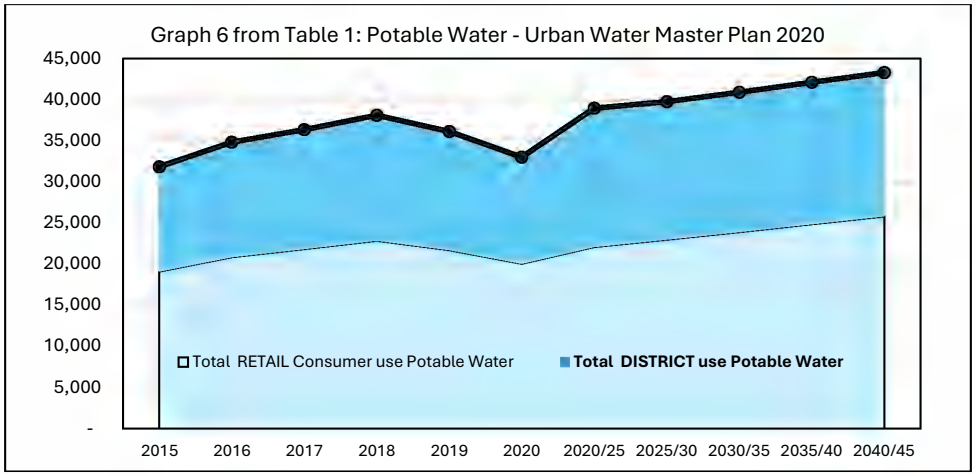


UWMP 2020 Projections: Table 1

Urban Water Master Plan 2020	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
EDH Consumer use Potable Water	9,570	10,197	11,099	11,385	11,078	12,220					
Weast + East service areas	9,544	10,675	10,743	11,472	10,635	7,850					
Total Retail Consumer use Potable W	**19,114**	**20,872**	**21,842**	**22,857**	**21,713**	**20,070**	**22,110**	**23,010**	**23,910**	**24,880**	**25,820**
City Pvill+ditc+other+recycle	1,830	2,047	2,060	2,200	2,039	1,505	4,240	4,240	4,240	4,240	4,240
Other+Ag.potb.+Loss	10,919	11,923	12,477	13,057	12,403	11,465	12,630	12,520	12,770	13,010	13,260
al DISTRICT use Potable Water	**31,863**	**34,842**	**36,379**	**38,114**	**36,156**	**33,040**	**38,980**	**39,770**	**40,920**	**42,130**	**43,320**

This table is a composite of several EID tables in the UWMP 2020

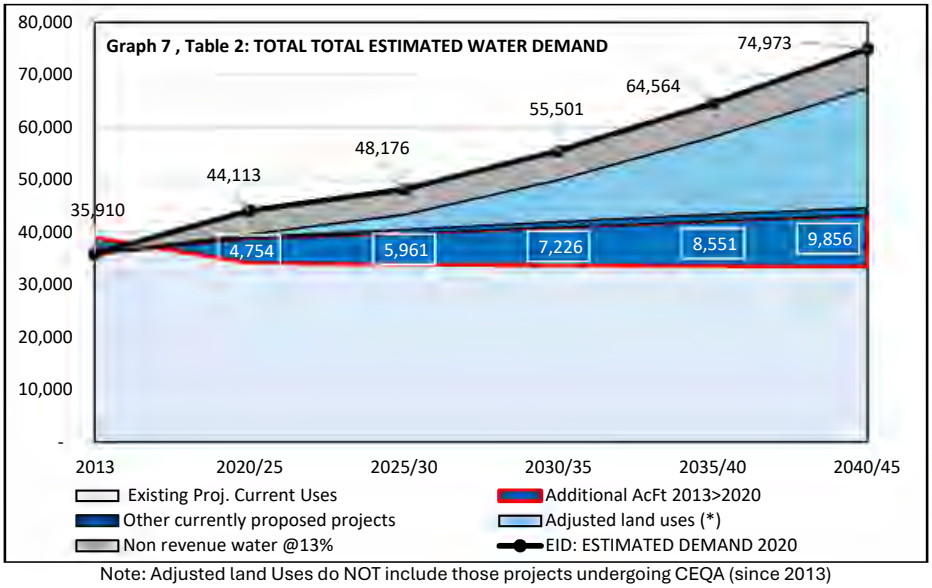
Graph 6 below is comprised of above data lines: Total Retail Consumer Potable Water (61% of total in 2020) and Total District Potable Water to give EIDs aggregate potable water demand.



EID's Projected Aggregate Demand - Table 2 in ac. ft.

Water Supply Asst Table 3-2(2013)	(FINAL) ESTIMATED WATER DEMAND					
Table 3-1, pg 3-8	2013	2020/25	2025/30	2030/35	2035/40	2040/45
Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464
Other currently proposed projects	0	163	696	1,052	1,272	1,332
Adjusted land uses	0	514	2,853	7,975	14,718	22,830
Non revenue water @13%	0	4,528	4,857	5,554	6,444	7,491
TOTAL Ac.Ft. DEMAND (2013)	**38,984**	**39,359**	**42,215**	**48,275**	**56,013**	**65,117**
Dif: UWMP 2020 (-) Demand 2013	(3,074)	4,754	5,961	7,226	8,551	9,856
EID: ESTIMATED DEMAND 2020	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**
EDH: ESTIMATED DEMAND 2020	**10,313**	**12,669**	**13,836**	**15,940**	**18,543**	**21,532**

Note, the table was constructed from information given by EID in various reports and aggregated by me. It is not an EID (or Tully) table.



Note: Adjusted land Uses do NOT include those projects undergoing CEQA (since 2013)

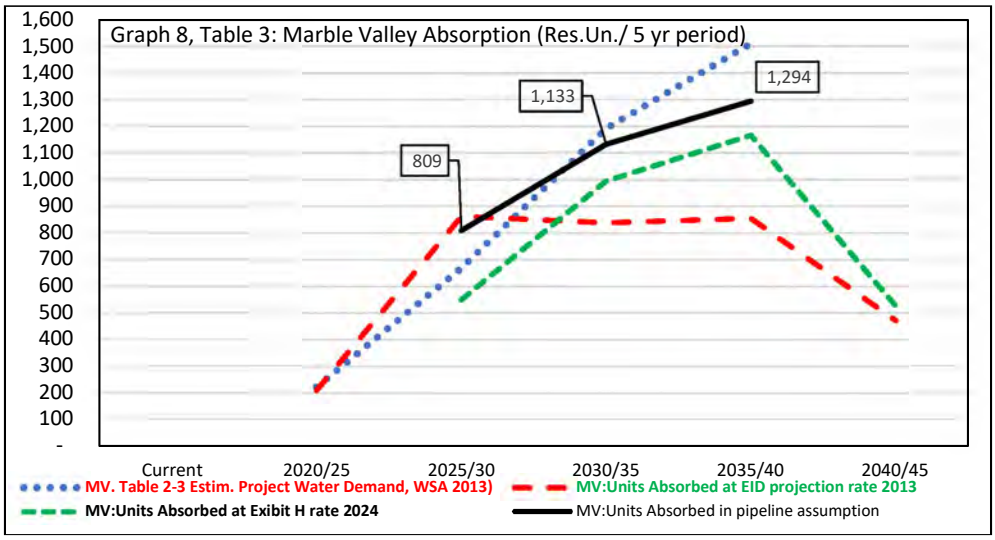
SECTION TWO: PIPELINE ANALYSIS

Marble Valley Absorptions

It appears that Marble Valley has projected – either stated in units or implied in acre feet- various absorptions rates as shown in Table 3 & Graph 8, below.

(*) Absorption refers to the number of units sold during a defined period (year) within a specific market area.)

Table 3 - Marble Valley	Current	2020/25	2025/30	2030/35	2035/40	2040/45	TOTAL
MV. Table 2-3 Estim. Project Water Demand, V		222	669	1,192	1,510		3,593
MV:Units Absorbed at EID projection rate 2013		210	862	838	855	471	3,236
MV:Units Absorbed at Exibit H rate 2024			549	995	1,166	526	3,236
MV:Units Absorbed in pipeline assumption			**809**	**1,133**	**1,294**		**3,236**



I point out these various Marble Valley absorptions to show the difference between EID's projections and mine for Marble Valley. The observation I make is the absorption changes over time over eleven years. In short, I doubt that the projection in Exhibit H reflects Marble Valley LLC's expectations, because if true their IRR/ NPV would be very low. In short, Marble Valley's water demand should reflect their expected absorption based on a market study that would also predict EID's water demand expectations.

Projected Absorption in residential units (see Exhibit 7).

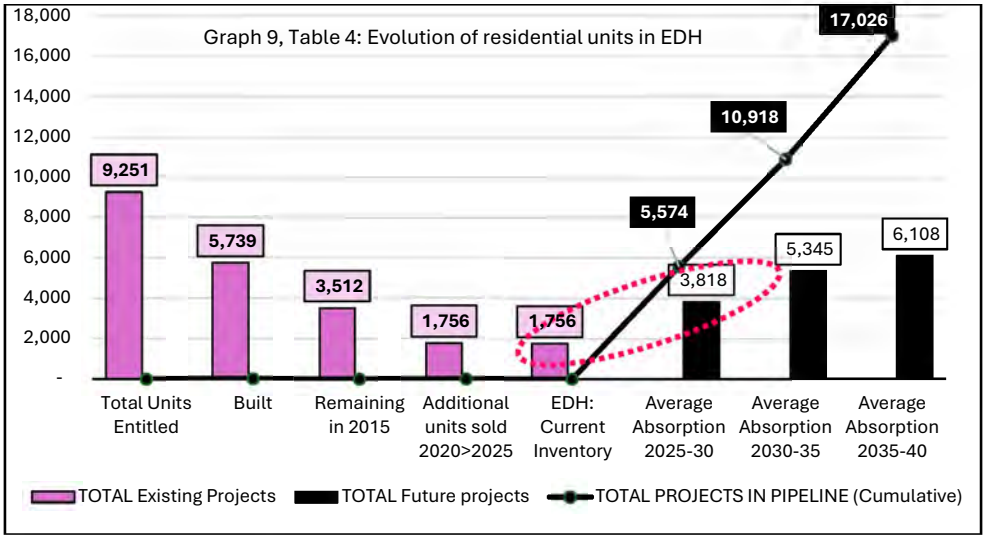
A critical difference between my pipeline projection for the EDH area and those stated, or implied, in EID Studies, is the absorption of residential units over time. EID projects project by population growth and translates that growth into units and acres to project acre feet of water. (Table 2-3 Estimated Project Water Demand, Water Supply Assessment 2013).

The key difference between EID's water demand projections and mine, is that my predictor variable for demand is in the residential unit. While EID's demand is predicted using an average factor of 0.674* ac. ft. per dwelling unit. (Note: I obtained this ratio based on *Table 2-3- Marble Valley, Water Supply Assessment 2013).

Table 8 and Graph 8 show the evolution of residential units in the EDH area. The short term 2025-30 period is critical due to the 1756 net units in 2020/25 plus 3818 units projected to be absorbed to give a significant inventory of 5574 units by 2030, presuming an annual sales rate of 1115 units a year. This rate suggests that each of the eighteen (18) projects in the EDH area must sell an average of 62 units per year; very aggressive. However, EID has no option other than to plan for this extraordinary pipeline.

Note: I have not added an estimate for commercial, industrial and landscape water demand that could be 30%* more to arrive at the Equivalent Dwelling Unit (EDU) that is used for projecting water demand.
(* Table 2-3- MV Water Supply Assessment 2013). The actual demand projection could be understated by as much as 30%. I chose not to add this factor because the forecast is dire enough as it is.

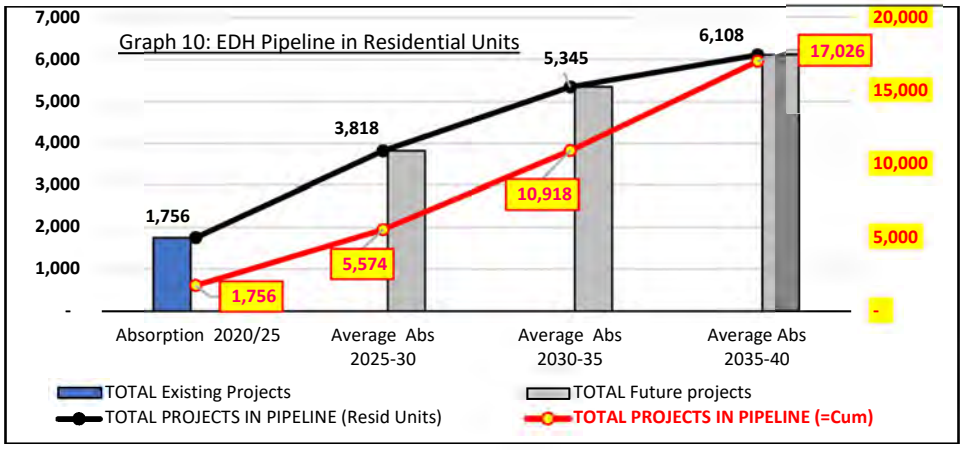
Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020>2025	EDH: Current Inventory	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	"PIPELINE" TOTAL RES. UNITS
TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**	-	-	-	**1,756**
TOTAL Future projects						3,818	5,345	6,108	15,270
TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**	**3,818**	**5,345**	**6,108**	**17,026**
TOTAL PROJECTS IN PIPELINE (Cumulative)						**5,574**	**10,918**	**17,026**	



The 2025/30 absorption period is particularly important for EID to determine with greater accuracy because it is "the" variable that determines – as we shall see – EDH's deficit of water supply in the short run.

Pipeline Analysis

In developer speak the number of residential units existing and approved for a given area is "the pipeline" and crucial to determine. This is one set of data EID has not undertaken. All EID studies refer to "projects in your area" (County Website) in the entitlement (CEQA) process. There is no attempt to establish the pipelines impact on supply of water. Note: It is the – red- "cumulative" pipeline used to compare with EID data.

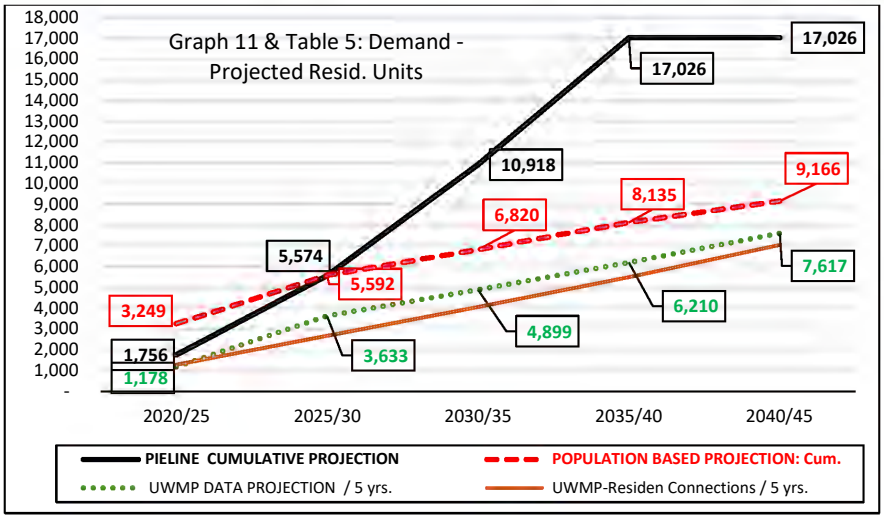


EDH Water Demand Projections

Using the same factor per dwelling unit as EID for UWMP data (0.674 ac. ft. per dwelling unit) one can compare the Projects in the Pipeline in the EID area in Table 5 and Graph 11 below.

Table 5: Cumulative Residential Units

PROJECTIONS : Cumulative	2020/25	2025/30	2030/35	2035/40	2040/45
PIELINE CUMULATIVE PROJECTION	1,756	5,574	10,918	17,026	17,026
POPULATION BASED PROJECTION: Cum.	3,249	5,592	6,820	8,135	9,166
UWMP DATA PROJECTION / 5 yrs.	1,178	3,633	4,899	6,210	7,617
UWMP-Residen Connections / 5 yrs.	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**



Note, the difference between my pipeline absorption and EID's is significant.

SECTION THREE: WATER SUPPLY

Exhibits 8>10 give the background to Table 10 below and highlights the water availability per period. EID and its consultants have updated the availability constantly depending on the infrastructure improvements made. However, I note that many supply figures (from 2015 to 2024) are couched with caveats. To make any water supply predictions for 2025/35 period this data must be assessed again today with realistic completion dates rather than caveats designed to cover oneself.

Table 6: Water Supply for EID Area

EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	**67,190**
Sub Total Planned	-	-	7,500	30,000	**37,500**
Recycled water	2,800	-	-	-	**2,800**
TOTAL Acre Feet	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**
CUMULATIVE SUPPLY	**25,800**	**52,990**	**77,490**	**107,490**	
EDH CUMULATIVE SUPPLY	**7,410**	**15,219**	**22,255**	**30,871**	

Note that the table is consistent with the totals given by EID in their public service infrastructure: EID MSR & SOI Update pages 7-16.

EDH Water Supply

Unfortunately, EID does not give – or I could not find– EDH's supply broken out from the above table.
I developed a ratio from EID's 2019 supply breakdown where I determined that EDH uses 28.7% of EID total supply. The table below summarizes my assumptions:

- EDH takes 42.1% of the EID total supply, Table 11.

	Tota EID		EDH	Other + P'ville	Est+West+ otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	**14,684**	**55.9%**	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	2,015	-	1,210
Sub Total Ag	**3,803**	14.5%	137	-	3,666
Sub Total P'ville + other	**4,571**	17.4%	-	4,571	-
Total Usage 2019	**26,283**	**100.0%**	**11,078**	**4,571**	**10,634**

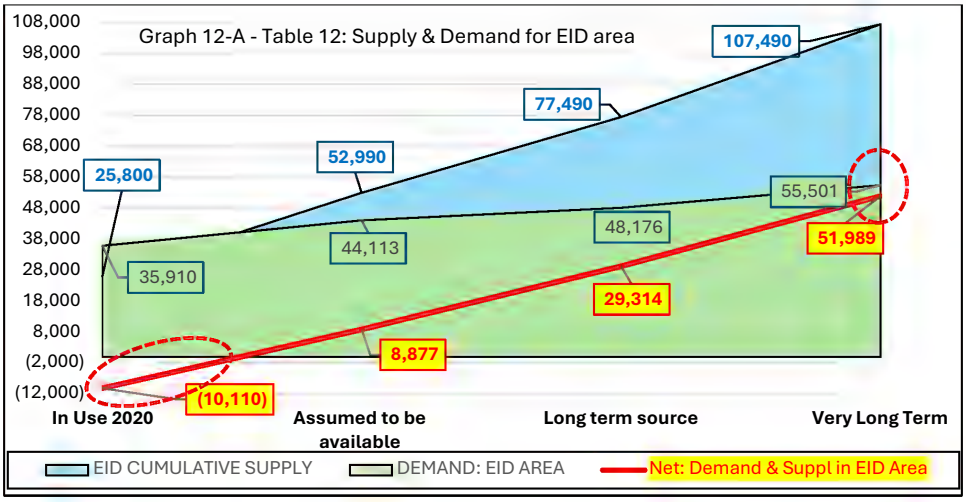
- Where (residential takes 55.9% of total plus 12.3% for commercial uses etc. to give EDH a total of 68.2%; that when multiplied by 42.1%-acre feet of water share, gives a **factor of 28.7%** representing EDH's share of total EID water supply.

I detail this assumption because it is critical in determining the supply and demand estimate for the EDH area. Neither Tully & Young nor the Proponent (Marble Valley LLC) make this distinction. It is only with this desegregation can anyone make the necessary **nexus** with EID's acre feet projections and the EDH pipeline. The positive supply availability statements made rely exclusively on EID's total supply to reach their availability supply statements regarding EDH. I maintain that this is erroneous because it is not that EID Area has a problem of water supply, but EDH as an area within EID that does.

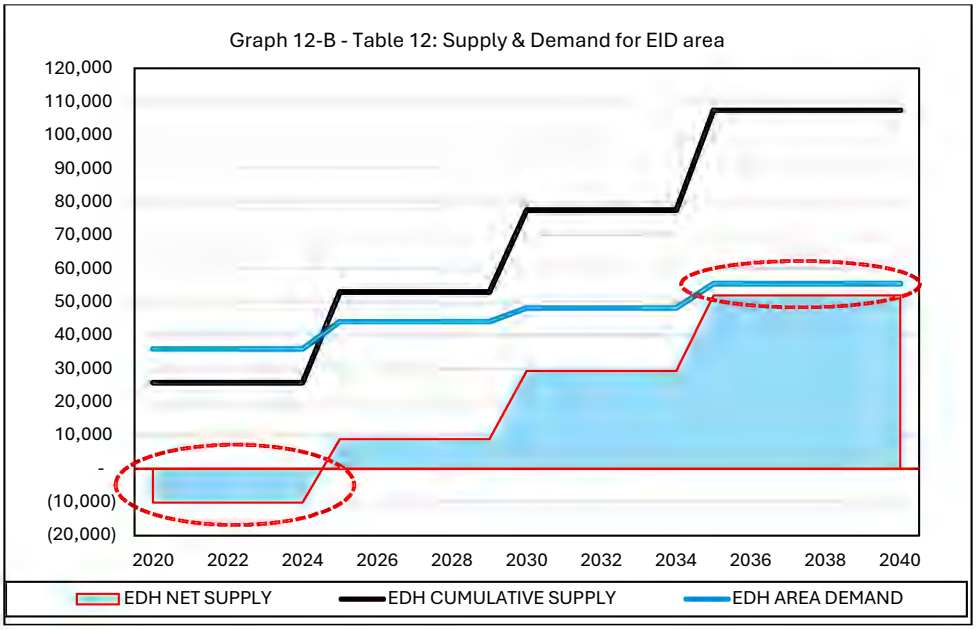
SECTION FOUR: SUPPLY & DEMAND

Supply & demand for the EID area (Table 12).

SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



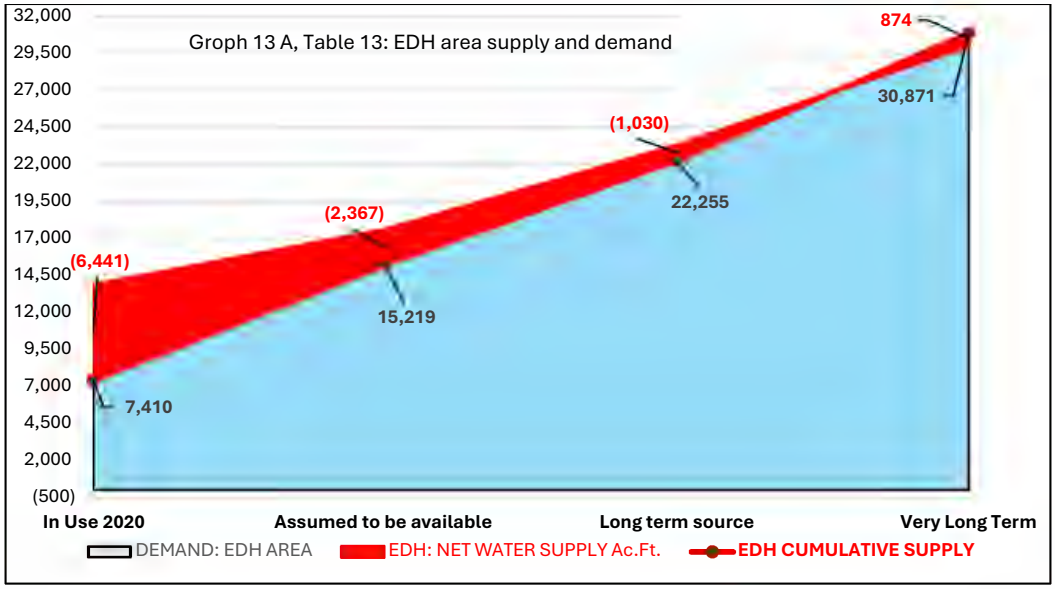
Maybe viewing the data in a different graph (12-B) shall illustrate EID's overall supply and demand situation better showing a small deficit in the 2020/25 period largely because of the net water demand of approved projects in the area. The data also shows that in the very long term the S&D balance is "thin".

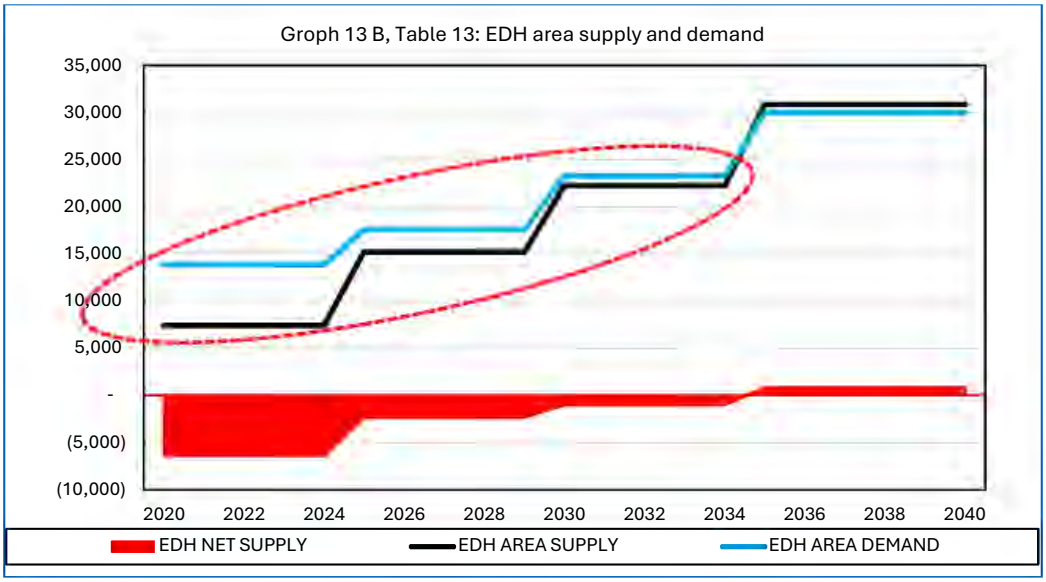


Conclusion: The EID area is not particularly threatened by a deficit of supply except possibly in the short run. However, this is largely dependent on the current net demand situation, that given the coarseness of the demand data derived requires better market data.

Supply & demand for the EDH area (Table 13)

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**





The data suggests that on a local - EDH -level the supply and demand situation appear in a deficit of supply, not only in the short run, but also in the medium and long term.

Sensitivity Analysis

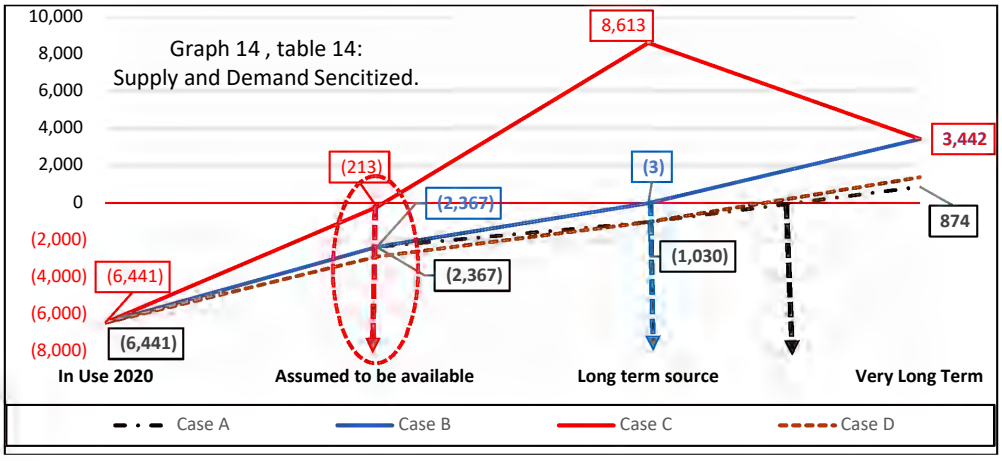
This study would be incomplete unless a sensitivity analysis were conducted on the two of the most sensitive variables to assess the severity of supply and demand imbalance:

- For water supply, which in this case is dependent on EID's capital investment program to secure the water right in Exhibits 8 & 9; and
- the predicted absorption of residential units in the EDH area – particularly in the short run.

Table 14: Variables sensitized (in red).

EDH Area	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	AcFt brought forward "assumed available)2025-30
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	(3)	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

I modified the absorption to benefit the overall availability of water and in one case brought forward Permit 2112 (Warren Act)17000 ac. Ft.+ CVP Contract- Fazio 7500 ac. Ft. Below the results graphed for the EDH area:



As the arrows show, no matter what, EDH has an imbalance of supply of water, particularly in the short run.

Summary:
Given the positive assertion that: "there is sufficient water to cover the needs of all EDH projects" in general and Marble Valley and Lime Rock Valley Specific Plans, in particular; is false.

The main issue of imbalance in the medium and long term is the certainty of water rights secured and capital improvements achieved, see Exhibit 8 & 9. It is beyond my ability and the scope of this work to make any qualifying remark other than to say; I am uncomfortable with the caveats made in memoranda qualifying EID's water availability. To quote one such caveat*: "The water rights applications and environmental analysis are still pending". And "the District cannot predict whether or when El Dorado Water Reliability Project may be approved". Indeed, the Tully and Young Memo of May 30, 2014, is rife with caveats that are now eleven ten years old.

Admittedly EID has achieved much since 2013, however, to continue to write long memos and outdated references in the Marble Valley DEIR underscoring the water rights secured and capital improvements made, it is imperative that a fresh review of these critical issues are factually reviewed, and if possible, qualified by a concrete probability (0 to 100) to give a measure of credibility as to water supply.
(*MSR & SOI Update (final) Public -Service & Infrastructure, page 7-16 in reference to 2010 EDWPA's environmental report).

SECTION FIVE: CONCLUSION

At this point, all I can say to EDH-APAC is: "Houston we have a problem". The fact that 17000 units are planned in the EDH area should give anyone reason to question the availability of water for such a fantastic, planned demand.

Throughout the DEIRs from 2013 to 2024 there are statements concluding that there "is" sufficient water to attend Marble Valley's (and Lime Rock's) potable water needs. I suggest that this is not true for the EDU area.

I sustain that APAC make the following comment on the Marble Valley DEIR 2024:

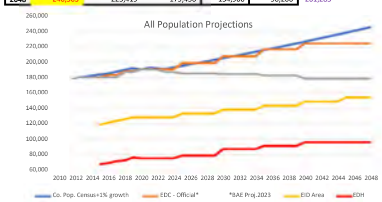
Regarding Appendix B - Consistency with the El Dorado County General Plan in objective 5.2.1.2 and 5.2.1.4:
The attached memorandum forwarded by an APAC Member suggests that:

- The Project Consistency statement made that there "is" sufficiency of water is not true.

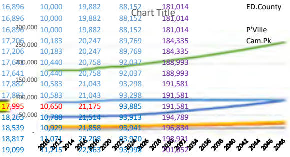
And as a recommendation state:

- The County must insist that the proponent, Marble Valley LLC have a full and proper update of the SB 610 Water Supply Assessment of August 2013 by Tully & Young updated prior to proceeding with any hearing by the Planning Commission for such a project.

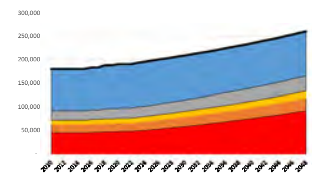
	Co. Pop. Censu	EDC - Official*	*BAE Proj.2023	EID Area	EDH	High Growth	EDH /EDCOff.	EDH-Census+ACD
1980	85,812			119,503	67,729		20%	17,162
1990	125,995			119,503	67,729	125,995	21%	26,459
	1.000%							2.500%
	*BAE Projections based on Dept of Fin (nov 2023)			WUMP:Table 2-11 pa		2022 base + % Growth		
2010	181,161	181,014	181,058			181,014		42,108
2011	180,963	181,014	181,058			181,014		43,563
2012	180,613	181,014	181,058			181,014		43,760
2013	181,529	181,014	181,058			181,014		44,206
2014	183,157	181,014	181,058			181,014		43,862
2015	184,627	181,014	181,058	119,503	67,729	181,014	37%	43,264
2016	186,027	184,335	181,058	121,853	69,101	184,335	37%	43,495
2017	188,793	184,335	181,058	124,316	71,555	184,335	39%	45,104
2018	190,925	188,993	187,940	126,316	72,779	188,993	39%	45,599
2019	193,057	188,993	187,940	129,056	76,199	188,993	40%	46,593
2020	191,245	**191,581**	**191,032**	**129,056**	**75,349**	191,581	39%	47,107
2021	193,704	191,581	191,032	129,056	75,349	191,581	39%	48,612
2022	192,787	191,581	191,032	129,056	75,349	191,581	39%	49,082
2023	192,215	191,581	188,131	129,056	75,349	194,789	39%	49,552
2024	194,137	191,581	188,131	129,056	75,349	196,834	39%	50,791
2025	196,079	199,521	186,186	**134,000**	79,100	198,921	40%	52,061
2026	198,039	199,521	186,186	134,000	79,100	201,052	40%	53,362
2027	200,020	199,521	186,186	134,000	79,100	203,228	40%	54,696
2028	202,020	199,521	186,186	134,000	79,100	205,450	40%	56,064
2029	204,040	199,521	186,186	134,000	79,100	207,718	40%	57,465
2030	206,080	**208,457**	**185,434**	**139,100**	**87,300**	210,035	42%	58,902
2031	208,141	208,457	185,434	139,100	87,300	212,400	42%	60,374
2032	210,223	208,457	185,434	139,100	87,300	214,816	42%	61,884
2033	212,325	208,457	185,434	139,100	87,300	217,283	42%	63,431
2034	214,448	208,457	185,434	139,100	87,300	219,802	42%	65,017
2035	216,593	**217,619**	**183,477**	**144,000**	91,600	222,375	42%	66,642
2036	218,759	217,619	183,477	144,000	91,600	225,003	42%	68,308
2037	220,946	217,619	183,477	144,000	91,600	227,686	42%	70,016
2038	223,156	217,619	183,477	144,000	91,600	230,427	42%	71,766
2039	225,387	217,619	183,477	144,000	91,600	233,226	42%	73,560
2040	227,641	**225,419**	**179,456**	**149,300**	96,200	236,086	43%	75,399
2041	229,917	225,419	179,456	149,300	96,200	239,006	43%	77,284
2042	232,217	225,419	179,456	149,300	96,200	241,989	43%	79,216
2043	234,539	225,419	179,456	149,300	96,200	245,036	43%	81,197
2044	236,884	225,419	179,456	149,300	96,200	248,149	43%	83,227
2045	239,253	225,419	179,456	**154,900**	96,200	251,329	43%	85,307
2046	241,646	225,419	179,456	154,900	96,200	254,577	43%	87,440
2047	244,062	225,419	179,456	154,900	96,200	257,895	43%	89,626
2048	246,503	225,419	179,456	154,900	96,200	261,285	43%	91,867



	EDH	Cam.Pk	Pl'vill	Lk.Tahoe	Uninc.	Total
1980	17,162	8,010	4,740	9,425	46,474	85,812
1990	26,459	11,761	6,960	13,839	66,976	125,995
	2.50%	1.50%	1.30%	1.60%	0.03%	
Market Share >	25%	9.3%	5.5%	11.0%	base 2022	
2010	46,085	16,896	10,000	19,882	88,152	181,014
2011	46,085	16,896	10,000	19,882	88,152	181,014
2012	46,085	16,896	10,000	19,882	88,152	181,014
2013	46,085	16,896	10,000	19,882	88,152	181,014
2014	46,085	16,896	10,000	19,882	88,152	181,014
2015	46,085	16,896	10,000	19,882	88,152	181,014
2016	46,930	17,206	10,183	20,247	89,769	184,335
2017	46,930	17,206	10,183	20,247	89,769	184,335
2018	48,116	17,6[illegible]	10,440	20,758	92,037	188,993
2019	48,116	17,641	10,440	20,758	92,037	188,993
2020	48,775	17,882	10,583	21,043	93,298	191,581
2021	48,775	17,882	10,583	21,043	93,298	191,581
2022	49,082	17,995	10,650	21,175	93,885	191,581
2023	50,309	18,265	10,788	21,514	93,913	194,789
2024	51,567	18,539	10,929	21,858	93,941	196,834
2025	52,856	18,817	11,071	22,208	93,970	198,921
2026	54,177	19,099	11,215	22,363	93,998	201,052
2027	55,532	19,386	11,360	22,924	94,026	203,228
2028	56,920	19,677	11,508	23,291	94,054	205,450
2029	58,343	19,972	11,658	23,664	94,082	207,718
2030	59,802	20,271	11,809	24,042	94,111	210,035
2031	61,297	20,575	11,963	24,427	94,139	212,400
2032	62,829	20,884	12,118	24,818	94,167	214,816
2033	64,400	21,197	12,276	25,215	94,195	217,283
2034	66,010	21,515	12,435	25,618	94,224	219,802
2035	67,660	21,838	12,597	26,028	94,252	222,375
2036	69,352	22,165	12,761	26,444	94,280	225,003
2037	71,085	22,498	12,927	26,868	94,308	227,686
2038	72,863	22,835	13,095	27,297	94,337	230,427
2039	74,684	23,178	13,265	27,734	94,365	233,226
2040	76,551	23,526	13,438	28,178	94,393	236,086
2041	78,465	23,878	13,612	28,629	94,422	239,006
2042	80,427	24,237	13,789	29,087	94,450	241,989
2043	82,437	24,600	13,968	29,552	94,478	245,036
2044	84,498	24,969	14,150	30,025	94,507	248,149
2045	86,611	25,344	14,334	30,506	94,535	251,329
2046	88,776	25,724	14,520	30,994	94,563	254,577
2047	90,995	26,110	14,709	31,490	94,592	257,895
2048	93,270	26,501	14,900	31,993	94,620	261,285



	Yr 2022	
Lake Tahoe	21,175	11%
EDH	49,082	25%
Unicorp	192,787	100%
ED.County	192,787	100%
P'Ville	10,650	6%
Cam.Pk	17,995	9%



24-1388 Public Comment
PC Rcvd 08-07-24

DEMAND TABLES

		2020/25	2025/30	2030/35	2035/40	2040/45	
Population (eScal)	181,014	191,581	199,521	208,457	217,819	225,419	< Miscellaneous projections found
/yr 2013		38,380	39,030	39,640	40,270	40,930	< Miscellaneous projections found
TOTAL WATER DEMAND	38,984	39,500	42,937	49,560	57,870	67,295	< Miscellaneous projections found
UWMP 2020- Total Expected connections EID -Area		**42,935**	**46,948**	**49,111**	**50,944**	**53,073**	< Miscellaneous projections found

Table 2-1 page 2-3 & T2-4 pg 2-13

BAE Study | Connections | 23,358 | Table 2-1 page 2-3 & T2-4 pg 2-13

EDI 2021 Table 1-2+3 & Impact analysis table 3.12.13: 2024

Urban Water Master Plan 2020	35,910	38,908	39,770	40,920	42,130	43,330
	(3,074)	4,754	5,961	7,226	8,551	9,856

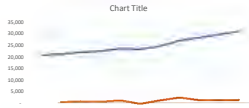
<T&Y: EDC- Impact analysis in EDHSP

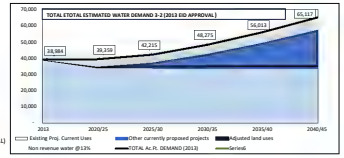
	Urban Water Master Plan 2020	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45	
Ac.Ft.	EDH Consumer use Potable Water	9,570	10,197	11,099	11,385	11,078	12,220						Table 4-1+3 & EID 2020 page 4-4
	Wrest + East service areas	9,544	10,675	10,743	11,472	10,635	7,850						
19%	**Total Retail Consumer use Potable Wat**	**19,114**	**20,872**	**21,842**	**22,857**	**21,713**	**20,070**	**22,110**	**23,010**	**23,910**	**24,880**	**25,820**	
	City Pvll+ndst+other+recycle	1,830	2,047	2,060	2,200	2,039	1,505	4,240	4,240	4,240	4,240	4,240	UWMP 2020 -pag 4-5& Table-11 Pg 4-18
17%	**Other+Ag.potb.+Loss**	10,919	11,923	12,477	13,057	12,403	11,465	12,630	12,520	12,770	13,010	13,260	
Ac.Ft.	**Total DISTRICT use Potable Water**	**31,863**	**34,842**	**36,379**	**38,114**	**36,156**	**33,040**	**38,980**	**39,770**	**40,920**	**42,130**	**43,320**	
	Municipal potable water	22,241	25,063	26,005	27,669	26,283	**Table 4-2+3**	22,110	23,010	23,910	24,880	25,820	
	Other+Ag.potb.+Loss							12,630	12,520	12,770	13,010	13,260	Table 4-11 forecast future use
	Total Potable Demand							34,740	35,530	36,680	37,890	39,080	
	Recycled							4,240	4,240	4,240	4,240	4,240	
	Total Water Demand							**38,980**	**39,770**	**40,920**	**42,130**	**43,320**	EID Table 4-11 -2021

(7,644)

Ac.Ft.	**UWMP-Forecast Water Use, Table 4-11 (Ac.Ft.**						
Ac.Ft.	Total Municipal (potable?)	21,220	23,010	23,910	24,880	25,820	Table 4-11 forecast future use
Ac.Ft.	Total EID New Customers	890	1,790	2,690	3,660	4,600	Table 4-11 forecast future use
Ac.Ft.	EDH New Customers	580	1,210	1,830	2,480	3,170	Table 4-11 forecast future use

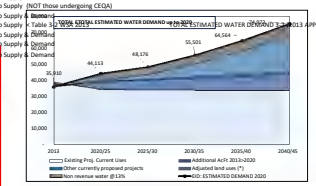
325851 gal / AF-Gallons / HH



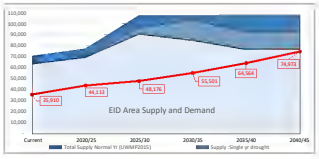


	Water Supply Asst Table 3-2(2013)	(UWMP - FINAL) ESTIMATED WATER DEMAND						
Output Table>	Table 3-1, pg 3-8	**2013**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**	
Output Table>	Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464	>To Supply & Demand
Output Table>	Other currently proposed projects	0	163	696	1,052	1,272	1,332	>To Supply & Demand
Output Table>	Adjusted land uses	0	514	2,853	7,975	14,718	22,830	>To Supply (NOT those undergoing CEQA)
Output Table>	Non revenue water @13%	0	4,528	4,857	5,554	6,444	7,491	>To Supply & Demand
Output Table>	**TOTAL Ac.Ft. DEMAND (2013)**	**38,984**	**39,359**	**42,215**	**48,275**	**56,013**	**65,117**	>To Supply > Table 3-2 WSA 2013
	Dif: UWMP 2020 (-) Demand 2013	(3,074)	4,754	5,961	7,226	8,551	9,856	>To Supply & Demand
Output Table>	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**	>To Supply & Demand
EDH Allocation fact	**EDH: ESTIMATED DEMAND 2020**	**10,313**	**12,669**	**13,836**	**15,940**	**18,543**	**21,532**	>To Supply & Demand

Appendix 1: Water Supply Asst Table 3-2 W2013



		2013	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**
Table for graph	Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464
Table for graph	Additional AcFt 2013>2020	(3,074)	4,754	5,961	7,226	8,551	9,856
Table for graph	Other currently proposed projects	-	163	696	1,052	1,272	1,332
Table for graph	Adjusted land uses (*)	-	514	2,853	7,975	14,718	22,830
Table for graph	Non revenue water @13%	-	4,528	4,857	5,554	6,444	7,491
Table for graph	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**



Memory calc. table	MEMORY CALC	Current	2020/25	2025/30	2030/35	2035/40	2040/45
Memory calc. table	Normal	70,800	70,800	70,800	70,300	78,300	78,300
Memory calc. table	Single yr drought	63,400	63,400	63,400	67,100	67,100	67,100
Memory calc. table	Five year drought	63,400	63,400	59,400	55,300	55,300	55,300
Memory calc. table		0.90	0.90	0.80	0.95	0.86	0.86
Memory calc. table		0.90	0.90	0.84	0.79	0.71	0.71
	Less EDC / SMUD Agt						
EIDF - UWMP 2015	**Total Supply Normal Year***	**70,800**	**77,490**	**107,690**	**107,690**	**108,190**	**108,190**

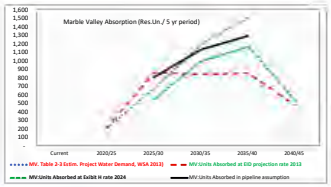
500

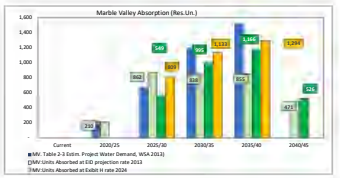
	* Public Services & Infrastructure - EID MSR & SOI Update FinalPage 7-16						
Table for graph		Current	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	**Total Supply Normal Yr (UWMP2015)**	**70,800**	**77,490**	**107,690**	**107,690**	**108,190**	**108,190**
Table for graph	Supply Single yr drought	63,400	69,391	96,434	102,788	92,715	92,715
Table for graph	Suppl : Five year drought	63,400	69,391	90,350	84,712	76,410	76,410
Table for graph	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**

MARBLE VALLEY AND LIME ROCK VALLEY DEVELOPER'S NUMBERS		**2013**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**
	Mar.Val.Existing (2013)	38,984	39,500	42,937	49,560	57,874	67,295
	Mar.Valy.Project		141	721	1,285	1,860	2,177
	Total Mvly	**38,984**	**39,359**	**42,216**	**48,275**	**56,014**	**65,118**
	Marble Valley : Presented Plan Meet 11th June						
	In AcFt	Current	2020/25	2025/30	2030/35	2035/40	2040/45
	Mar.Val.:Existing + Planned Future Proj	38,984	39,539	42,216	48,275	56,104	65,117
	Mar.Valy.Project SP		141	721	1,285	1,860	2,177
	Total Mvly	**38,984**	**39,680**	**42,937**	**49,560**	**57,964**	**67,294**
	Diference	-	57	(612)	(1,013)	(1,294)	(1,605)
	Lime Rock Valley : Presented Plan Meet 11th June						
		Current	2020/25	2025/30	2030/35	2035/40	2040/45
	Lime Rock: Existing + Planned Future Pro	38,984	39,482	42,828	49,288	57,402	66,722
	Lime Rock Valy.Project		18	109	272	472	573
	Total Lime Rock Valley SP	**38,984**	**39,680**	**42,937**	**49,560**	**57,964**	**67,294**

< Table 3-2 WSA 2013

(4,471)





		Current	2020/25	2025/30	2030/35	2035/40	2040/45	
	Mar.Valy.Project SP	141	721	1,285	1,860	2,177		
3236	**Total Mvly**	**141**	**580**	**564**	**575**	**317**	**2,177**	
Table for graph	**Table 3 - Marble Valley (residential un**	**Current**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**	**TOTAL**
Table for graph	MV. Table 2-3 Estim. Project Water Demand, WSA 2		222	669	1,192	1,510		3,593
Table for graph	MV:Units Absorbed at EID projection rate 2013		210	862	838	855	471	3,236
Table for graph	MV:Units Absorbed at Exibit H rate 2024			549	995	1,166	526	3,236
Table for graph	**MV:Units Absorbed in pipeline assumption**			**809**	**1,133**	**1,294**		**3,236**

	EDH CONNECTIONS Table 2-1a	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	EDH Connections	**20,463**	**20,931**	**21,673**	**22,190**	**23,358**	**23,103**	**24,281**	**26,736**	**28,002**	**29,313**	**30,720**
	EDH Connections / 5 yr period		**468**	**742**	**517**	**1,168**	**(255)**	**1,178**	**2,455**	**1,266**	**1,311**	**1,407**
	EDH new resid Connections	**(86% sfd + 14%MF**						**1,285**	**2,683**	**4,068**	**5,506**	**7,054**
	Expected New Resid Connections; T&Y-7	**Eastern Region**						**753**	**1,616**	**1,500**	**2,505**	**3,110**

Table 2-10 pg3-16
7,617 Table 2-4
Table 2-3

BAE Study Res Units
Table 2-3 EID2020 page -13

Tble 2-7Pg 2-15

	Total / Yr	549	995	1,166	526	AF/DU				AcFt					AcFt/DU	AcFt/EDU
AcFt/DU	**Marble Valley : Table 2-3 page 2-13 Exh**	**2,020**	**2,025**	**2,030**	**2,035**	Current	**2,025**	**2,030**	**2,035**	Current	**2,020**	**2,025**	**2,030**	**2,035**		
1.04	1 ac custom	25	45	145	193	1.16	1.04	1.04	1.04	29	47	151	201		1.04	289

EID Study	**Criteria***	AF - Year 2019	Citation
EID 2020	Potable Water Ac.Ft.	11,078	Table 4-1+3; page 4-4

RU4 - UPA	4.7

0.8	1/2 ac custom	25	50	50	125	0.87	0.80	0.80	0.80		22	40	40	100	0.80	144	
0.53	8000/10000 sf Lot	215	593	593	982	0.55	0.53	0.53	0.53		118	314	314	520	0.53	749	
0.48	5000/7000 sf lot	-	-	663	663	0.50	0.48	0.48	0.48					318	0.48	458	
0.38	Condo / Tomom	75	597	772	772	0.40	0.38	0.38	0.38		30	227	293	293	0.38	422	
0.16	Mult Family	209	259	487	501	0.16	0.16	0.16	0.16		33	41	78	80	0.16	115	
	Total Cum	549	1,544	2,710	3,236	1.31	0.83	0.69	0.67		232	669	1,195	1,313	0.47	2,177	
	Corner+Public+Other (ROW)																
		549	1,544	2,710	3,236	1.31	0.83	0.69	0.67	141	489	636	665	664			
										141	721	1,285	1,860	2,177			

PPHH	3.5
Peop/Ac	16.3
Increase for project area	2.71
W.Cons./per	150.0
Years / Prd	5.00
Gal / Ac	33,197.5
Gal / Acft.	325,851
Acft Factor/ Unit	0.509

Total Proposed project demand

Marble Valley : Presented Plan Meet 11th June

LONG TERM DEMAND bases on Acre Feet and connections	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Memory Calc Table > EDH Connections	20,463	20,931	21,673	22,190	23,358	23,103	24,281	26,736	28,002	29,313	30,720
Memory Calc Table > Total Retail Consumer use Potable Wate	19,114	20,872	21,842	22,857	21,713	20,070	22,110	23,010	23,910	24,880	25,820
Memory Calc Table > Total DISTRICT use Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320

		2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	Total Retail Consumer use Potable Water	19,114	20,872	21,842	22,857	21,713	20,070	22,110	23,010	23,910	24,880	25,820
Table for graph	Total DISTRICT use Potable Water	12,749	13,970	14,537	15,257	14,443	12,970	16,870	16,760	17,010	17,250	17,500
Table for graph	Total DISTRICT use Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320

	POPULATION	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2035/40	2040/45	2045/48
Table for graph	ED County Official Projections	184,627	186,027	188,793	190,925	193,057	191,245	196,079	206,080	216,593	227,641	239,253
Table for graph	Population: Dept of Finance (CA)	181,058	181,058	181,058	187,940	187,940	191,032	186,186	185,434	183,477	179,456	174,271
Table for graph	EID Area population	119,503	121,853	124,316	126,316	129,056	129,056	134,000	139,100	144,000	149,300	154,900
Table for graph	EID data for EDH population	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808

Memory Calc Table >	POPULATION	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2035/40	2040/45	2045/48
Memory Calc Table >	ED County Official Projections	184,627	186,027	188,793	190,925	193,057	191,245	196,079	206,080	216,593	227,641	239,253
Memory Calc Table >	ED County Official Projections	3,569	4,969	7,735	2,985	5,117	213	9,893	20,646	33,116	48,185	64,982
Memory Calc Table >	Population: Dept of Finance (CA)	61,555	59,205	56,742	61,624	58,884	61,976	52,186	46,334	39,477	30,156	19,371
Memory Calc Table >	EID Area population	51,774	52,752	52,761	53,537	52,857	53,707	54,900	51,800	52,400	53,100	55,092
Memory Calc Table >	**Derived EDH Pop. From County base**	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808

	RESIDENTIAL UNIT DEMAND BASED ON	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Occ/Un 3.5	**Derived EDH Pop. From County base**	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808
	Estimated Resid. Units EDH @3.5pphh	19,351	19,743	20,444	20,794	21,771	21,528	22,600	24,943	26,171	27,486	28,517 >>>>>
Table for graph	Pop Based: Res Units: 5 yr increment		392	701	350	977	(243)	1,072	2,343	1,229	1,314	1,031 >>>>

	RESIDENTIAL UNIT DEMAND BASED ON	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	EDH Res.Units. from County base : cumulative		392	1,093	1,443	2,420	2,177	3,249	5,592	6,820	8,135	9,166
Table for graph	EDH Res. Units in Pipeline: cumulative							5,756	3,818	5,345	6,108	6,108
	TOTAL EDH Res.Units in Pipeline: cumulative		**392**	**1,093**	**1,443**	**2,420**	**2,177**	**5,005**	**9,409**	**12,165**	**14,243**	**15,274**

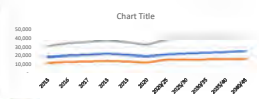
	DEMAND SUMMARY BY DIFFERENT METHODOLOGIES (BASE DATA FROM DIFFERENT SOURCES)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	UWMP 2020Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320
	EDH Connections	20,463	20,931	21,673	22,190	23,358	23,103	24,281	26,736	28,002	29,313	30,720
	Derived EDH Pop. From County base	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808
	EDC Housing Units -BAE Study 2023	54,929	54,929	54,929	54,929	55,605	55,605	57,352	57,352	59,151	61,015	62,957

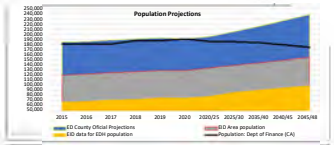
	GROWTH TENDENCIES (2015 BASE=1.00)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	ED County Official Projections	1.00	1.01	1.02	1.03	1.05	1.04	1.06	1.12	1.17	1.23	1.30
	Population: Dept of Finance (CA)	1.00	1.00	1.00	1.04	1.04	1.06	1.03	1.02	1.01	0.99	0.96
	EID Area population	1.00	1.02	1.04	1.06	1.08	1.08	1.12	1.16	1.20	1.25	1.30
	Derived EDH Pop. From County base	1.00	1.02	1.06	1.07	1.13	1.11	1.17	1.29	1.35	1.42	1.47

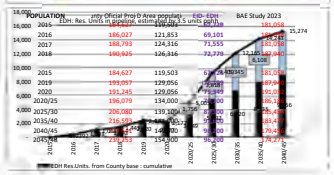
	GROWTH TENDENCIES (2015 BASE=1.00)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	UWMP 2020Potable Water	1.00	1.09	1.14	1.20	1.13	1.04	1.22	1.25	1.28	1.32	1.36
	EDH Connections	1.00	1.02	1.06	1.08	1.14	1.13	1.19	1.31	1.37	1.43	1.50
	EID data for EDH population	1.00	1.02	1.06	1.07	1.13	1.11	1.17	1.29	1.35	1.42	1.47
	EDC Housing Units -BAE Study 2023	1.00	1.00	1.00	1.00	1.01	1.01	1.04	1.04	1.08	1.11	1.15

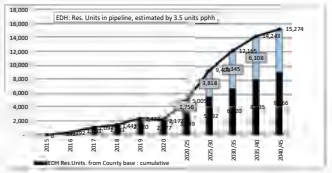
	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
UWMP 2020Potable Water	1.00	1.09	1.14	1.20	1.13	1.04	1.22	1.25	1.28	1.32	1.36
ED County Official Projections	1.00	1.01	1.02	1.03	1.05	1.04	1.06	1.12	1.17	1.23	1.30

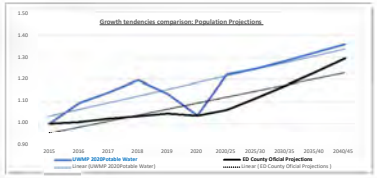
64,917

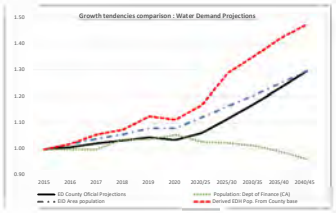


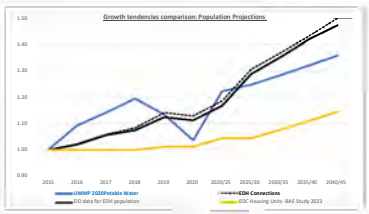




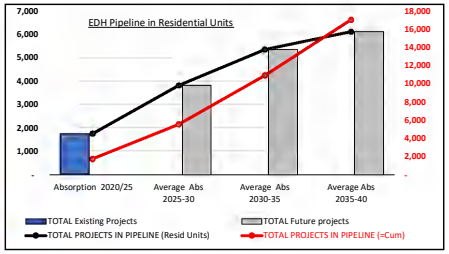








	EDH AREA FROM PIPELINE ANALYSIS	Absorption 2020/25	Average Abs 2025-30	Average Abs 2030-35	Average Abs 2035-40	
Res. Units>	TOTAL Existing Projects	1,756	-	-	-	
Res. Units>	TOTAL Future projects	-	3,818	5,345	6,108	
Res. Units>	**TOTAL PROJECTS IN PIPELINE (Resid Units)**	**1,756**	**3,818**	**5,345**	**6,108**	
Res. Units>	**TOTAL PROJECTS IN PIPELINE (=Cum)**	**1,756**	**5,574**	**10,918**	**17,026**	
	AGREGATE DEMAND in EDH AREA	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout
Res. Units>	PROJECTS IN PIPELINE (Resid Units)	1,756	3,818	5,345	6,108	-
Res. Units>	**Pipeline Cumulative**	**1,756**	**5,574**	**10,918**	**17,026**	**17,026**



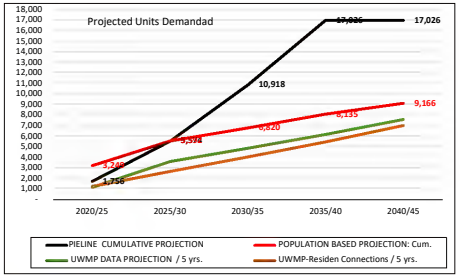
	POP.BASE. RESID.UNIT PROJECTION	2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	Population- Res Units: Annual increment	1,072	2,343	1,229	1,314	1,031
Res. Units>	Population: Cummulative units	3,249	5,592	6,820	8,135	9,166

	DEMAND EID AREA	Units PER 5 YR PERIOD: Estimated Absorption 2015/20	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Units Remaining 2040++	
Res. Units>	**EDH per 5 yr period**	**0**	**1,285**	**1,398**	**1,385**	**1,438**	**1,548**	Table 2-3 EID2020 page -13 (BAE Study)
Res. Units>	Eastern Region	500	753	563	584	605	605	
Res. Units>	Western Region	150	218	163	168	175	175	
Res. Units>	**TOTAL EID**	**650**	**2,256**	**2,124**	**2,137**	**2,218**	**2,328**	
Res. Units>	UWMP 2020	**Cummulative units - table 2-3 pg 2-13**						
Res. Units>	**EDH Aarea - CUMULATIVE**	**0**	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**	Table 2-3 EID2020 page -13 (BAE Study)
Res. Units>	Eastern Region	500	753	1,316	1,900	2,505	3,110	Table 2-7 EID2020 page -15 (BAE Study)
Res. Units>	Western Region	150	218	381	549	724	899	Table 2-8 EID2020 page -15 (BAE Study)
	TOTAL EID	650	**2,038**	**3,999**	**5,968**	**8,011**	**10,164**	

			3,818	5,345	6,108	-		
	Residential Units	2020/25	2025/30	2030/35	2035/40	2040/45		
Res. Units>	PIELINE CUMULATIVE PROJECTION	**1,756**	**5,574**	**10,918**	**17,026**	**17,026**		
Res. Units>	PIPELINE per 5 year period	1,756	3,818	5,345	6,108	-		
Res. Units>	POPULATION BASED PROJECTION: Cum.	**3,249**	**5,592**	**6,820**	**8,135**	**9,166**		
Res. Units>	POPULATION BASED PROJECTION / 5 yrs.	1,072	2,343	1,229	1,314	1,031		
Res. Units>	UWMP DATA PROJECTION - Cum.	**1,178**	**3,633**	**4,899**	**6,210**	**7,617**	Table 2-3 Pag 2-13	Table 2-4
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	2,455	1,266	1,311	1,407	Table 2-3 Pag 2-13	Table 2-4
Res. Units>	**UWMP-Residen Connections cum.**	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**	table 2-3 pg 2-13	
Res. Units>	UWMP-Residen Connections / 5 yrs.	1,285	1,398	1,385	1,438	1,548	table 2-3 pg 2-13	

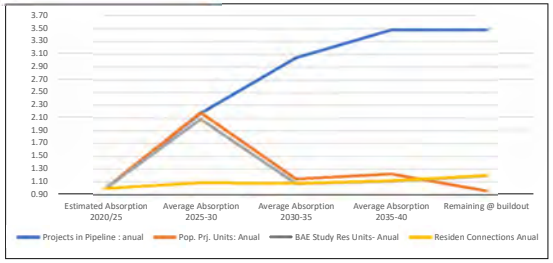
		2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	**PIPELINE per 5 year period**	1,756	3,818	5,345	6,108	-
Res. Units>	POPULATION BASED PROJECTION / 5 yrs.	1,072	2,343	1,229	1,314	1,031
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	2,455	1,266	1,311	1,407
Res. Units>	UWMP-Residen Connections / 5 yrs.	1,285	1,398	1,385	1,438	1,548

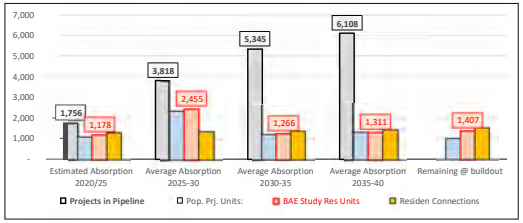
	PROJECTIONS : Cumulative	2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	PIELINE CUMULATIVE PROJECTION	1,756	5,574	10,918	17,026	17,026
Res. Units>	POPULATION BASED PROJECTION: Cum.	3,249	5,592	6,820	8,135	9,166
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	3,633	4,899	6,210	7,617
Res. Units>	UWMP-Residen Connections / 5 yrs.	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**



	EDH- ESTIMATED DEMAND per 5 yr. period by different methodologies	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout	TOTAL	
Res. Units>	Projects in Pipeline	1,756	3,818	5,345	6,108		**17,026**	17,026
Res. Units>	Pop. Prj. Units:	1,072	2,343	1,229	1,314	1,031	**6,988**	9,409
Res. Units>	BAE Study Res Units	1,178	2,455	1,266	1,311	1,407	**7,617**	10,038
Res. Units>	Residen Connections	1,285	1,398	1,385	1,438	1,548	**7,054**	9,972

Base in	EDH- ESTIMATED 5 YR. DEMAND by different methodologies BASE:2020	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout
Res. Units>	Projects in Pipeline : anual	1.00	2.17	3.04	3.48	3.48
Res. Units>	Pop. Prj. Units: Anual	1.00	2.19	1.15	1.23	0.96
Res. Units>	BAE Study Res Units- Anual	1.00	2.08	1.07	1.11	1.19
Res. Units>	Residen Connections Anual	1.00	1.09	1.08	1.12	1.20





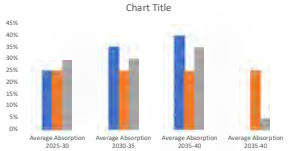
					50%	< % of total REMAINING						
Carson Creek SP		1,700	1,160	540	200	340					340	68%	EDH-SP Ap 2021- Table 5-1 GP-2024
Valley View SP		2,840	2,139	701	200	501					501	75%	
Project		Total Units Entitled	Built	EDH: Current Inventory	Additional units sold 2020-2025	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption to Buildout	TOTAL	% Remaining	
EDH-SP (Serrano)		6,162	4,614	1,548	774	774					774	75%	
Saratoga Estates		317	317	-	-	-					-	100%	
El Dorado Town Center		214	-	214	107	107					107	0%	EDH-SP Ap 2021- Table 5-1 GP-2024
Promontory SP		1,100	709	391	196	196					196	64%	
Bass Lake SP		1,458	99	1,359	680	680					680	7%	
TOTAL Existing Projects		**9,251**	5,739	3,512	**1,756**	**1,756**	-	-	-		1,756	**71%**	
							25%	35%	40%	0%	100%	0%	

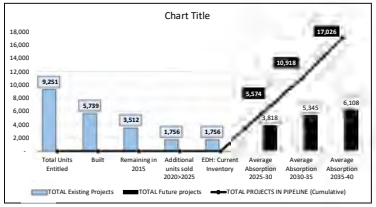
	Acres	Project name	Large SFD	SFD	MF	Other	Total Units	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	TOTAL	
1	**638**	East Ridge/ Valley View SP	701				701		175	245	280	-	**701**	
2	**2,342**	**Village of Marble Valley (SP)**	**1,963**	**1,209**		**64**	**3236**		**809**	**1,133**	**1,294**	**-**	**3,236**	
3	**740**	**Lime Rock Valley SP**	**550**		**250**		**800**		**200**	**280**	**320**	**-**	**800**	
4	**208**	Creekside Village- SP		668	250		**918**		230	321	367	-	**918**	
5	**43**	EDH 52 - Mixed Use Center			304		**304**		76	106	122	-	**304**	
6	**1,416**	Health and Independence SP		3,481	108	921	**4510**		1,128	1,579	1,804	-	**4,510**	
7	**208**	Town & Country Village SP				918	**918**		230	321	367	-	**918**	
8	**98**	Carson Creek SP		311	315	124	**750**		188	263	300	-	**750**	EDH-SP Ap 2021- Table 5-1 GP-2024 (CHECK w.County)
9	**116**	Town Center West (total 2340 Ac)			940		**940**		235	329	376	-	**940**	EDH-SP Ap 2021- Table 5-1 GP-2024(CHECK w.County)
10	**14**	Monsanto Manor			320		**320**		80	112	128	-	**320**	
11	**280**	Generations at Green Valley		165	214	60	**439**		110	154	176	-	**439**	
12	**104**	Cameron Meadows		161			**161**		40	56	64	-	**161**	
13	**143**	Dorado Oaks TM Subdiv		156	225		**381**		95	133	152	-	**381**	
14	**25**	Green Valley Road	54				**54**		14	19	22	-	**54**	
15	**8**	Serrano Village M5	20				**20**		5	7	8	-	**20**	
16	**5**	Bass Lake Fly Apts			124	2	**126**		32	44	50	-	**126**	
17	**40**	EDH - Golf Course (estimate remaining)					**500**		125	175	200	-	**500**	
18	**5**	Country Club Apts			192		**192**		48	67	77	-	**192**	
19	**6,434**	**TOTAL Future projects**	**3,288**	**6,151**	**3,242**	**2,089**	**15,270**	-	**3,818**	**5,345**	**6,108**	**-**	**15,270**	
	1614	Texas Hill Reservoir												< Is there an estimate of Res.Un.?
	?	Heritage at Carson Creek												< Is this an active project? There is a map proposed.
		PROJECTS IN PIPELINE	3,288	15,402	8,981	5,601	18,782	1,756	3,818	5,345	6,108		17,026	

NOTE THE FORGOING TABLE IS BACKED UB BY A SEPARATE DOCUMENT DETAILING THE INFORMATION FROM THE COUNTY'S WEBSITE AND IS AVAILABLE UPON REQUEST

		Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020-2025	EDH: Current Inventory	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	"PIPELINE" TOTAL RES. UNITS
		TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**	-	-	-	**1,756**
		TOTAL Future projects						3,818	5,345	6,108	15,270
		TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**	**3,818**	**5,345**	**6,108**	**17,026**
		TOTAL PROJECTS IN PIPELINE (Cumulative)						**5,574**	**10,918**	**17,026**	

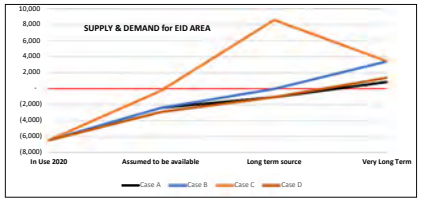
	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	
Case A	25%	35%	40%	0%	100%
Case B	25%	25%	25%	25%	
Case D	30%	30%	35%	5%	100%





Determining Acre Feet demanded based on existing residential units in pipeline				
EDH AREA PIPELINE ANALYSIS in ac.ft.	In Use	Assumed to be available	Long term source	Very Long Term
DEMAND: EDH AREA	1,756	3,818	5,345	6,108
DEMAND: EDH AREA Cumulative	1,756	5,574	10,918	17,026
EDH AREA PIPELINE ANALYSIS in ac.ft.	In Use	Assumed to be available	Long term source	Very Long Term
EDH: ESTIMATED DEMAND 2020	12,669	13,836	15,940	18,543
0.673 EDH PIPELINE (cumulative)	1,181	3,750	7,345	11,454
TOTAL: EID Current + EDH Demand	**13,851**	**17,586**	**23,285**	**29,997**

420	<GPD / HH
120	Usage: Galons / day
1825	Days in 5 Years
219,000	Total Galons in 5 Yrs
325,851	Galons in an Ac.Ft.
0.67	Acre feet / unit/5yr

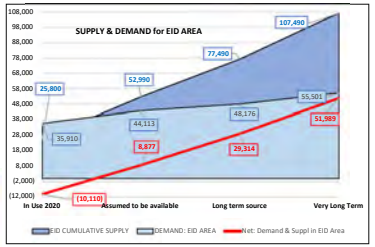


EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	67,190
Sub Total Planned	-		7,500	30,000	37,500
Recycled water	2,800	-	-	-	2,800
TOTAL Acre Feet	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**
CUMULATIVE SUPPLY	**25,800**	**52,990**	**77,490**	**107,490**	
EDH Alocation factor (base 2019) 28.7%					
EDH CUMULATIVE SUPPLY	**7,410**	**15,219**	**22,255**	**30,871**	

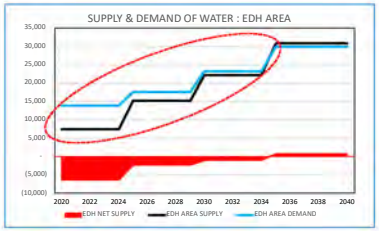
	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Allocation	Average Allocation	Average Allocation	Average Allocation	Acre Brought forward Assumed available 2035-39
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	(3)	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to be	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**

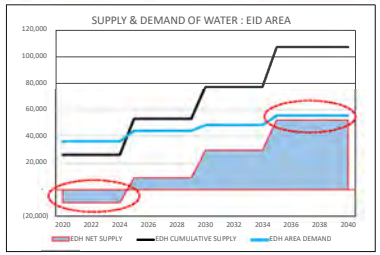
SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



	EDH AREA SUPPLY	EDH AREA DEMAND	EDH NET SUPPLY
2020	7,410	13,851	(6,441)
2021	7,410	13,851	(6,441)
2022	7,410	13,851	(6,441)
2023	7,410	13,851	(6,441)
2024	7,410	13,851	(6,441)
2025	15,219	17,586	(2,367)
2026	15,219	17,586	(2,367)
2027	15,219	17,586	(2,367)
2028	15,219	17,586	(2,367)
2029	15,219	17,586	(2,367)
2030	22,255	23,285	(1,030)
2031	22,255	23,285	(1,030)
2032	22,255	23,285	(1,030)
2033	22,255	23,285	(1,030)
2034	22,255	23,285	(1,030)
2035	30,871	29,997	874
2036	30,871	29,997	874
2037	30,871	29,997	874
2038	30,871	29,997	874
2039	30,871	29,997	874
2040	30,871	29,997	874



	EDH CUMULATIVE SUPPLY	EDH AREA DEMAND	EDH NET SUPPLY
2020	25,800	35,910	(10,110)
2021	25,800	35,910	(10,110)
2022	25,800	35,910	(10,110)
2023	25,800	35,910	(10,110)
2024	25,800	35,910	(10,110)
2025	52,990	44,113	8,877
2026	52,990	44,113	8,877
2027	52,990	44,113	8,877
2028	52,990	44,113	8,877
2029	52,990	44,113	8,877
2030	77,490	48,176	29,314
2031	77,490	48,176	29,314
2032	77,490	48,176	29,314
2033	77,490	48,176	29,314
2034	77,490	48,176	29,314
2035	107,490	55,501	51,989
2036	107,490	55,501	51,989
2037	107,490	55,501	51,989
2038	107,490	55,501	51,989
2039	107,490	55,501	51,989
2040	107,490	55,501	51,989



UWMO- Chapter 4 Page 4-6	EDH		UWMO- Chapter 4 Page 4-12	Tota EID
Single Family	4,574	31.8%	Single Family	14,400
SF-Attached	918	109.3%	SF-Attached	840
Multi Family	655	43.1%	Multi Family	1,520
Sub Total Residential area	**6,147**	36.7%	**Sub Total Residential ar**	**16,760**
Commer / Indust	755	53.5%	Commer / Indust	1,410
Landscapeing	780	85.7%	Landscapeing	910
Rece. Turf	617	62.3%	Rece. Turf	990
Sub Total ommer +Ldsc+Tf	**2,152**	65.0%	**Sub Total ommer +Ldsc+**	**3,310**
Land Development	**8,299**	41.4%	**Land Development**	**20,070**
Ag Metered Irrigation	29	0.9%	Ag Metered Irrigation	3,300
Small Farm	132	11.0%	Small Farm	1,200
Sub Total Ag	**161**	3.6%	**Sub Total Ag**	**4,500**
City Placerville			City Placerville	1,200
Ditch Service - potable			Ditch Service - potable	
Other Authorized Use			Other Authorized Use	
Recycled Supplement			Recycled Supplement	
Sub Total P'ville + other	-		Sub Total P'ville + other	**1,200**
Total Usage 2019	**8,460**	32.8%	**Total Usage 2019**	**25,770**

Customer usage for 2019 in Ac.Ft.

	Tota EID		EDH	Other + P'ville	Est+West+otr	Supply ?	Excess AF (table 4-6 page 4-8)
Single Family	12,587	47.9%	7517		5,070		
SF-Attached	824	3.1%	824		-		
Multi Family	1,273	4.8%	585		688		
Sub Total Residential area	**14,684**	**55.9%**	8,926		**5,758**		
Commer / Indust	1,616	6.1%	763		853		
Landscapeing	776	3.0%	680		96		
Rece. Turf	833	3.2%	572		261		
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	**2,015**		**1,210**		
Land Development	**17,909**	**68.1%**	**10,941**		**6,968**	30,014	12,105
Ag Metered Irrigation	2,735	10.4%	26		2,709		
Small Farm	1,068	4.1%	111		957		
Sub Total Ag	**3,803**	**14.5%**	137		3,666	5,059	1,256
City Placerville	1,000	3.8%		1,000		1,148	148
Ditch Service - potable	395	1.5%		395			
Other Authorized Use	2,564	9.8%		2,564			
Recycled Supplement	612	2.3%		612			
Sub Total P'ville + other	4,571	17.4%		4,571	-	1,148	(3,423)
Total Usage 2019	**26,283**	100.0%	**11,078**	**4,571**	**10,634**	**36,221**	**9,938**
			42.1%	17.4%	40.5%		

EDH	**11,078**	42.1%
West	5,388	20.5%
East	5,246	20.0%
Others*	4,571	17.4%
TOTAL	**26,283**	100.0%
SUPPLY - Sly Park Only	23,000	87.5%

	Tota EID		EDH	Other + P'ville	Est+West+otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	**14,684**	**55.9%**	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	2,015	-	1,210
Sub Total Ag	**3,803**	14.5%	137	-	3,666
Sub Total P'ville + other	**4,571**	17.4%	-	4,571	-
Total Usage 2019	**26,283**	**100.0%**	**11,078**	**4,571**	**10,634**

	TOTAL	42.1%	EDH % of Cou	West	East
Sub Total Residential area	14,684	55.9%	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	3,225	12.3%	2,015	-	1,210
EDH : Resid + Commercial	**17,909**	**68.1%**	**10,941**	-	**6,968**
EDH Alocation factor (base 2019)		**28.7%**	**< EDH Factor**		

	Normal	single dry	yr 2	yr 3
2020	42,938.0	45,084.0	41,928.0	38,321.0
	0%	5%	-2%	-11%
2025	49,561.0	52,039.0	48,396.0	44,233.0
	0%	5%	-2%	-11%

SUPPLY TABLES

	Distr Normal yr	Normal year	Water Supply Realibility - 2020 In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	2020 Urban Water Plan
Lic#11835/6	***30%***	**23,000**	**23,000**	**-**	**-**	**-**	**23,000**	**23,000**
Warren Act Contract	***6%***	4,560	-	4,560	-	-	4,560	4,560
American River Diversion	***19%***	15,080	-	15,080	-	-	15,080	15,080
Permit 21112	***22%***	17,000	-	-	17,000	-	17,000	17,000
CPV Contract	***10%***	7,550	-	7,550		-	7,550	7,550
Outingdale / Cosumnes (110)	***0%***	-		-			-	
Sub Total Existing Contracts	***87%***	**67,190**	**23,000**	**27,190**	**17,000**	**-**	**67,190**	**67,190**
Fazio Water 1990	***10%***	7,500	-		7,500		7,500	7,500
El Dorado - SMUD Coop Agt	***0%***					30,000	30,000	
Sub Total Planned	***10%***	**7,500**	**-**	**-**	**7,500**	**30,000**	**37,500**	**7,500**
Recycled water	***4%***	2,800	2,800				2,800	2,800
TOTAL Acre Feet	***100%***	**77,490**	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**	**77,490**
			25,800	52,990	77,490	107,490	-	

	Distr Normal yr	Normal year	In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	2020 Urban Water Plan
Sub Total Existing Contracts	*87%*	67,190	23,000	27,190	17,000	-	67,190	67,190
Sub Total Planned	*10%*	7,500	-	-	7,500	30,000	37,500	7,500
Recycled water	*4%*	2,800	2,800	-	-	-	2,800	2,800
TOTAL Acre Feet	***100%***	**77,490**	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**	**77,490**
		Cum>	25,800	52,990	77,490	107,490	**> TO Sup& Dmd Table>**	

		Max		Normal		Single Dry
-	Sly Park Resevoir	33,400	10,400	**23,000**	(2,080)	20,920
-	Weber Resevoir rights	4,560	-	**4,560**	(1,560)	3,000
-	Project 184 (1914Forbay)	15,080	-	**15,080**	-	15,080
-	Permit 2112 (Warren Act)	17,000	-	**17,000**	-	17,000
-	CVP Contract- Fazio	7,550	-	**7,550**	(3,775)	3,775
(110)	Outingdale / Cosumnes	-	(110)	**110**	(6)	104
(110)	-	**77,590**	**10,290**	**67,300**	**(7,421)**	**59,879**
	Recycled	3,500	-	**3,500**		

In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	% Distrib x source	Dry Year	WATER SUPPLY REALIBILITY from 2020 UWMP DRAFT 2021
	4,560			**4,560**	*6%*	*3,000*	1. **Ditches / Weber Reservoir Rights (License 2184 and Pre-1914 Water Rights)** are appropriative 4,560 acre-feet has historically been available in average years and is assumed to be available in future average years.
23,000				**23,000**	*31%*	*20,920*	2. **Sly Park Reservoir (License 11835 and 11836 and pre-1914 Camp Creek right)**, **, is the District's only existing supply source whose value during average years is** less than the maximum water right. Although the rights allow up to 33,400 acre-feet, and the District has diverted as much as 25,745 acre-feet, 23,000 acre-feet is used for planning purposes for an average year due to the need to set aside carryover storage for future years.
		7,550		**7,550**	*10%*	*3,775*	3. **Central Valley Project water (Contract 14-06-200-1375A-LTR1-P)** 7,550 acre-feet in average years and is assumed to be available in future average years.
	15,080			**15,080**	*20%*	*15,080*	4. **Project 184 (Pre-1914 appropriative rights from the Upper South Fork American River)** 15,080 acre-feet, to be fully available inaverage years
		17,000		**17,000**	*23%*	*17,000*	5. **Permit 21112** allows the District to divert up to 17,000 acre-feet of water per year at Folsom Reservoir through a Warren Act Contract. This supply has not historically been available in its full amount pending the completion of a temperature control device at the District's intake from Folsom Reservoir, which is expected to be completed in 2021.
	104			**104**	*0%*	*104*	6. **Outingdale/ Middle Fork Cosumnes Supplies (Permit 4071)** provides up to 104 acre-feet per year of water during average years, and is expected to remain at this level in future average years.
							7. **Recycled Water** is projected to provide 3,500 acre-feet in average years. Note that this supply is **non-potable water.**
			7,500	**7,500**	*10%*	*7,500*	8. **Central Valley Project Fazio Water** is expected to include 7,500 acre-feet Once secured, projected to occur by 2035,
23,000	**19,744**	**24,550**	**7,500**	**74,794**	*100%*	*67,379*	**TOTAL SUPPLY**
31%	26%	33%	10%	100%		90%	

The conclusion that EID should have sufficient water available to meet the needs of the Proposed Project, in addition to the other demands in its service area through 2035, rests on the following set of assumptions: ! EID, EDCWA, and EDWPA successfully execute the contracts and obtain the water right permit approvals for currently unsecured water supplies discussed in Section 4. Absent these steps, the water supplies currently held by EID and recognized to be diverted under existing contracts and agreements would be insufficient in 2035 to meet the Proposed Project demands along with all other existing and planned future uses. ! EID will commit to implement Facility Capacity Charges in an amount sufficient to assure the financing is available as appropriate to construct the necessary infrastructure as detailed in the March 2013 EID Integrated Water Resources Master Plan. ! Demand in single-dry years includes an additional 5 percent of demand over the normal year demand during the same time period. This conservative assumption accounts for the likelihood that EID customers will irrigate earlier in the season to account for dry spring conditions. This hypothetical demand augmentation may or may not manifest in dry years, but this conservative assumption further tests the sufficiency of water supplies during dry conditions. ! The estimated demands include 13 percent to account for non-revenue water losses (e.g. distribution system losses). The finding of this WSA is that EID should have sufficient water to meet the demands of Proposed Project and its other service area demands for the next 20 years.

Average Year Water Supply Availability is based on the following assumptions: 2013 WSA

1. Ditches / Weber Reservoir Rights (License 2184 and Pre-1914 Water Rights) are appropriative water rights associated with Slab, Hangtown, Mill, and Weber Creeks. **The maximum value of 4,560 acre-feet has historically been available in average years and is assumed to be available in future average years**
2. 2. Sly Park Reservoir (License 11835 and 11836 and pre-1914 Camp Creek right), also called **Jenkinson Lake, is the District's only existing supply source whose value during average years is less than the maximum water right.** Although the rights allow up to 33,400 acre-feet, and the District has diverted as much as 25,745 acre-feet, **23,000 acre-feet is used for planning purposes** for an average year due to the need to set aside carryover storage for future years.
3. 40 El Dorado Irrigation District 2020 Water Quality Report, Outingdale Water System 41 El Dorado Irrigation District 2020 Water Quality Report, Strawberry Water System 42 The El Dorado Irrigation District Integrated Water Resources Master Plan, March 31, 2013 Chapter 3 – Water Supply 2020 UWMP – Final 3-14 3.
4. Central Valley Project water (Contract 14-06-200-1375A-LTR1-P) has historically been available at its maximum value of 7,550 acre-feet in average years and is assumed to be available in future average years.
5. 4. Project 184 (Pre-1914 appropriative rights from the Upper South Fork American River) have an early priority date that has **allowed this source of water, 15,080 acre-feet, to be fully available in average years** and is assumed to be available in future average years. Supplies for the District's Strawberry system are included in this supply.
6. 5. Permit 21112 allows the District to divert up to 17,000 acre-feet of water per year at Folsom Reservoir through a Warren Act Contract. This supply has not historically been available in its full amount pending the completion of a temperature control device at the District's intake from Folsom Reservoir, **which is expected to be completed in 2021**. Based upon the availability of the supply in Permit 21112, the ability to store the water in Caples, Silver, and Lake Aloha, and the long-term Warren Act Contract with USBR, the average-year availability of this supply is 17,000 acre-feet.
7. 6. Outingdale/ Middle Fork Cosumnes Supplies (Permit 4071) provides up to 104 acre-feet per year of water during average years, and is expected to remain at this level in future average years.
8. 7. **Recycled Water is projected to provide 3,500 acre**-feet in average years. Note that this supply is non-potable, in contrast to the other District supplies presented in this section.
9. **8. Central Valley Project Fazio Water is expected to include 7,500 acre-feet o**r more as authorized by federal law. Once secured, projected to occur by 2035, the District is expected to receive its full entitlement in average years. While the District's existing supplies are sufficient to meet demands throughout all scenarios examined in the planning period based on current conditions and assumptions, securing the Fazio CVP Supply will further improve future reliability. The District's projected average year supplies are summarized in Table 3-2.

El Dorado Hills – Cameron Park Area Projects.

E.D.Co. Planning Department: "projects in your area" – 8 June 2024

Compiled by Alastair Dunn, for EDH - APAC

Please note that all the project information in this document was taken verbatem from the County's Website.

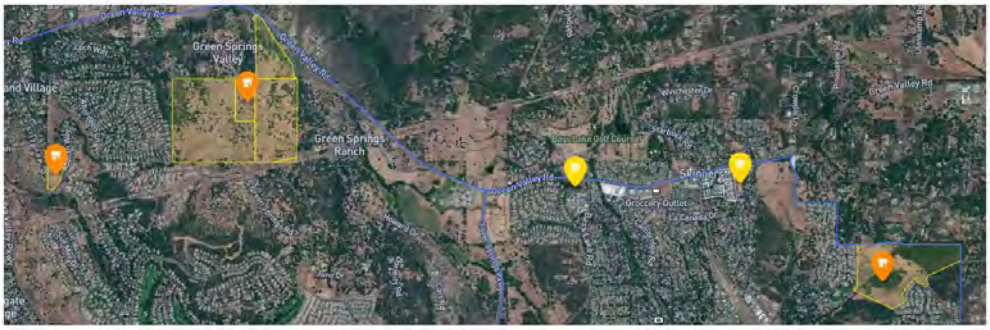
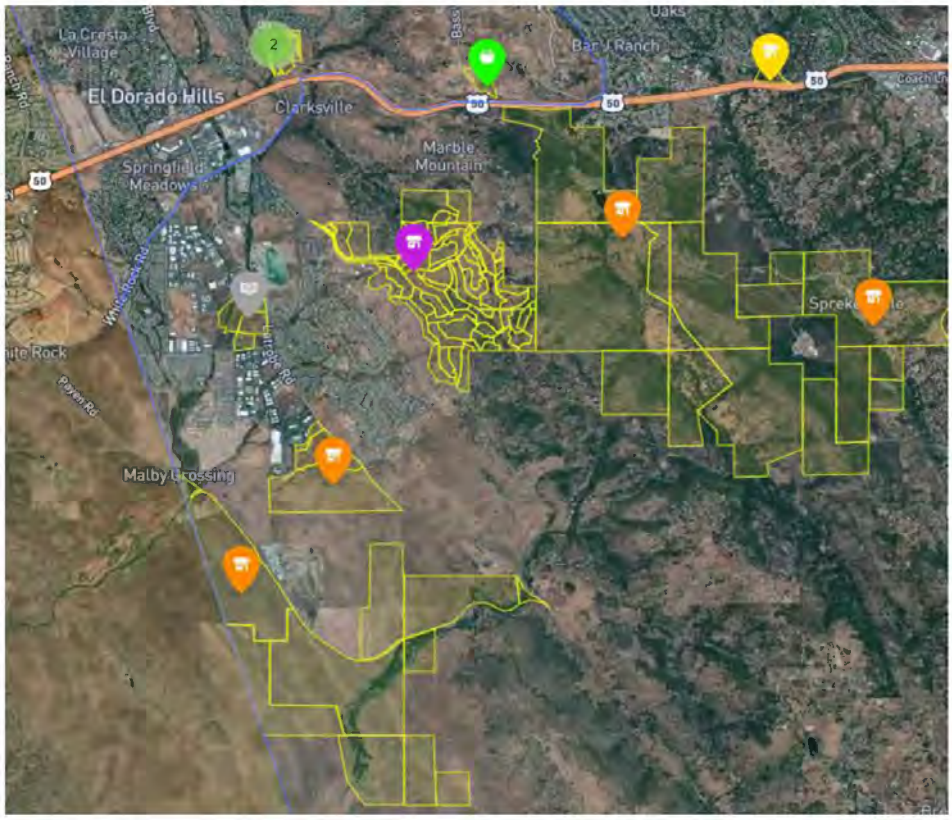


Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020>2025	EDH: Current Inventory
TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**
TOTAL Future projects					**15,270**
TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**17,026**
TOTAL PROJECTS IN PIPELINE (Cumulative)					



El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

EL DORADO HILLS AREA: CURRENT AND FUTURE RESIDENTIAL UNITS

Carson Creek SP	1,700	1,160	540	200	340
Valley View SP	2,840	2,139	701	200	501
Project	Total Units Entitled	Built	EDH: Current Inventory	Additional units sold 2020>2025	Estimated Absorption 2020/25
EDH-SP (Serrano)	6,162	4,614	1,548	774	774
Saratoga Estates	317	317	-	-	-
El Dorado Town Center	214	-	214	107	107
Promontory SP	1,100	709	391	196	196
Bass Lake SP	1,458	99	1,359	680	680
TOTAL Existing Projects	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**

Acres	Project name	SFD	MF	Other	Additional units sold 2020>2025	Total Units
638	East Ridge/ Valley View SP					**701**
2,342	**Village of Marble Valley (SP)**	**1,209**		**64**		**3236**
740	**Lime Rock Valley SP**		**250**			**800**
208	Creekside Village- SP	668	250			**918**
43	EDH 52 - Mixed Use Center		304			**304**
1,416	Health and Independence SP	3,481	108	921		**4510**
208	Town & Country Village SP			918		**918**
98	Carson Creek SP	311	315	124		**750**
116	Town Center West (total 2340 Ac)		940			**940**
14	Monsanto Manor		320			**320**
280	Generations at Green Valley	165	214	60		**439**
104	Cameron Meadows	161				**161**
143	Dorado Oaks TM Subdiv	156	225			**381**
25	Green Valley Road					**54**
8	Serrano Village M5					**20**
5	Bass Lake Fly Apts		124	2		**126**
40	EDH - Golf Course (estimate remaining)					**500**
5	Country Club Apts		192			**192**
6,434	**TOTAL Future projects**	**6,151**	**3,242**	**2,089**	**1,756**	**15,270**
1614	Texas Hill Reservoir					
?	Heritage at Carson Creek					
	PROJECTS IN PIPELINE	**6,151**	**3,242**	**2,089**	**1,756**	**17,026**

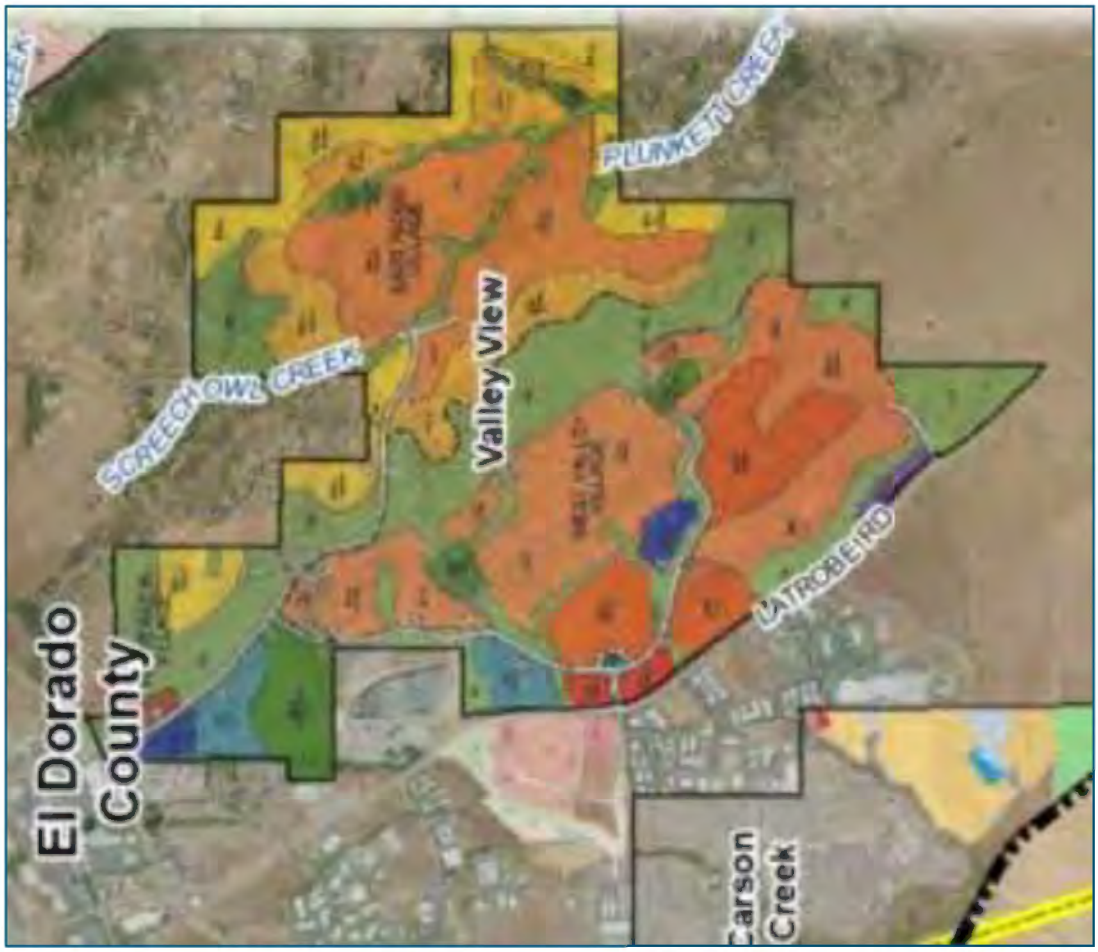
Note: This tabulation of projects assumes that as of 2020, about 1756 units remain to be sold.
This assumption IS NOT one made by the EDC Planning Department.
It is a crude estimate of the inventory to sell from approved and currently selling projects in the area.

To be clear, projects in the EDH area currently undergoing CEQA total to 15,270 residential units.
The total EDUs were not calculated due to the complexity of the proposed
and existing commercial zoning in the area.
However, for estimating total water needs, as a coarse rule of thumb to estimate the total EDUs for the area,
one should add at least 30% to the 15,270 units identified, or 19,851 EDUs

El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

East Ridge (Valley View)

On December 8, 1998, the Board adopted Ordinance No. 4517 approving the VVSP and certified the Environmental Impact Report (EIR) (State Clearing House No. 97082008) for the VVSP. The VVSP is a master planned community consisting of approximately 2,037 acres and including approximately 2,840 dwelling units. On that same date, the Board approved the 1998 VVSP Development Agreement (VVSP DA) (Exhibit H).
The East Ridge Village Tentative Subdivision Map (TM14-1521) (Exhibit E) would create approximately 759 lots consisting of 701 residential lots, 41 landscape lots, 12 roadway lots, 2 recreational park lots, a sewer lift station lot, a water tank lot, and a pump station lot
East Ridge Village is within the Valley View Specific Plan and has an approved Tentative Subdivision Map (TM14-1521), approved by the Planning Commission on June 11, 2015, that would create approximately 759 lots **consisting of 701 residential lots**, 41 landscape lots, 12 roadway lots, 2 recreational park lots, a sewer lift station lot, a water tank lot, and a pump station lot. The project has an approved and executed Development Agreement (DA22-0001) which was approved by the Board of Supervisors on July 25, 2023.



~~MARBLE VALLEY: Project Overview~~

Village of Marble Valley Specific Plan proposes for the development of 2,342 acres of land consisting of approximately **~~3,236 dwelling units and 475,000 square feet of commercial land~~**. The project is located in between El Dorado Hills and Cameron Park area south of Highway 50.

Land use	Parcels #	Zoning	Area (Ac)	Units	Gross Density
		*sq.ft.'000			
Village Resid. Low	1A+1B+1C+1D+1F	R15-PD	197.0	193	0.98
Village Resid. Low	1E	R10-PD	63.0	125	1.98
Village Resid. Low	2a+2b+2c+2d+2e+2f	R6-PD	305.0	1085	3.56
Village Resid. Low	2G	R4-PD	120.0	560	4.67
Village Resid. Low		**R4>15-PD**	**685.0**	**1963**	**2.87**
Medium Resid.	3a+3b+3c	RM1-PD	84.0	708	8.43
Medium Resid.	4a+4b+	RM2-PD	28.0	501	17.89
Medium Resid.			**112.0**	**1209**	**10.79**
TOTAL RESIDENTIAL			**797.0**	**3,172**	**3.98**
Office Park	4a+4b	C1-PD	41.0		9,146
Village Comm.	6b+6c+6d+6e	C2-PD	7.0		3,571
Village Comm.	6a	C1-PD	9.0	50	833
Commercial			**57.0**	**50**	7,149
AG.TOUR -Viyd	7a+b+c+d+e+f+g+h+i-	AT1-PD	55.0	14	0.25
TOTAL RESIDENTIAL PLANNED			**909.0**	**3,236**	
Public Schools	8a	RM2-PD	19.0		
Public Schools	8b	R4-PD	16.0	75	4.67
SCHOOLS			**35**	**75**	
VILLAGE PARK			47.0	261	40.5
Public Utilities	10a	R15-PD	5.0	5	0.98
PUBLIC UTILITY			**5.0**	**4.9**	0.98
PUBLIC FACILITIES			**87.0**	**340.2**	
Commu.Open Sp.	11-a (N.Deer Crk)	OS1-PD	743.0		
	11b-Hy 50 Scenc	OS1-PD	75.0		
Private Op.Sp.	11c- Foundation	OS2-PD	466.0		
TOTAL OPEN SPACE			**1,284.0**		
ROAD IMPACT AREA	**Right of Way**	**ROW**	**61.0**		
			2,341.0	**3,576.2**	

Table prepared by Alastair Dunn from Marble Valley grom the DEIR. The proponent sites 3236 units, to which an additional 340 units are added due to zoning request to total 3576 units.

Lime Rock Valley Specific Plan
APNs: 109-010-013, 109-010-014, 109-020-001, 109-020-004, 109-020-005, 109-020-006, 119-030-013

The County of El Dorado will host an open house to present a general overview and environmental information of both the Village of Marble Valley and Lime Rock Valley projects. The meeting will be held in-person on **Tuesday, June 11, 2024, from 5:30 p.m. to 7:30 p.m. in the Assembly Hall at the Cameron Park Community Services District Community Center,** 2502 Country Club Drive, Cameron Park, CA 95682. For more inforfmation please click here: Lime Rock Valley Specific Plan Notice of Availability of the DEIR - El Dorado County (ca.gov)(External link)

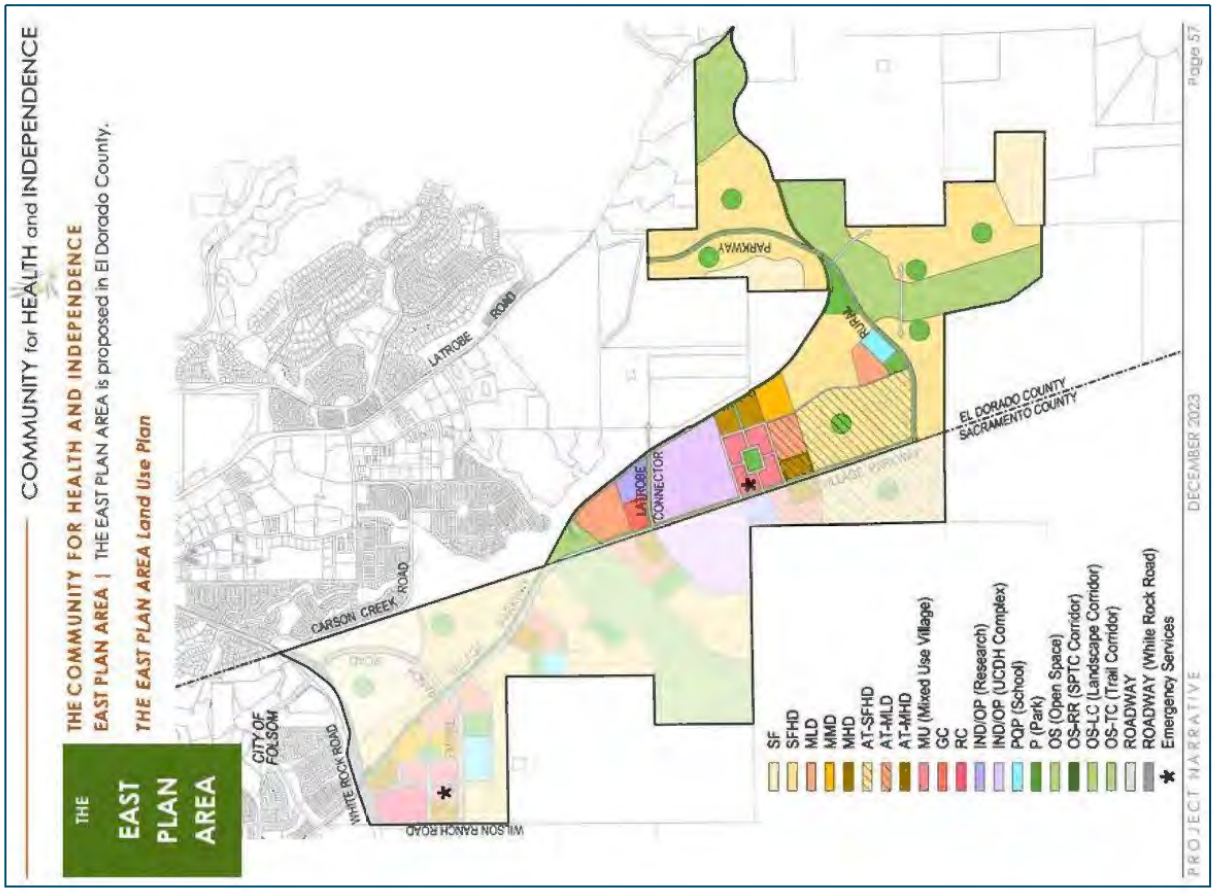
Land Use Designation		Zoning	Area (Ac)	% Plan Area	Units
Residential					
LRL	*Lime Rock Residential Low (0.2 - 5.0 Du/Ac)*				
	Parcels 15, 37, 40, 43, 46	RSA-PD	121	16%	22
		R2.5A-PD	11	2%	3
	Parcels 4, 31, 32	R1A-PD	34	5%	30
	Parcels 9, 10, 12, 33, 34	R15-PD	81	11%	180
	Parcels 19, 20, 21, 22, 23, 24, 35, 39, 41, 45	R10-PD	27	4%	84
	Parcels 1, 28, 29, 30	R6-PD	48	6%	231
LRM	*Lime RockResidential Medium (5.0 to 8.0 Du/Ac*				
	Parcel 7	R4-PD	36	5%	250
	Subtotal Residential		**358**	**49%**	**800**
Public Facilities					
VP	*Village Park*				
	Parcel 5	R15-PD	8	1%	
	Subtotal Public Facilities		**8**	**1%**	
Open Space					
OS	*Community Open Space*				
	Parcels 2, 3, 6, 8, 11, 13, 14, 27, 36, 38, 42, 44, 47	OS1-PD	211	29%	
OS	*Foundation or Private Open Space*				
	Parcel 14	OS2-PD	124	17%	
	Subtotal Open Space		**335**	**45%**	
Road Right-of-Way			**39**	**5%**	
Total			**740**	**100%**	**800**

Proposed development of 800 dwelling units, 15 acres of public facility/recreational park use, and 335 acres of open space on an approximately 740-acre site. The current zoning is Estate Residential Ten Acre-Planned Development (RE-10-PD), Residential Agricultural-20 and Residential Agricultural-40 Districts, and Open Space (OS). The current General Plan land use designation for the project site is Rural Residential (RR) and Open Space (OS). The project would require a general plan amendment to Adopted Plan-Lime Rock Valley Specific Plan (AP-LRVSP) and LRVSP land use designations Low Density Residential (LDR), Village Park (VP), and Open Space (OS) and a rezone to LRVSP zone districts One-Acre Lot Residential-Planned Development (R1A-PD), 15K SF Lot Residential-Planned Development (R15-PD), 10K SF Lot Residential-Planned Development (R10-PD), 6K SF Lot Residential-Planned Development (R6-PD), Private Open Space-Planned Development (OS1-PD), Public Open Space-Planned Development (OS2-PD), and Preserve-Open Space Planned Development (OS3-PD). The project would establish a Development Agreement and Specific Plan for Lime Rock Valley.

COMMUNITY HEALTH INDEPENDENCE

AKT Development and UC Davis Health submitted a proposal to both El Dorado County and the City of Folsom on Friday December 22, 2023 for a project described as a "Community for Health and Independence" that would provide a residential development for healthy senior communities, and residential housing for disabled residents. **The project proposes 4000 residential housing units in Sacramento County, and 4000 residential housing units in El Dorado Hills.**

Pre-Application for Community for Health and Independence Specific Plan
APNs: 117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021
Pre-Application and BOS Policy J-6 Conceptual Review for a General Plan Amendment request to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. Guided by UC Davis research, the project is designed to promote healthy living through project design and includes a 200-acre research complex. **The property consists of 8 parcels totaling approximately 1,460 acres and is located approximately** 3 miles south of State Highway 50, along the eastern County border with Sacramento County, in the El Dorado Hills area, Supervisorial District 1.



THE EAST PLAN AREA Land Use Summary Table

EAST PLAN AREA		
Land Use	**Gross Area (Acres)**	**Dwelling Units**
Residential		
SF (1-4du/ac) Single Family	105.3	295
SFHD (4-7du/ac) Single Family High Density	490.2	2157
MLD (7-12du/ac) Multi-Family Low Density	46.8	337
MMD (13-20du/ac) Multi-Family Medium Density	19.3	232
MHD (20-30du/ac) Multi-Family High Density	19.5	311
Subtotal Traditional Residential	***681.1***	***3,332***
Age-Targeted Residential		
AT-SFHD (4-7du/ac) Age-Targeted Single Family High Density	119.5	526
AT-MLD (7-12 du/ac) Age-Targeted Multi-Family Low Density	20.0	144
AT-MHD (20-30du/ac) Age-Targeted Multi-Family High Density	10.0	160
Subtotal Age-Targeted Residential	***149.5***	***830***
Mixed-Use		
MU (9-30du/ac & 0.5 FAR) Mixed-Use Village *(Assumes 25% Residential / 75% Commercial)*	32.0	144
Subtotal Mixed-Use	***32.0***	***144***
Commercial, Employment & Civic		
GC (0.5 FAR) General Commercial	10.0	
IND/OP Complex (1.0 FAR) Industrial/Office Park UCDH Complex	100.0	
IND/OP Research (0.5 FAR) Industrial/Office Park Research	15.0	
PQP (0.5 FAR) Public/Quasi-Public Public Schools	10.0	
Subtotal Commercial & Employment	***135.1***	
Parks & Open Space		
P Parks	53.4	
OS Open Space	306.6	
OS-RR Open Space Rail Road Parcels	4.5	
OS Open Space Landscape/Trail Corridor	51.4	
Subtotal Parks & Open Space	***416.0***	
Circulation		
Major Circulation	46.2	
Subtotal Circulation & Misc	***46.2***	
EAST PLAN AREA TOTAL	**1,459.9**	**4,306**

Land Use Designations and Park & Population Generation Factors are based on the El Dorado County General Plan.

THE WEST PLAN AREA Land Use Summary Table

WEST PLAN AREA		
Land Use	**Gross Area (Acres)**	**Dwelling Units**
Residential		
SF (1-4du/ac) Single Family	131.9	369
SFHD (4-7du/ac) Single Family High Density	379.3	1669
MLD (7-12du/ac) Multi-Family Low Density	66.9	481
MMD (13-20du/ac) Multi-Family Medium Density	25.9	311
MHD (20-30du/ac) Multi-Family High Density	40.7	651
Subtotal Traditional Residential	***644.7***	***3,481***
Age-Targeted Residential		
AT-SFHD (4-7du/ac) Age-Targeted Single Family High Density	136.3	600
AT-MLD (7-12 du/ac) Age-Targeted Multi-Family Low Density	22.4	161
AT-MHD (20-30du/ac) Age-Targeted Multi-Family High Density	10.0	160
Subtotal Age-Targeted Residential	***168.7***	***921***
Mixed-Use		
MU (9-30du/ac & 0.5 FAR) Mixed-Use Village *(Assumes 25% Residential /75% Commercial)*	24.1	108
Subtotal Mixed-Use Village Residential	***24.1***	***108***
Commercial, Employment & Civic		
RC (0.5 FAR) Regional Commercial Lifestyle Center	30.1	
IND/OP Complex (1.0 FAR) Industrial/Office Park UCDH Complex	100.0	
IND/OP Research (0.5 FAR) Industrial/Office Park Research	15.0	
PQP (0.5 FAR) Public/Quasi-Public Public Schools	30.0	
Subtotal Commercial & Employment	***175.1***	
Parks & Open Space		
P Parks	56.6	
OS Open Space	233.2	
OS-RR Open Space Rail Road Parcels	13.0	
OS Open Space Landscape/Trail Corridor	36.8	
Subtotal Parks & Open Space	***339.6***	
Circulation		
Major Circulation	41.8	
SEC R.O.W. (White Rock Road)	22.5	
Subtotal Circulation & Misc	***64.2***	
WEST PLAN AREA TOTAL	**1,416.32**	**4,511**

Land Use Designations and Park & Population Generation Factors are based on the Folsom Plan Area Specific Plan.

Creekside (Winn Communities)

APNs: 117-720-012 & 117-010-032

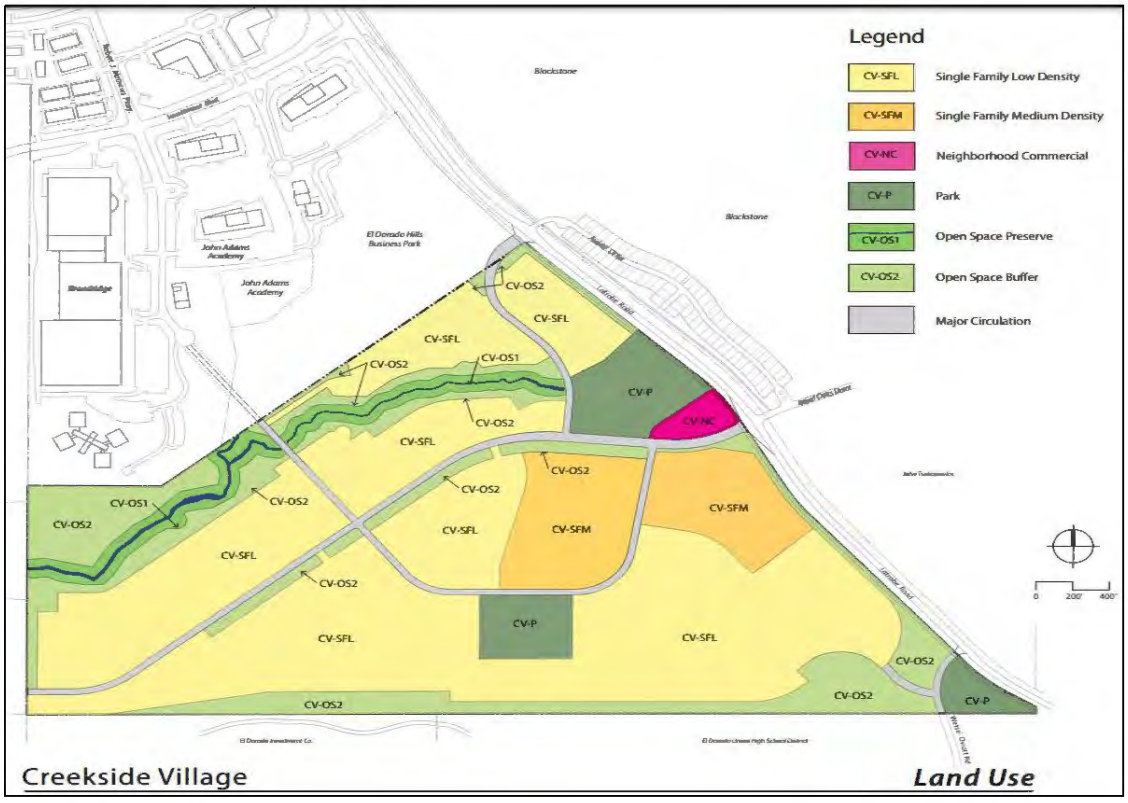
Proposed development of a new 918-unit residential community located on an approximately 208-acre site. The project would include **115.8 acres of approximately 668 Single-Family Low-Density** residential development, **20.8 acres of approximately 250 Single-Family Medium-Density residential development**, 1.8 acres of Neighborhood Commercial, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, and 10.4 acres of roadways. The proposed land use map is provided in the linked PDF. The current zoning and General Plan land use designation for the project site is Research & Development (R&D). The project would require a general plan amendment from R&D to AP - Adopted Plan, a rezone from R&D to SP - Creekside Village Specific Plan, a subdivision map, and establish a Development Agreement and Specific Plan for Creekside Village.

Creekside Village submitted by WINN COMMUNITIES for an Initiation Hearing (Conceptual Review) of a proposed new Specific Plan that would require amending the General Plan land use designation of a de-annexed portion of the El Dorado Hills Business Park from the current Research and Development to residential land uses to allow medium- and low-density single family residential development at a density of 5-24 units per acre with an expected **range of 700 to 900 dwelling units.** The property, identified by Assessor's Parcel Number 117-010-012, consisting of 208 acres, is located on the west side of Latrobe Road, approximately 1,600 feet south of the intersection with Investment Boulevard, within the El Dorado Hills Business Park, in the

El Dorado County Planning and Building Department issues Notice of Second Scoping meeting and early consultation with public for Draft EIR

The El Dorado County Planning Department has provided a Notice of a second Public Scoping Meeting for the proposed Creekside Village development located along Latrobe Road in El Dorado Hills. The first Public Scoping meeting was held virtually on November 19, 2020 regarding the proposed 208 acre site that would feature up to 918 units of low and medium density single family residential development. Following that November 2020 Scoping meeting, the County held a 30 day public comment period, with the expectation that the Draft Environmental Impact Report analysis would begin. However in October 2021 the applicants requested that the project application be placed on hold. Following this, Dermody Development sought to purchase the project site for the proposed Project Frontier 4-plus million square foot distribution center. With the withdrawal of the Project Frontier application, the property owner has engaged in discussions with multiple area Homeowners Associations to **gather feedback regarding their previous residential project**. Those discussions have led the property owner to reactivate their Creekside Village residential project.

The project applicant proposes to develop a 918-unit residential community located on an approximately 208-acre site. The Project remains consistent with the description in the Notice of Preparation with minor revisions, including the addition of an approximately 1.8-acre neighborhood commercial area in response to requests from the community to add a small neighborhood commercial component and the removal of 8 proposed units. The project would include 115.8 acres of single-family low-density residential development, 20.8 acres of single-family medium-density residential development, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, 1.8 acre of neighborhood commercial, and 11.1 acres of roadways.



El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

Carson Creek

This proposed Specific Plan would allow **medium and high-density attached and detached residential development with a potential build-out of 600 to 800 dwelling units, approximately 110,000 square feet of new commercial floor** area, approximately 8.5 acres for a park and paseo site, and approximately 26.5 acres of open space. **The property consists of 98 acres and** is located within the existing El Dorado Hills Business Park (EDHBP) in the El Dorado Hills area. S

Executive Summary Pursuant to Board Policy J-6, this Initial Hearing is for the conceptual review of a proposed new Specific Plan in the El Dorado Hills Area that w**ould increase the allowable residential density by more than 500 dwelling units.** The proposed Specific Plan (Carson Creek Village) would amend a de-annexed portion of the El Dorado Hills Business Park (EDHBP) from the current General Plan land use designation of Research and Development to a combination of residential, commercial, and park/open space land uses. **The proposed future project would include approximately 47 acres of medium and high-density residential development, including both single-unit and multi-unit housing types, 10 acres of commercial uses**, 8.5 acres of park lands and 26.5 acres of passive open space on a 98-acre parcel, with a potential residential build-out of approximately 600-800 attached and detached dwelling units. Approximately 1.5 acres of existing Research and Development designated land along the southwest project boundary would remain, and these areas of land are included in the proposed Specific Plan.

Town Center West- Mixed Use Project

Requires the Initiation Hearing because it proposes a Specific Plan amendment to allow Mixed Use Development to occur in the Specific Plan area, which would result in a proposed density increase of over 50 units. The existing El Dorado Hills Specific Plan and Development Plan for El Dorado Hills Town Center West allow commercial uses only.

The proposed Town Center West Mixed Use Project contemplates a potential addition of 20 residential units per acre over 116 acres, for a maximum of 2,340 residential units, consistent with the density allowed in Zoning Ordinance Section 130.40.180, Mixed Use Development. **The Applicant intends to develop approximately 47 acres of Town Center West which would have a potential maximum of 940 residential units**.

MONSANTO MANOR

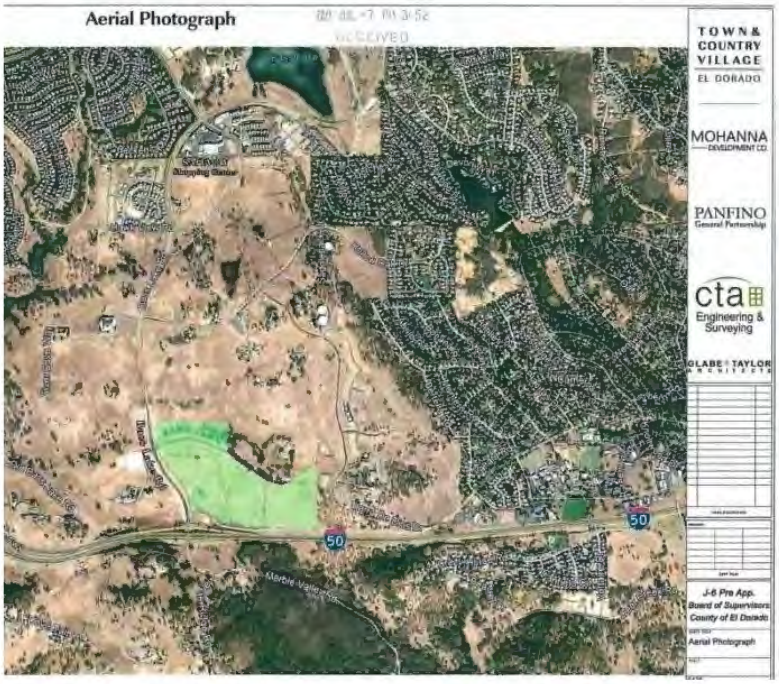
TOTAL 320 MULTI FAMILY UNITS

From the Pre-Application Supplemental Letter

We believe Montano De El Dorado is the prime "Mixed Use" project for this new trend and the future of El Dorado Hills living at this key area where EDH Town Center & Montano meet. This project will lend itself to the encouragement of the walkable path to goods and services directly from the residential front door in a horizontally Mixed-Use environment. Montano currently offers restaurants, banking, spa services, boutiques, morning coffee, and Pilates/fitness services. We are strategically located just one crosswalk away from EDH Town Center where the walkable path continues to movies, shopping, community events and much more.

In closing, while the El Dorado County "Mixed-Use" code and its (Mixed-Use Handbook) primarily focusses on historical revitalization -we ask that you consider the modern definition of "mixed-use" in a well-thought-out setting where the interaction of residential and commercial components can thrive as "a combined use" in an environment where driving can be the choice and a secondary thought. We ask that within the ministerial capacity of the Planning Administrator -Mixed-Use may be added to our Masterplan Entitlements of August 10, 2021.

~~Town & Country Village~~ (Mohanna)



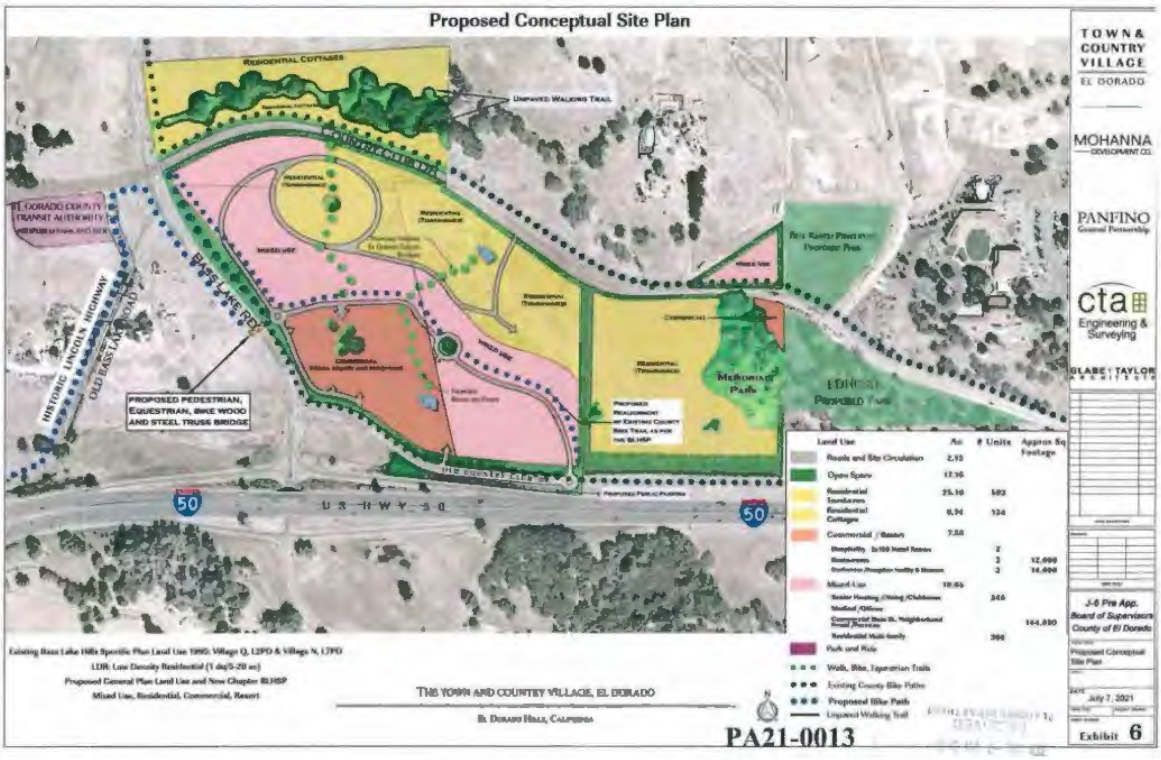


Exhibit B: Conceptual Land Use Matrix - Town & Country Village Pre-Application (PA21-0013)

		Ac.	Unit/Ac.	# Units	Approx. Sq Footage	Present Zoning 1995 Land Use BLHSP
	Roads and Site Circulation	2.13				
	Open Spaces	17.16				L7PD* / L2PD**
	Residential Townhomes	25.16	20	503		L2PD
	Residential Cottages	6.74	20	134		L7PD
	Commercial / Resort	7.55				L2PD
	Hospitality 2X150 Hotel Rooms 300					
	Restaurants 3				12,000	
	Conference/Reception Facility & Museum				14,000	
	Mixed-Use	19.65				L2PD / L7PD
	Senior Housing/Dining/Clubhouse		-	245		
	Medical/Offices					
	Commercial Main St. Neighborhood Retail/Services				144,000	
	Residential Multi-Family		24	390		
	Total	78.39		1,272	170,000	

* L7PD : Low Density Residential Planned Development Maximum 0.7 Units Per Acre (1.42 Acres Per Unit) Average Density

** L2PD : Low Density Residential Planned Development Maximum 0.2 Units Per Acre (5 Acres Per Unit) Average Density

- Townhomes = 503 Un.
- Cottages= 134 Un.
- Senior Housing= 245
- Residen. Mul.Fly.= 390
- **TORAL= 1272 Units**

Generations at Green Valley

Generations at Green Valley Project

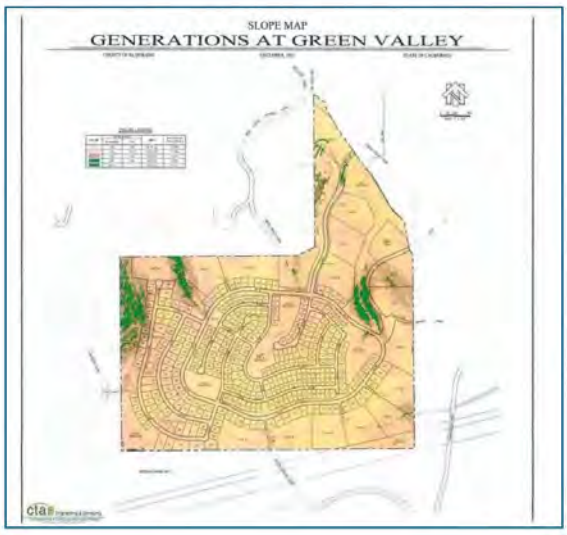
APNs: 126-020-001, 126-020-002, 126-020-003, 126-020-004, and 126-150-023

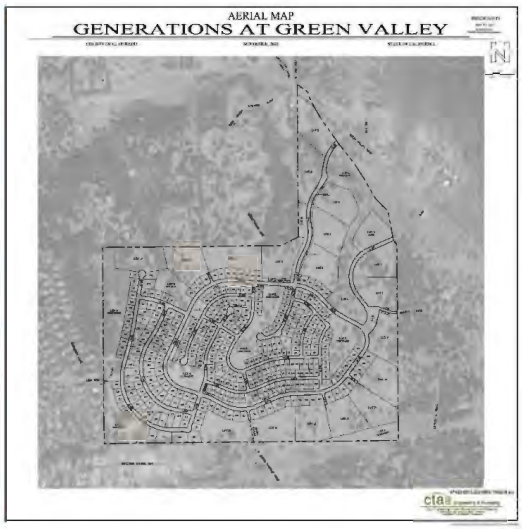
Generations @ GV; Submitted by True Life Companies for an Initiation Hearing (Conceptual Review) for a General Plan Amendment from Low-Density Residential to Medium- and High-Density residential consistent with General Plan Policy 2.2.1.2 for Low-Density Residential. **The Project would require future rezone and 439 residential lot tentative subdivision** map discretionary approvals

The Generations at Green Valley project proposes a General Plan Amendment GPA22-0001, Rezone Z22-0001, and Tentative Subdivision Map TM22-0001, to amend the General Plan land use designations from Low Density Residential (LDR), with approximately 1.4 acres designated Open Space (OS) associated with an existing Sacramento Municipal Utility District (SMUD) utility easement, **to High Density Residential (HDR**), **Low Density Residential (LDR), and Public Facilities (PF);** and a Rezone from Residential Estate, Ten-acre (RE-10), with the SMUD easement zoned as Recreational Facilities, Low Intensity (RF-L), the proposed C-Drive extension area is zoned Residential Estate, Five-acre (RE-5), and the proposed A-Drive Extension is RE-10, to Residential, Single-unit (R1), Open Space (OS), Recreational Facilities, High Intensity (RF-H), and Residential Estate, Five-Acre (RE-5); and a Tentative Subdivision Map to subdivide the -acre project site into **379 residential lots**, clubhouse lot, park site lot, thirteen landscape lots, nine (9) open space lots, and three (3) lots for project roadways.

Age restrictions would apply to 214 of the residential lots.

The project encompasses approximately 280-acres located on five current parcels, Assessor's Parcel Numbers (APNs) 126-020-001, 126-020-002, 126-020-003, 126-020-004, and 126-150-023, and is located on the south side of Green Valley Road approximately 100 feet southeast of the intersection with Malcom Dixon Road, in the El Dorado Hills area, in Supervisorial District 1. The proposed project includes a Development Agreement, DA24-0001. This project has been identified as a project requiring an Environmental Impact Report (EIR). There will be additional review and comment periods throughout the CEQA process.



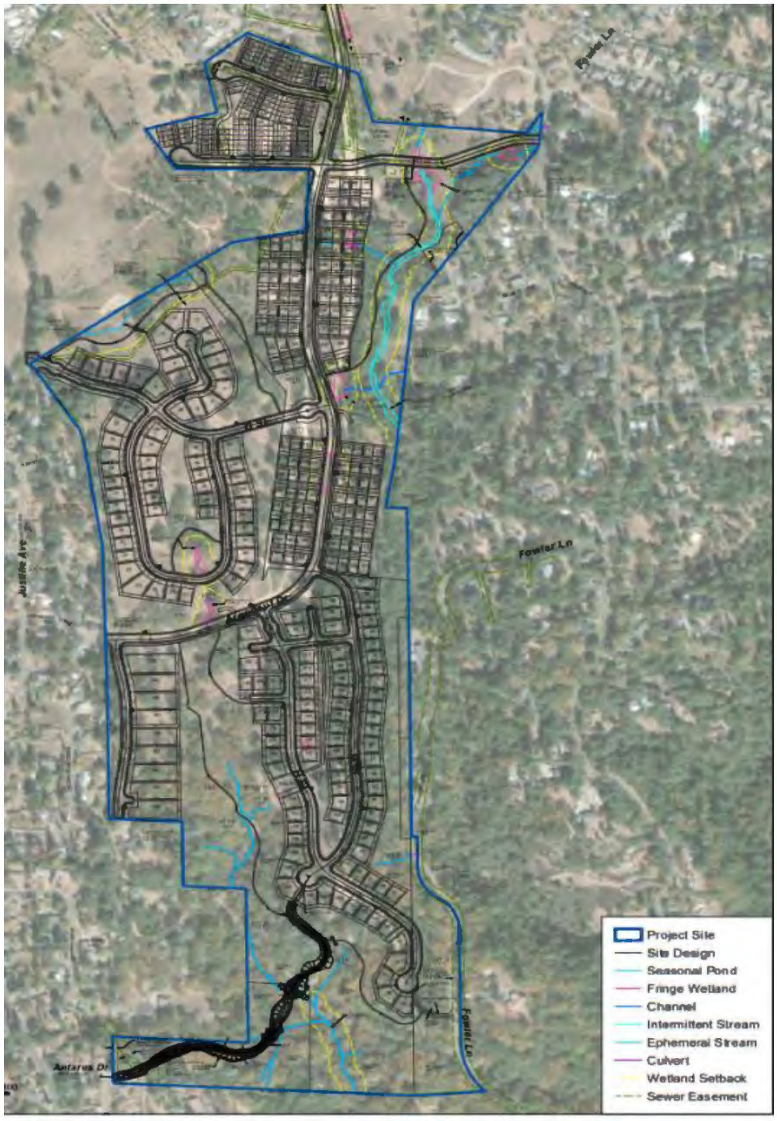


Dorado Oaks Tentative Subdivision Map

A Rezone (Application # Z19-0005) of an approximately 18.1-acre portion of the approximately 142.5-acre project site from Residential, Multi-Unit (RM) to Residential, Multi-Unit - Planned Development (RM-PD), in accordance with the El Dorado County Zoning Code;

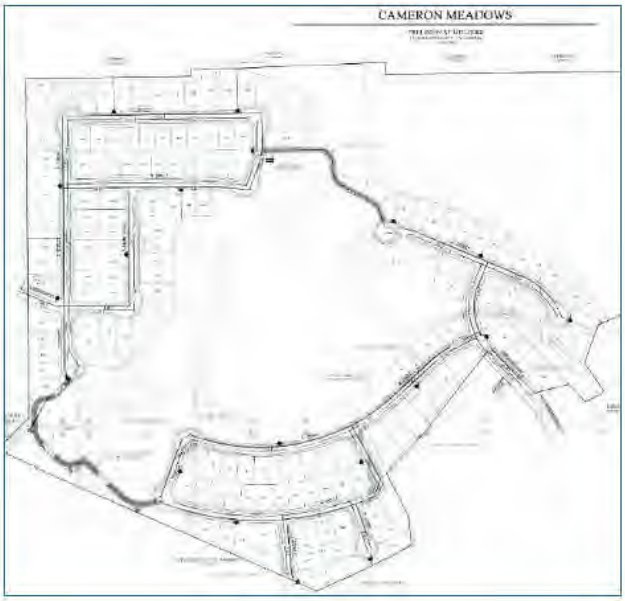
A Phased Tentative Subdivision Map (Application # TM18-1538), to subdivide the property into 14 Large Lots for financing and phasing purposes**, 156 single-family lots ranging in size from 6,000 square feet to approximately 24,000 square feet, 225 multi-family lots ranging in size from approximately 2,000 square feet to 7,170 square feet** ; one single-family lot of approximately 6.4 acres; seven roadway lots; and 18 open space/landscape lots open space/landscape lots in accordance with the El Dorado County Subdivision Ordinance;

- SFD lots = 156 units
- MFly Units= 225
- **Total= 381 units**



Cameron Meadows
APN: 070-011-051
A Tentative Subdivision Map that seeks to utilize the Housing Accountability Act, the Housing Crisis Act (also known as Senate Bill 330 [SB 330]), and the State Density Bonus Law.
The proposed project would **create 161 single-family residential lots ranging in size from 6,300 square feet (sf) to 16,668 sf**.

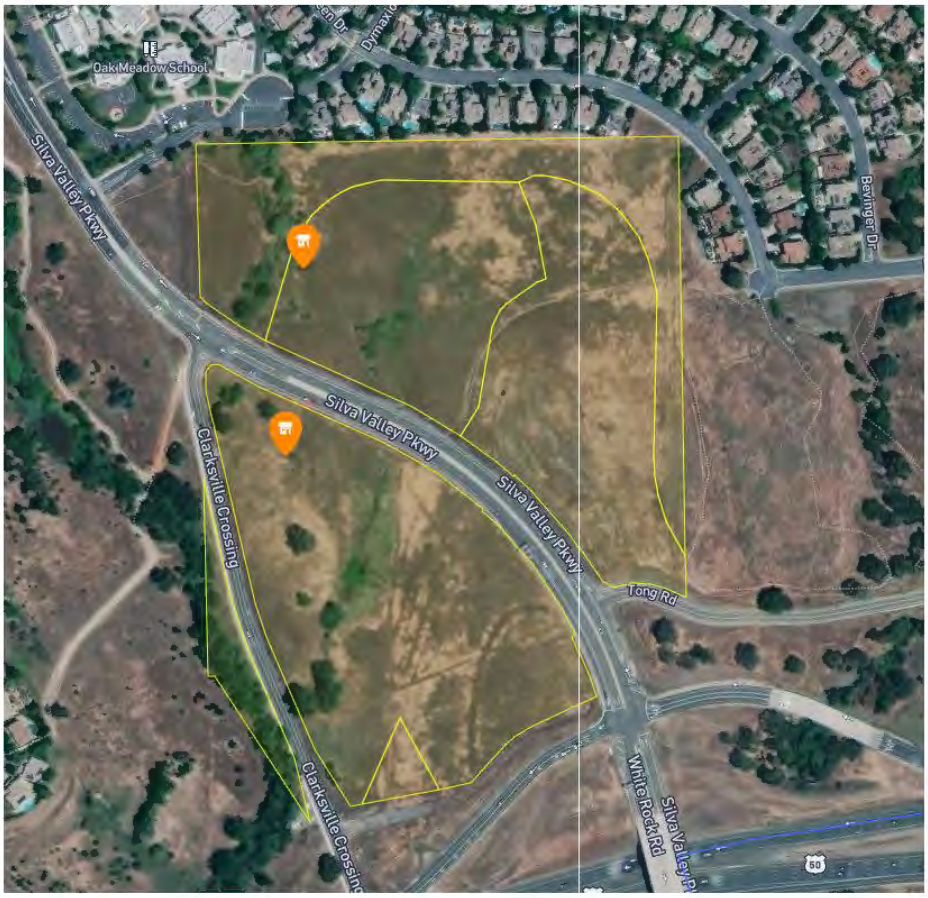
Sixteen of the lots would include an attached Accessory Dwelling Unit (ADU). The ADUs, which represent ten (10) percent of the total dwelling units, are proposed to be deed-restricted to low-income households, thereby qualifying the project to utilize the State Density Bonus Law. The proposed project would result in a density of 1.55 dwelling units per acre, which is within the 1-5 units per acre allowed in the High Density Residential (HDR) land use designation of the General Plan. Rasmussen Pond is located on the property. The property, identified by Assessor's Parcel Number (APN) 070-011-051, **consists of 104-acres**, and located adjacent to Rasmussen Park, east of Mira Loma Drive and north of Carousel Lane, in the Cameron Park area, Supervisorial District 2. This project has been identified as a project requiring an Environmental Impact Report (EIR). There will be additional review and comment periods throughout the CEQA process.



2525 Green Valley Road
PA22-0018
December 14, 2022 in GENERAL PLAN AMMENDMENT, PA22-0018, RESIDENTIAL DEVELOPMENT, REZONE
25.43 acres Green Valley Rd at Silver Springs Pkwy
Rezone from RL-20 (rural lands) to R1 (residential single unit)
General Plan Amendment from Rural Residential (RR) to High Density Residential (HDR)
54 Lots from 0.25 acres to 0.51 acres
LOT A – Preservation of 4.25 acre pond
LOT B – Donation of 0.87 acres (Pleasant Grove House)

EDH 52 Mixed-Use Center
APNs: 122-720-002, 122-720-018, 122-720-019, 122-720-020, and 122-720-021

Proposed development of a new mixed-use development located on both sides of Silva Valley Parkway on approximately **43.26 acres.**
The project would include 304 multi-family residences provided within five 4-story buildings and 14,000 square feet (sf) of retail building space contained within two buildings on the north side of Silva Valley Parkway (North Site) on 24.83 acres,
and an approximately 165,000 sf warehouse retail center on the south side of Silva Valley Parkway (South Site) on 18.43 acres.
The current zoning on the project site is predominantly Commercial, Regional – Planned Development (CR-PD), with small portions on the South Site zoned Commercial, Limited (CL), and Transportation Corridor (TC), and the General Plan land use designation for the project site is Commercial (C).
The project would require: Rezones from CR-PD to Multi-unit Residential – Planned Development (RM-PD) on the North Site and from CL and TC to CR-PD on the South Site; **a planned development for 304 multi-family residences,** 14,000 square feet (sf) of general commercial retail, and 165,000 sf of warehouse commercial retail; a conditional use permit for the establishment of an on-site master sign program; a variance for an increase in sign height and signage area from what is currently allowed in the Zoning Code; a parcel map to subdivide the three existing parcels on the North Site into five parcels ranging in size from approximately 0.94 acres to 9.3 acres in size.



Share Texas Hill Reservoir

Parcel Rezone and General Plan Amendment Project Z24-0002/ GPA 24- 0001
Consists of a ~~County-initiated General Plan Amendment and Rezone for 120 parcels within the site of the formerly proposed Texas Hill Reservoir including~~: The project site, consisting of approximately 1,614 acres, is located on the north side of Pleasant Valley Road at the intersection with Big Cut Road, approximately 1.7 miles south of the City of Placerville,

TEXAS HILL PARCEL REZONES AND GENERAL PLAN AMENDMENT PROJECT LOCATION MAP

El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

Bass Lake Family Apartments

A Pre-Application for Bass Lake Family Apartments, an affordable housing project that seeks to utilize SB 330 and AB 2011 to provide 100% **affordable housing project comprised of 126 apartments with 124 of the apartments reserved for low-income households and two (2) manager's units**. The project includes five (5) buildings totaling 122,508 sq. ft. The proposed project is 100% affordable and eligible for Density Bonus Concessions. The Applicant requests a concession to allow 0% commercial floor area (GFA), whereas a minimum of 30% GFA is typically required as a commercial use in the Commercial Zones. The proposed project would be eligible for up to an 80% Density Bonus. The Applicant requests a +/- 25% Density Bonus. The project includes landscaping and 170 parking spaces. The property, identified by Assessor's Parcel Number 115-410-011, **consists of 5.27 acres**, and is located on the southwest side of Green Valley Road & Bass Lake Road.

Country Club Apartments

Approval of this Parcel Map would result in the creation of four parcels as follows: 4.52 acres (Parcel One), 4.45 acres (Parcel Two), 1.95 acres (Parcel 3), and 4.5 acres (Parcel Four). The resultant parcels meet the required development standards in the RM zone including minimum parcel size and parcel width. Approval of the Design Review would allow the construction and **ongoing occupancy of a 192-unit residential apartment complex** to include parking lot, landscaping, and accessory residential amenities. The proposed parcel map and design review would result in the creation of parcels for development of a multi-family residential apartment complex To be leased at affordable housing rates.

Share Serrano Village M5 Project

APNs: 123-020-023

Proposed development of a **new 20-unit residential subdivision on 20 lots, ranging in size from 7,000 to 19,763 square feet, located on an 8.42-acre site.** The project would include single-family attached residential development and open space, in addition to roadway improvements and new utility hook-ups. The proposed map is provided in the linked PDF. The current zoning of the project site is Single-unit Residential, minimum lot size 20,000 square feet (R20K) and the General Plan land use designation for the project site is AP (Adopted Plan). The project would require a Subdivision to 20 lots ranging in size from 7,000 sf to 19,763 sf, a Zone Change from R20K to R1-PD (Single-unit Residential, Planned Development Combining Zone) and OS (Open Space), and a Planned Development to add the PD overlay to the Zone Change.

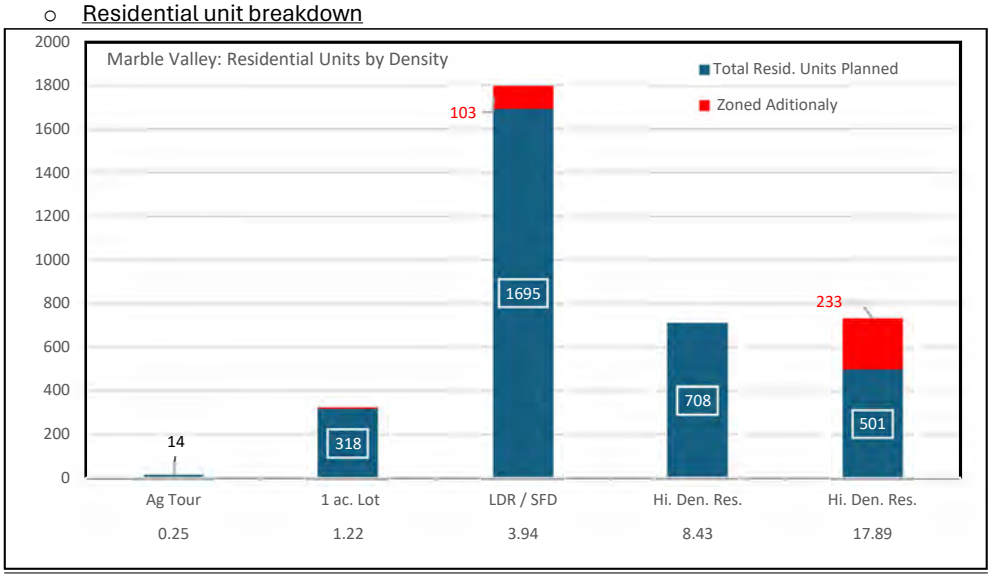
Green Valley Road
PA22-0018 2525
December 14, 2022 in GENERAL PLAN AMMENDMENT, PA22-0018, RESIDENTIAL DEVELOPMENT, REZONE
25.43 acres Green Valley Rd at Silver Springs Pkwy
Rezone from RL-20 (rural lands) to R1 (residential single unit)
General Plan Amendment from Rural Residential (RR) to High Density Residential (HDR)
54 Lots from 0.25 acres to 0.51 acres
LOT A – Preservation of 4.25-acre pond
LOT B – Donation of 0.87 acres (Pleasant Grove House)

Subject: MARBLE VALLEY LAND USE STUDY
To: EDH- APAC
From: Alastair Dunn
19 May 2024

Summary

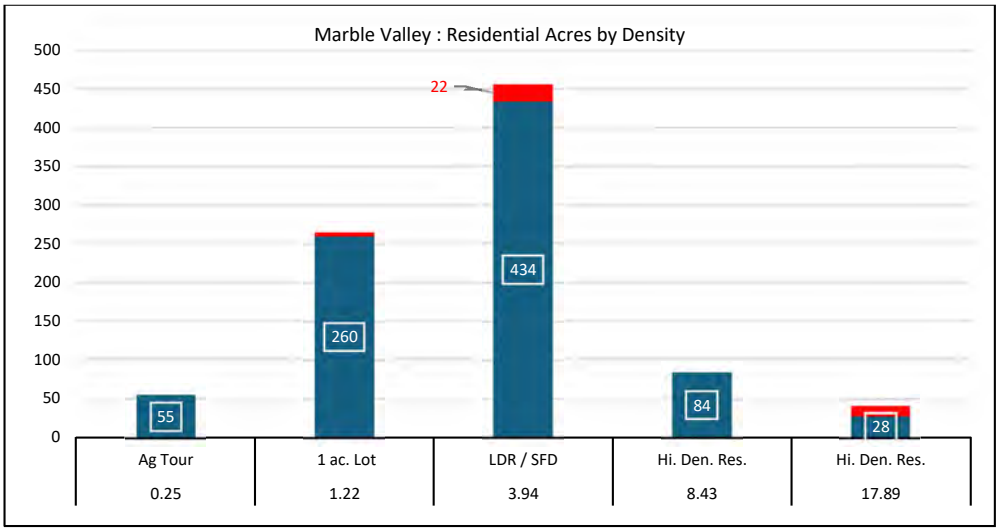
- Marble Valley's Public Review Draft – May 2023: The land use count indicated a total of 3,236 units.
- However, land use analysis revealed an additional unit count of 340 on parcels designated schools, village park and public utilities, bringing the total lot count to 3,576 units.
- Because the low density residential did not discriminate between very low (large lot) and standard low density residential in the 4.5 units per acre range, an additional category was added to give a better picture of what Marble Valley is really offering.
- The graphs below summarizes using density as a discriminating criterion on the "X" axis:

  - Residential unit breakdown

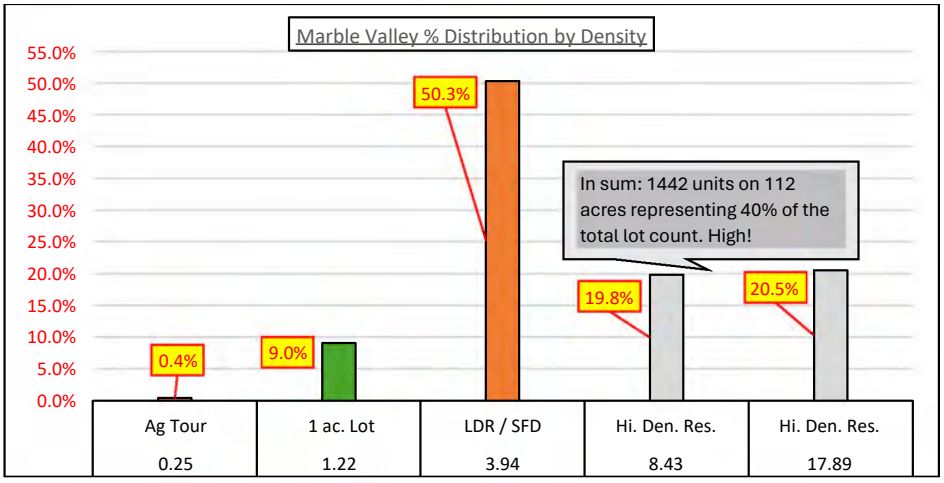


The zoning count significantly adds 103 standard low density lots plus 233 very high-density apartments / condos; not an insignificant lot count addition.

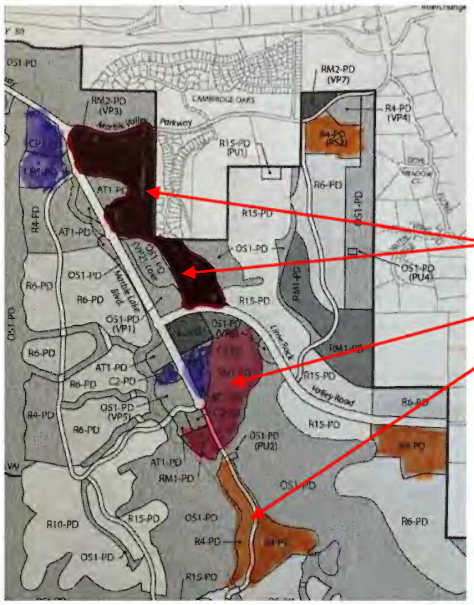
  - Acreage breakdown



- Percentage (%) distribution



- The graph above indicates that Marble Vally's density is – as expected - very high, 62% of the units in 28% of the area.



Land use	Parcels #	Zoning	Area (Ac)	Units	Density
Medium Resid.	4a+4b+	RM2-PD	28.0	501	17.89
Village Park	9c	R2-PD	8.0	143	17.89
Village Comm.	6a	C1-PD	9.0	50	?
Medium Resid.	3a+3b+3c	RM1-PD	84.0	708	8.43
Village Park	9d	R4-PD	6.0	28	4.67
Village Resid. Low	2G	R4-PD	120.0	560	4.67
TOTAL: HIGH, MEDIUM & SFD@4.T upa			**255.0**	**1,990.1**	
AS % OF TOTAL DE RESIDENTIAL			*28%*	*62%*	

- The above notwithstanding, this is a good land use plan and fortunately there is plenty of open space to the south.
- Even if total lot count is not the problem, water, and traffic impact at Hy.50, is sure to be.
- I shall research "water availability" next.

Supporting tables below

Additional residential through zoning designations

Land use	Parcels+ D3:D51	Zoning	Area (Ac)	Units	Commercial #	Density
Village Resid. Low	1A+1B+1C+	R4>15-PD	685	1,963		2.87
Medium Resid.	3a+3b+3c	RM1-PD	84	708		8.43
Medium Resid.	4a+4b+	RM2-PD	28	501		17.89
TOTAL RESIDENTIAL			**797**	**3,172**		**3.98**
AG.TOUR -Viyd			55	14		0.25
Commercial			57	50	**407,500**	
TOTAL RES.UNITS + Aditional			**909**	**3,236**		
SCHOOLS			35	75		2.13
VILLAGE PARK			47	261		5.54
PUBLIC UTILITY			5.0	4.9		0.98
Residential units added by zoning			**87**	**340**	**407,500**	
TOTAL RESIDENTIAL WITH ZONING ADDITIO			**996**	**3,576**	**407,500**	

	Ag Tour	1 ac. Lot	LDR / SFD	Hi. Den. Res.	Hi. Den. Res.	TOTAL UNITS
Total Resid. Units Planned	**14**	**318**	**1,695**	**708**	**501**	**3,236**
Acres>	55.0	260.0	434.0	84.0	28.0	**861**
Density>	0.25	1.22	3.91	8.43	17.89	**32**
						-
Zoned Aditionaly	**-**	**5**	**103**	**-**	**233**	**340**
Acres>	0	5	22	0	13	**40**
Density>		0.98	4.67		17.89	**24**
						-
TOTAL RESIDENTIAL	**14**	**323**	**1,798**	**708**	**734**	**3,576**
Acres>	55	265	456	84	41	**901**
Density>	0.25	1.22	3.94	8.43	17.89	3.97

Data for graphs shown.

Proposed Project: Base data, May 2023

Land use	Parcels+D3:D51	Zoning	Area (Ac)	Units	Commercial #	Density
		*sq.ft.'000				
Village Resid. Low	1A+1B+1C+1D+1F	R15-PD	197.0	193		**0.98**
Village Resid. Low	1E	R10-PD	63.0	125		**1.98**
Village Resid. Low	2a+2b+2c+2d+2e+2f	R6-PD	305.0	1085		**3.56**
Village Resid. Low	2G	R4-PD	120.0	560		**4.67**
Village Resid. Low		*	**685.0**	**1963**		**2.87**
Medium Resid.	3a+3b+3c	RM1-PD	84.0	708		**8.43**
Medium Resid.	4a+4b+	RM2-PD	28.0	501		**17.89**
Medium Resid.			**112.0**	**1209**		**10.79**
TOTAL RESIDENTIAL			**797.0**	**3,172.0**		**3.98**
Office Park	4a+4b	C1-PD	41.0		375,000	**9,146**
Village Comm.	6b+6c+6d+6e	C2-PD	7.0		25,000	**3,571**
Village Comm.	6a	C1-PD	9.0	50	7,500	**833**
Commercial			**57.0**	**50**	**407,500**	**7,149**
AG.TOUR -Viyd	7a+b+c+d+e+f+g+h+i+j	AT1-PD	55.0	14		**0.25**
Public Schools	8a	RM2-PD	19.0			
Public Schools	8b	R4-PD	16.0	75		**4.67**
SCHOOLS			**35**	**75**		
Village Park	9a	OS1-PD	10.0			
Village Park	9b	OS1-PD	10.0			
Village Park	9c	R2-PD	8.0	143		17.89
Village Park	9d	R4-PD	6.0	28		4.67
Village Park	9e	OS1-PD	6.0			
Village Park	9f	OS1-PD	2.0			
Village Park	9g	RM2-PD	5.0	89		17.89
VILLAGE PARK			47.0	261	-	40.5
Public Utilities	10a	R15-PD	5.0	5		**0.98**
Public Utilities	10b	OS1-PD				
Public Utilities	10c	AT1-PD				
Public Utilities	10d	OS1-PD				
PUBLIC UTILITY			**5.0**	**4.9**		
PUBLIC FACILITIES			**87.0**	**340.2**		
Commu.Open Sp.	11-a (N.Deer Crk)	OS1-PD	743.0			
	11b-Hy 50 Scenc	OS1-PD	75.0			
Private Op.Sp.	11c- Foundation	OS2-PD	466.0			
TOTAL OPEN SPACE			**1,284.0**			
ROAD IMPACT AREA	**Right of Way**	**ROW**	**61.0**			

Project briefing book: May 2011

Estate	**368**	**140.8**	2.61
1 ac. Lot	**280**	**192.4**	1.46
LDR / SFD	**1,838**	**493.7**	3.72
Hi. Den. Res.	**1,018**	**114.4**	8.90
Com. + Rec + of.	**40**	**65.2**	0.61
School		**20.6**	
Parks		**50.3**	
Activity Area		**129.9**	
Vineyard		**38.4**	
Open Space		**1,023.6**	
Street		**71.7**	
TOTAL	**3,544**	**2,341.0**	

MEMORANDUM
To: John Davey, Chairman, EDH – APAC
From: Alastair Dunn

Subject: Marble Valley Mass Grading & Oakland Impact

Purpose
The purpose of this Memo is to review the Proponent's intentions as to mass grading on Marble Valley and to set forth the basis for registering a comment to the DEIR of May 2024.

Foreword:
The Proponent's proposal to mass grade 712 acres of land in Marble Valley appears not to be a subject for discussion in Marble Valley's DEIR. The proponent's presentation in pages 3.1-16 to 31 appears to be compliant with CEQA by merely citing County policies and mitigation measures that, in effect, allow to mass grade and eradicate all oak woodland over 78% of the area destined for development. As written, the DEIR allows the Proponent to undertake actions that, in the absence of such policies, would have been disallowed in the first place. This memorandum questions prima facie the Proponent's position and requests the County to address the comments made herein.

DRI Comment
In a DEIR the proponent continually and repetitively cites County policies along with mitigation measures, including citations as to a "significant impact" on Oakland canopy all the while claiming compliance with CEQA. I present Exhibit 2 with excerpts from pages 3.1-16 to 31of the DEIR to illustrate where the repetitive nature of the policies and mitigation measures justify their future actions. I also point out that the entire 532-page document is extremely difficult to follow in a readable manner and confusing to anyone trying to make a specific and coherent "comment" on the Marble Valley's DEIR.

My question is simple: Is it to be my understanding that, given the County policies cited and with mitigation measures implemented, the developer shall be allowed to level 712 acres and eradicate 130 acres of oakland through mass grading? Does not CEQA require such action to be evaluated as an environmental impact?

Throughout the DEIR's 532 pages, I cannot find where the subject of mass grading is being treated as a significant and avoidable impact in terms of affecting oakland canopy on the affected 712 acres referenced. I find no qualifying statements regarding the action shall have on oakland coverage despite the fact the very same document refers specifically to Thresholds of Significance In accordance State CEQA Guidelines.

Therefore my "comment" on the DEIR regarding Chapter 3, pages 3.1.16 to 31 is; that there should be mitigating factors to mass grading on such a gargantuan scale such as "avoiding" identified tree areas (clumps) or trees of certain caliper in a manner more sensitive to CEQA's requirements. And that merely stating in: Marble Valley Specific Plan, Site Design Standards B-14: "Mass pad grading, or the grading of any individual lot of a development parcel, shall be permitted **by right** in the R4-PD, R6-PD,**R10-PD**, RM1-PD, RM2-PD, C1-PD, C2-PD, C3-PD, and the **AT1-PD** zones". Not to mention that the R10-PD and AT1-PD zones have densities of 2.0 and 0.25 units per acre where mass grading should be disallowed altogether.

Observations:
In support of the above comment, I offer the following:

1. Although the terrain is undulating there are many areas over the generally accepted 15% threshold that requires careful grading, if any.

Consider the table published by the … engineers as a guideline, andD use and	Suitability Rating	Residential	Commercial	Industrial Park
Slight	Optimum	0–6%	0–6%	0–2%

Consider the table published by the … engineers as a guideline, andD use and	Suitability Rating	Residential	Commercial	Industrial Park
Moderate	**Satisfactory**	**6–12%**	**6–12%**	**2–6%**
Severe	**Marginal**	**12–18%**	**12–18%**	**6–12%**
Very Severe	Unsatisfactory	>18%	>18 %	>12 %

https://www.codepublishing.com/CA/Calimesa/html/Calimesa18/Calimesa1855.html#18.55.040

2. The slope analysis offered, using – albeit crude – Google Earth cross sections of the valley In Exhibit 3 attached, seeks to qualify the proponent's intentions.
3. The rough grading plan – Figure B.8 (map) below - does not provide the details required for such an impact on Oakland canopy. The word "preliminary" underscores the need for greater detail.
4. The statements made in the texts provided in the DEIR and Proponent's Marble Valley Specific Plan have many caveats and allow the proponent to seek ministerial approval of a plan. For 712 acres of grading, a mere ministerial approval?
5. The County's on and offsite mitigation measures and in-lieu fees provide no disincentive to the proponent to undertake a more "sculptured" approach to grading and "avoid" eradicating all oaks over 78% of the residential acreage.

Recommendation

For the DEIR to be more attendant of the true impact mass grading will have on Marble Valley, the following should be required of the proponent

1. Provide a detailed slope analysis of projects (or group of projects in a sub area) identifying the specific % slopes.
2. Provide a tree survey (identifying trees over 12" caliper) along with its georeferenced location in the areas to be mass graded.
3. Provide a rough grading plan for the above areas along with clusters of oak trees and individual trees to be "saved".

Mass grading and oakland impacts

Albeit comparing apples to oranges, I find it hard to reconcile the mass grading area of 712 acres with 150 acres of canopy where only 130 acres are impacted. Does having 1137.8 acres of canopy justify impacting 227.6 of Oakland?

Table 6.1: Oak Canopy Retention (in acres)

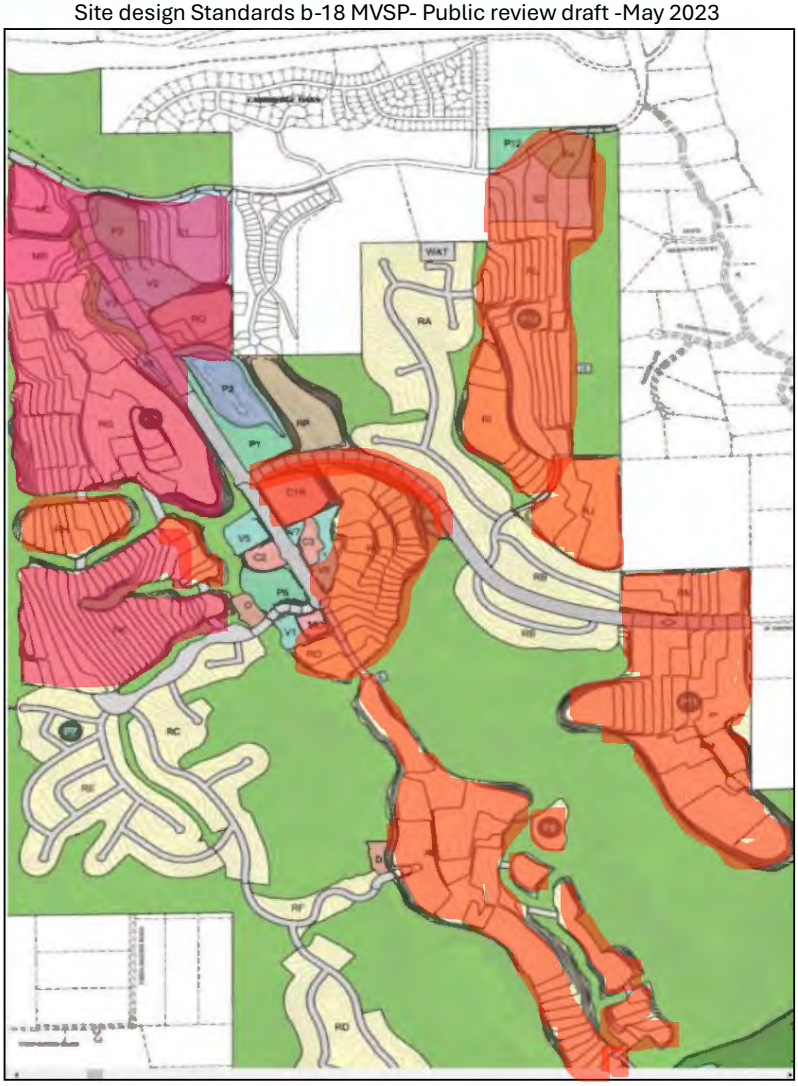
Retention Percentage	Land Use	Canopy Acreage	Estimated Impacts
0	Major Roads, Commercial	13.3	13.3
10	Park (Joint-Use w/ School)	5.7	5.1
15	School	19.5	16.6
17	Residential (Pad Graded)	156.6	130.0
20	Office Park	8.3	6.6
40	Minor Roads, Crossings	38.7	23.2
75	Residential (Custom), Park	129.3	32.3
100	OS, Detention Area	757.3	0.0
Exempt	Agri-Tourism	9.1	NA
Totals		1,137.8	227.2

Maximum Oak Canopy Impact per GP Policy 7.4.4.4	**227.6**
Minimum Oak Canopy to be Retained per GP Policy 7.4.4.4	**910.2**

The table below quantifies the mass grading areas to be impacted.

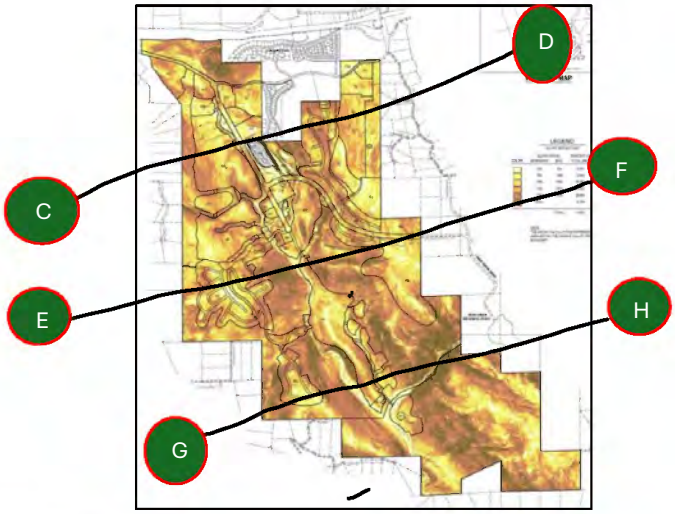
Land use	Parcels #	Zoning	Area (Ac)	Units	Gross Density
Village Resid. Low	1E	R10-PD	63.0	125	2.0
Village Resid. Low	2a+2b+2c+2d+2e+2f	R6-PD	305.0	1085	3.6
Village Resid. Low	2G	R4-PD	120.0	560	4.7
Medium Resid.	3a+3b+3c	RM1-PD	84.0	708	8.4
Medium Resid.	4a+4b+	RM2-PD	28.0	501	17.9
Office Park	4a+4b	C1-PD	41.0		
Village Comm.	6b+6c+6d+6e	C2-PD	7.0		
Village Comm.	6a	C1-PD	9.0	50	
AG.TOUR -Viyd	7a+b+c+d+e+f+g+h+i	AT1-PD	55.0	14	0.25
AREAS TO BE MASS GRADED			712.0	3,043	
Percent (%) of Total			*78%*	*94.0%*	
TOTAL RESIDENTIAL PLANNED			909.0	3,236	

Below: Excerpt of Figure B.8 Preliminary Rough Grading Exhibit,
Site design Standards b-18 MVSP- Public review draft -May 2023



Just by visual inspection one may appreciate the impact of mass grading shall have.

Slope analysis:
In the DEIR, page 3.5-10, the proponent cites Table 3.5-1: project Area Slope Information, **to manifest that 30% slopes shall not be touched**! The map and cross sections are counter to the Proponent's manifestations.



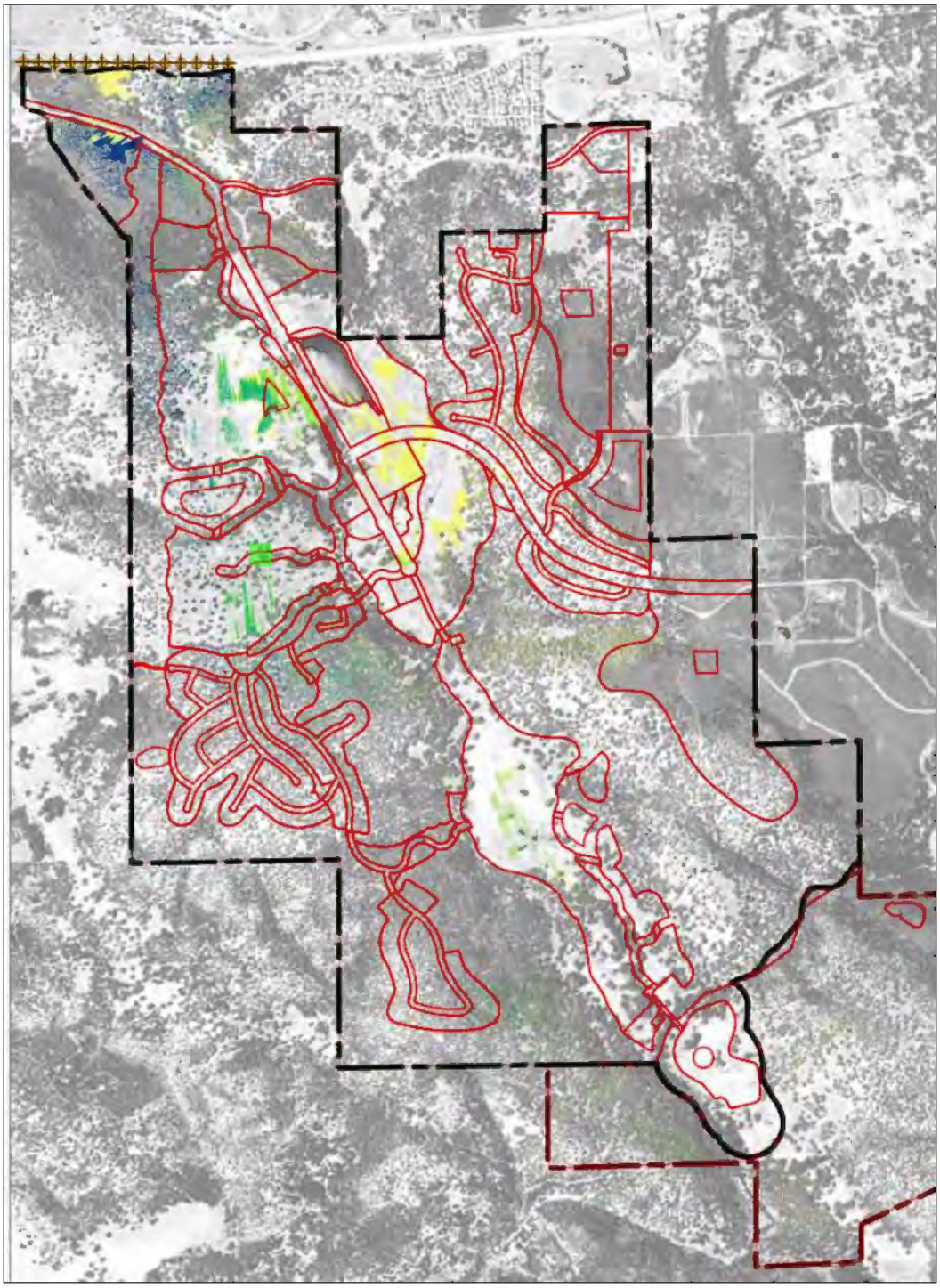
Refer to map exhibit for cross section C > D

Cross section E > F

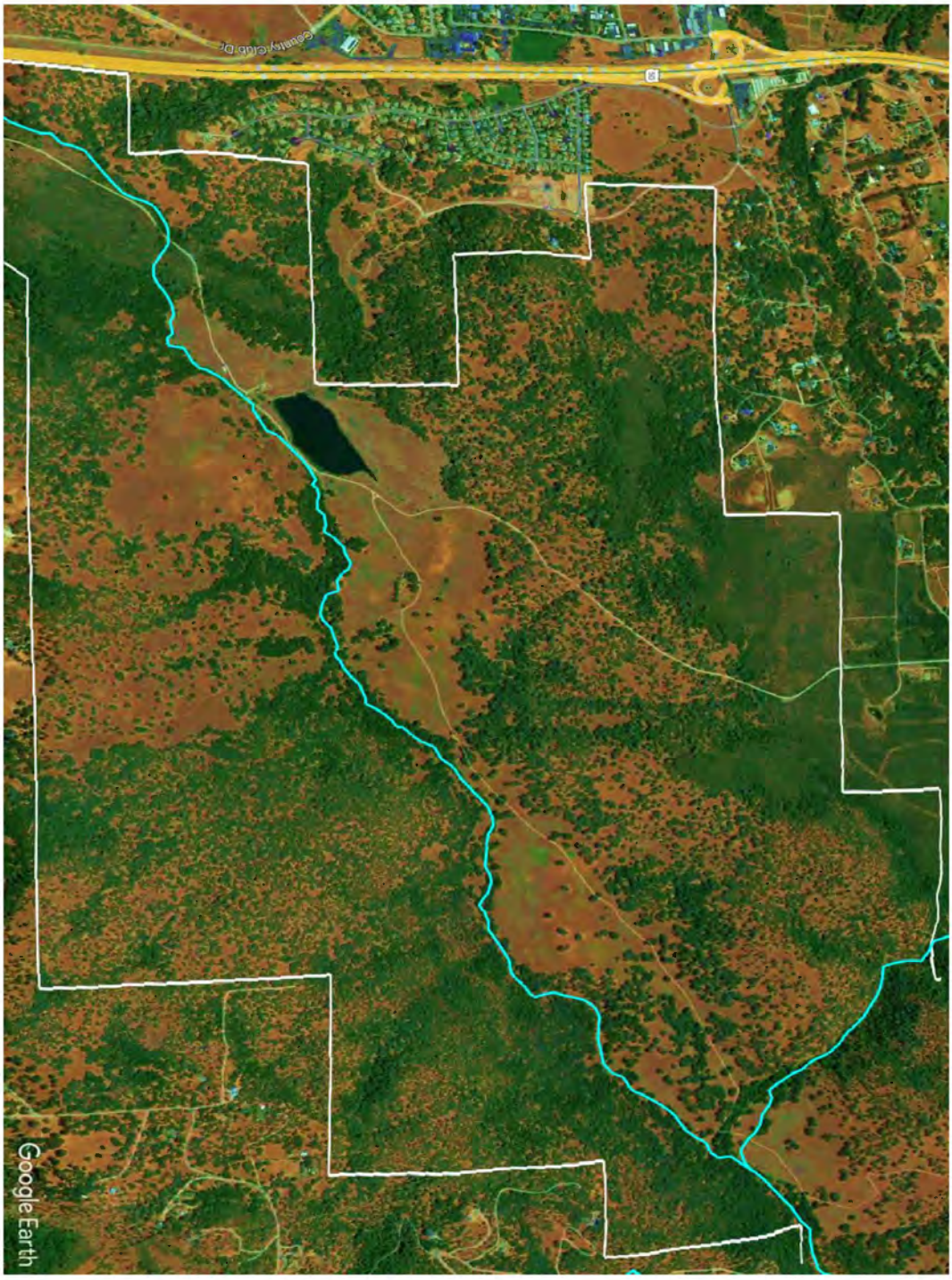
Cross section G> H

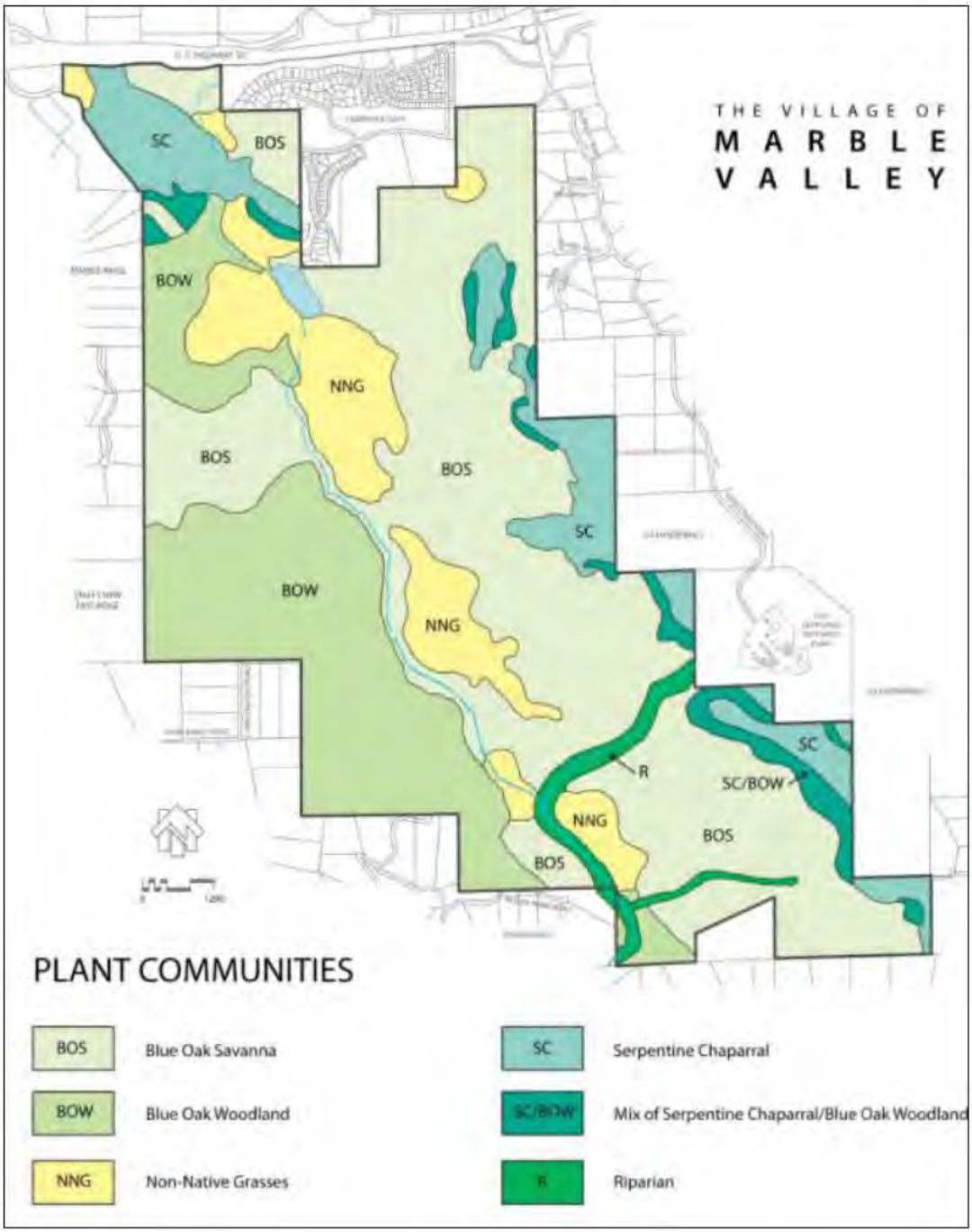
For specific slope readings please refer to the slope analysis in Exhibit 1 attached.

EXHIBIT 1: MAPS

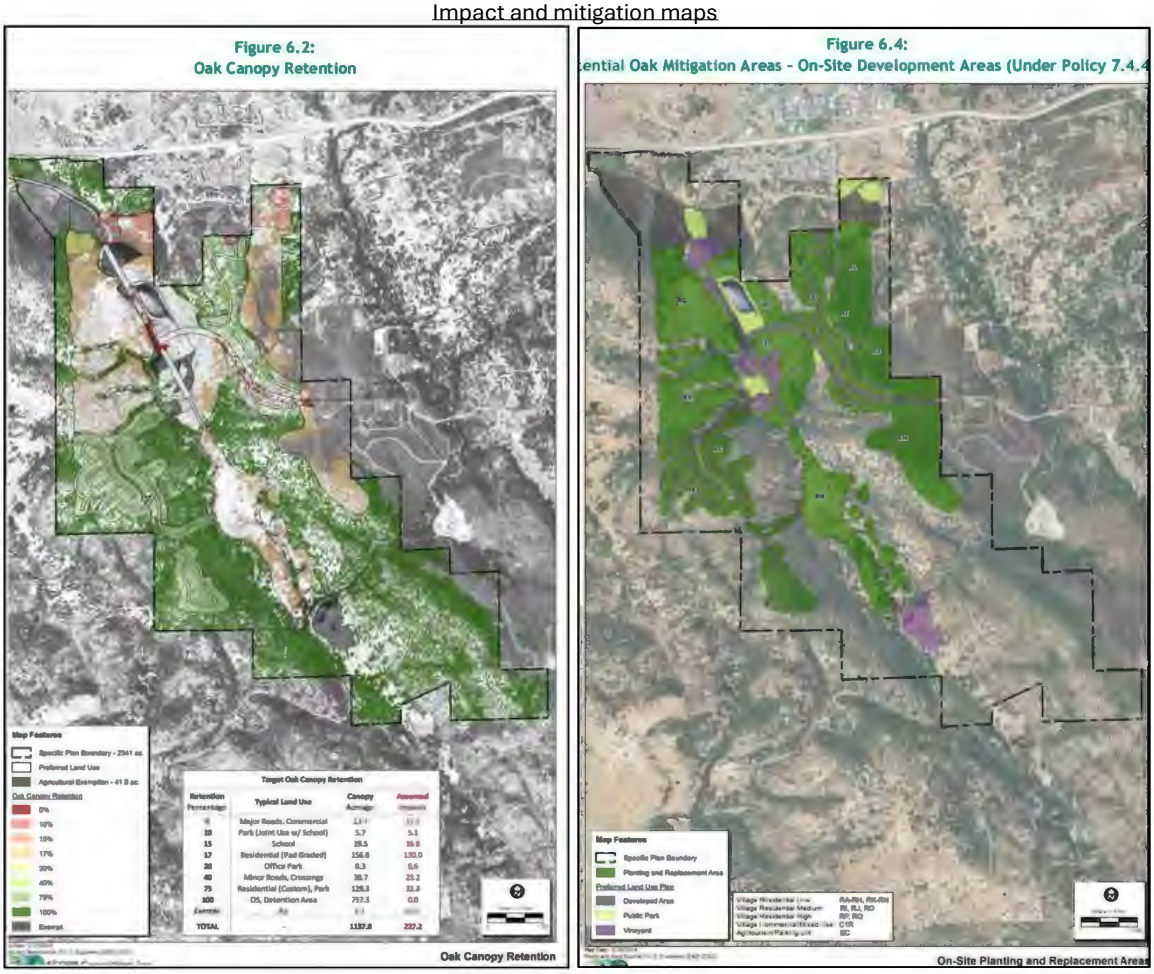


Google Earth – 2021 Canopy Coverage





Impact and mitigation maps



This is no small impact and mitigation on the areas rough graded?
Does not present much logic.

EXHIBIT 2: DEIR EXCERPTS

County Oak Woodlands Policy 6.29:

The following bullet points are cited solely for the purpose of underscoring the intent of this policy.
Policy 6.29 states: "to maintain consistency with Option A of Policy 7.4.4.4 at the time that development entitlement applications are submitted, implement the mitigation, conservation, and preservation strategies described in the BRS/IHMP, including, but not limited to, the following"

- Design and cluster development areas to minimize oak woodland impacts ….
- To limit disturbance and impacts to biological resources.
- Retain contiguous stands of oak woodland habitat …
- To minimize impacts on custom or individually pad-graded lots … measures to minimize impacts to oak trees, such as limiting excessive pad grading.

Environmental Impacts Methods of Analysis Using the concepts and terminology described at the beginning of this section and criteria for determining significance, described below, analysis of the visual effects of the project are based on the following.

According to professional standards, a project may be considered to have significant impacts if it would substantially:

1. Conflict with local guidelines or goals related to visual quality.
2. Alter the existing natural viewsheds, including changes in natural terrain where the project dominates the view.
3. Alter the existing visual quality of the region
4. Alter the existing visual quality of the region or eliminate visual resources.
5. Increase light and glare in the project vicinity.
6. Obstruct or permanently reduce visually important features.
7. Result in long-term (i.e., persisting for 2 years or more) adverse visual changes or contrasts to the existing landscape as viewed from areas with high visual sensitivity.

El Dorado County Impact Analysis Aesthetics Village of Marble Valley Specific Plan Draft Environmental Impact Report 3.1-22 May 2024 103660.0.001

Portions of the Village Residential, Low (VRL) and Open Space (OS) on the eastern and western portions of the site would be moderately visible, as indicated by the green shading. The site is currently undeveloped.

1. The proposed project would result in a substantial amount of oak tree removal.
2. alteration of grasslands and oak woodlands.
3. introduction of a substantial number of built features associated with a large-scale, mixed-use planned community where none presently exists; and
4. alteration of the existing visual context in which cultural resources, Marble Lake and Marble Creek, and remaining oak woodlands and grasslands occur.

The project would also be required to comply with County General Plan policies and County zoning ordinances that seek to reduce project impacts and aid in preserving onsite visual resources.

1. These policies and zoning ordinances are listed under Regulatory Setting in Section 3.1.2, Existing Conditions, and detailed in Appendix B.
2. The policies include development standards and protocols to limit and guide the establishment of compatible land uses and design guidelines, minimize tree impacts, create land use buffers, limit excessive grading and development on slopes and ridgelines, minimize outdoor lighting, protect natural drainages and wetlands, install utilities underground, guide the installation of telecommunication facilities, limit the modification of National Register of Historic Places (NRHP)/California Register of Historical Resources (CRHR) structures, and limit the alteration of open space land uses.

All these measures would aid in reducing … the proposed project's long-term impacts by

1. ensuring that the project is designed to be sensitive to the existing landscape.
2. that natural, cultural, and onsite visual resources are preserved to the degree possible; and
3. that buffers aid in screening onsite development from surrounding land uses.

3.1-17
The VMVSP includes policies that would ensure that the proposed project would

1) integrate a suburban community environment with the rural character of the area (Policies 5.1 through 5.11),
2) be sensitive to the site's natural and aesthetic resources (Policies 3.4, 3.6, and 3.9), and

Minimize the El Dorado County Impact Analysis Aesthetics Village of Marble Valley Specific Plan Draft Environmental Impact Report 3.1-18 May 2024 103660.0.001 visual intrusion on the landscape by:

a) **preserving oak trees** (Policies 6.29 through 6.35**),**
b) **cultural resources** (Policies 5.12 through 5.14 and 6.36 through 6.39), and
c) **other aesthetic qualities and features of the project site** (Policies 6.3 through 6.28 and 6.40 through 6.48).

3.1-18
The project applicant would be required to comply with the County's Oak Woodland Preservation and Replacement Policy (General Plan Policy 7.4.4.4), and other County policies and zoning ordinances that seek to minimize impacts on the site's natural resources.

1. However, these natural resources would still be substantially affected, as described in Section 3.3, Biological Resources ….
2. Mitigation Measure BIO-1d would reduce impacts on these natural resources to a less-than significant level.

Nevertheless, many mature oak trees and grasslands would be removed, and the project site would be graded, altering the naturally rolling terrain to accommodate building pads.

3.1-19
Mitigation Measure BIO-1d: Avoid and minimize potential disturbance of oak woodland habitat and compensate for loss of oak woodland and individual trees
Impact AES-2: Have a substantial adverse effect on a scenic vista (significant and unavoidable)

The project site is currently undeveloped, and scenic vista views would be affected by vegetation removal and construction of a large mixed-use planned community associated with the proposed project.
The proposed project would:

1. result in a substantial amount of oak tree removal.
2. alteration of grasslands and oak woodlands.
3. introduction of a substantial number of built features associated with a largescale, mixed-use planned community where none presently exist; and
4. alteration of the existing visual context in which cultural resources, Marble Lake and Marble Creek, and remaining oak woodlands and grasslands occur

3.1-19
The project applicant would be required to comply with the County's Oak Woodland Preservation and Replacement Policy (General Plan Policy 7.4.4.4), and other County policies and zoning ordinances that seek to minimize impacts on the site's natural resources.

3. these natural resources would still be substantially affected, as described in Section 3.3, Biological Resources. Mitigation Measure BIO-1d would reduce impacts on these natural resources to a less-than significant level.
4. In addition, these policies and measures would aid in reducing construction-related impacts associated with the proposed project and the proposed project's long-term impacts by ensuring that the project minimizes impacts to oak woodlands, which are an aesthetic resource.

Nevertheless, many mature oak trees and grasslands would be removed, and the project site would be graded, altering the naturally rolling terrain to accommodate building pads.

3.1-20
Mitigation Measure BIO-1e: Maintain retained oaks in development areas Impact AES-3: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a scenic highway (significant and unavoidable)

As described above, the VMVSP includes policies that would ensure that:

- the proposed project would be designed to integrate with the rural character of the area (Policies 5.1 through 5.11), sensitive to the site's natural and aesthetic resources (Policies 3.4, 3.6, and 3.9), and
- would minimize the visual intrusion on the landscape by preserving oak trees (Policies 6.29 through 6.35), cultural resources (Policies 5.12 through 5.14 and 6.36 through 6.39), and
- other aesthetic qualities and features of the project site (Policies 6.3 through 6.28 and 6.40 through 6.48).

The project would also be required to comply with County General Plan policies and County zoning ordinances that seek to reduce project impacts and aid in preserving onsite visual resources. These policies and zoning ordinances are listed under the Regulatory Setting in Section 3.1.2 and detailed in Appendix B.

3.1.21
Mitigation Measure AES-2: Apply aesthetic design treatments to buildings within oak woodland and grassland areas Mitigation Measure BIO-1e: Maintain retained oaks in development areas Impact AES-4:

In non-urbanized areas, substantially degrades the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality (significant and unavoidable)

As addressed in Section 3.3, the oak canopy impact area totals 227.2 acres*, as defined under General Plan Policy Section 7.4.4.4, and the oak woodland impact under the Oak Resources Conservation Ordinance and the ORMP (El Dorado County 2017) totals 689.4 acres of oak woodland, and 9,244 inches of individual native oak trees. Impacts on biological resources in this area may be mitigated both onsite and offsite.

1. Because mitigation may be provided offsite, affected resources are not likely to be replaced in kind onsite. In addition, oaks are slow growing, and it would take more than 2 years for newly planted trees to mature and replace some of the visual value lost as a result of tree removals.
2. Compliance with County General Plan Policy 7.4.4.4 and implementation of the Important Habitat Mitigation Program prepared for the project and compliance with the ORMP would result in the retention and replacement of oak woodland.

***Comment: How does the figure of 227.2 acres of woodland impacts square with the 732 acres of mass grading? This question must be answered. Note: the 732 acre measure is provided by the applicant by identifying the zoned areas.**

As described in Section 3.9, Land Use, the project site is within a Rural Region.
Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality in an urbanized area and there would be no impact.

- Discussion of this topic is, therefore, excluded from further discussion in the analysis below. Impacts and Mitigation Measures Impact AES-1;
- Temporary visual impacts caused by construction activities (significant and unavoidable)

3.1-22
Such changes would be visible from US 50, as illustrated in Figure 3.1-4 (photo below) that shows existing conditions and the proposed conditions of the VMVSP.

Compared to existing conditions, the proposed project would permanently alter the existing visual character of the view for which this portion of US 50 was designated as scenic.

1. The proposed project would change the visual landscape from oak woodland and grassland open space to a planned development, permanently altering the existing visual character and aesthetic resources of this foothill transition area and decreasing the amount of such resources available in the region and vicinity.
2. The proposed project would alter the existing visual character of the site in this manner, as evident in the simulation.
3. The proposed project would also develop housing that would be visible on the hillsides, left of center and behind the office building complex in the simulation.
4. In addition, the scale of the commercial areas that would be developed in the valley (in the center of the simulation), makes this area visible from eastbound US 50.

Maintain retained oaks in development areas Impact AES-4:

1. The proposed project would result in a substantial amount of oak tree removal, alteration of grasslands and oak woodlands, introduction of substantial number of built features associated with a large-scale, mixed-use planned community where none presently exist, and alteration of the existing visual context in which cultural resources, Marble Lake and Marble Creek, and remaining oak woodlands and grasslands occur.
2. Figure 3.1-4 illustrates visible changes from the scenic portion of eastbound US 50, but this simulation is also representative of the visual changes that other viewers in the vicinity would be likely to see where views are available, such as from rural residential areas and local roadways.
3. The figure shows existing conditions and the proposed conditions of the VMVSP.
4. The proposed project would change the visual landscape from oak woodland and grassland to a planned development, permanently altering the existing visual character and aesthetic resources of this foothill transition area and decreasing the amount of undeveloped land in the region and vicinity.
5. The proposed project would introduce a large-scale office building complex in foreground views visible from eastbound US 50, Cambridge Oaks residential area, Holy Trinity Parish, and the bicycle/pedestrian trail (former Country Club Drive).
6. The proposed project would also develop housing that would be visible on the hillsides, left of center and behind the office building complex in Figure 3.1-4.
7. In addition, the scale of the commercial areas that would be developed in the valley (center of the simulation), makes this area visible from eastbound US 50, Cambridge Oaks residential area, Holy Trinity Parish, and the bicycle/pedestrian trail (former Country Club Drive).
8. The existing trees in the open space buffers would limit views toward the project site for many viewers east, south, and west of the site, but where trees are sparse and elevation and terrain permit, views may be available.

9. Views out and over the site would also be seen from rural residential areas at higher elevations south and west of the project site.
10. The permanent conversion of the site from a scenic natural area to one with built features associated with development would reduce the visual quality of these views and are likely to affect sensitive viewer groups and views from the project vicinity.

As described above, the VMVSP includes policies that would ensure that the proposed project would be designed to

1) integrate with the rural character of the area (Policies 5.1 through 5.11),
2) sensitive to the site's natural and aesthetic resources (Policies 3.4, 3.6, and 3.9), and
3) would minimize the visual intrusion on the landscape by preserving oak trees (Policies 6.29 through 6.35),
4) cultural resources (Policies 5.12 through 5.14 and 6.36 through 6.39), and
5) other aesthetic qualities and features of the project site (Policies 6.3 through 6.28 and 6.40 through 6.48).
6) The project would also be required to comply with County General Plan policies and County zoning ordinances that seek to reduce project impacts and aid in preserving onsite visual resources.
7) These policies and zoning ordinances are listed under the Regulatory Setting in Section 3.1.2 and detailed in Appendix B.
8) The policies include development standards and protocols to limit and guide the establishment of compatible land uses and design guidelines, minimize tree impacts, create land use buffers, limit excessive grading and development on slopes and ridgelines, minimize outdoor lighting, protect natural drainages and wetlands, underground utilities, guide the installation of telecommunication facilities, limit the modification of NRHP/CRHR structures, and limit the alteration of open space land uses.

However, the impact on a scenic resource would be significant.

Mitigation Measure AES-2 would reduce the visual prominence of the buildings located within oak woodland and grassland areas and
Mitigation Measure BIO-1e would ensure that trees conserved in residential lots are maintained and replaced when dead, retaining the oak canopy that remains, but would not reduce visual impacts on views from US 50 associated with the proposed project to a less-than-significant level.

The impact on scenic resources along a scenic highway would be significant and unavoidable.

Mitigation Measure AES-2: Apply aesthetic design treatments to buildings within oak woodland and grassland areas Mitigation Measure BIO-1e:

The VMVSP includes policies that would ensure that the proposed project would

a) integrate a suburban community environment with the rural character of the area (Policies 5.1 through 5.11),
b) be sensitive to the site's natural and aesthetic resources (Policies 3.4, 3.6, and 3.9), and
c) minimize the visual intrusion on the landscape by preserving oak trees (Policies 6.29 through 6.35), cultural resources (Policies 5.12 through 5.14 and 6.36 through 6.39), and other aesthetic qualities and features of the project site (Policies 6.3 through 6.28 and 6.40 through 6.48).

The project would also be required to comply with County General Plan policies and County zoning ordinances that seek to reduce project impacts and aid in preserving onsite visual resources. These policies and zoning ordinances are listed under the Regulatory Setting in Section 3.1.2 and detailed in Appendix B.
The policies include development structures and protocols to limit and guide the establishment of compatible land uses and design guidelines, minimize tree impacts, create land use buffers, limit excessive grading and development on slopes and ridgelines, minimize outdoor lighting, protect natural drainages and wetlands, underground utilities, guide the installation of telecommunication facilities, limit the modification of NRHP/CRHR structures, and limit the alteration of open space land uses.

The combination of potential viewer sensitivity, permanent visual changes to the site, and scenic nature of existing, undeveloped views toward Marble Valley would result in impacts that would be significant.

i) Mitigation Measure AES-2 would reduce the conspicuousness of the buildings located within oak woodland and grassland areas,
ii) Mitigation Measure AES-4 would improve noise barrier aesthetics and ensure that the appearance of noise barriers is consistent with the surrounding project vicinity, and
iii) Mitigation Measure BIO-1e would ensure that trees conserved in residential lots are maintained and replaced when dead, retaining the oak canopy that remains.

However, these mitigation measures would not reduce visual impacts associated with the proposed project to a less than-significant level.

The impact on the visual character and quality of the project site and its surroundings would be significant and unavoidable.

i) Mitigation Measure BIO-1e: Maintain retained oaks in development areas Impact AES-5:
ii) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area (significant and unavoidable)
iii) Once the proposed project has been built, permanent features such as windows and building surfaces and temporary features such as parked cars would introduce new sources of glare.

3.1-22
Mitigation Measure BIO-1d: Avoid and minimize potential disturbance of oak woodland habitat and compensate for loss of oak woodland and individual trees Impact AES-2: Have a substantial adverse effect on a scenic vista (significant and unavoidable)

The project site is currently undeveloped, and scenic vista views would be affected by vegetation removal and construction of a large mixed-use planned community associated with the proposed project.
Vista views are likely to include more visible project elements than ground-level views of the proposed project because viewers can see out and over the proposed project from vista vantages located on hillsides around the project area at a higher elevation than the proposed project.

The proposed project would result in a substantial amount of oak tree removal; alteration of grasslands and oak woodlands; introduction of a substantial number of built features associated with a largescale, mixed-use planned community where none presently exist; and alteration of the existing visual context in which cultural resources, Marble Lake and Marble Creek, and remaining oak woodlands and grasslands occur.

These changes would be noticeable in scenic vista views available from Holy Trinity Parish, the bicycle/pedestrian trail (former Country Club Drive), the south side of US 50, and the western edge of Cameron Park and rural residential areas south and west of the project site. Figure 3.1-4 i

3.1-24
Mitigation Measure BIO-1e: Maintain retained oaks in development areas Impact AES-3: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a scenic highway (significant and unavoidable)

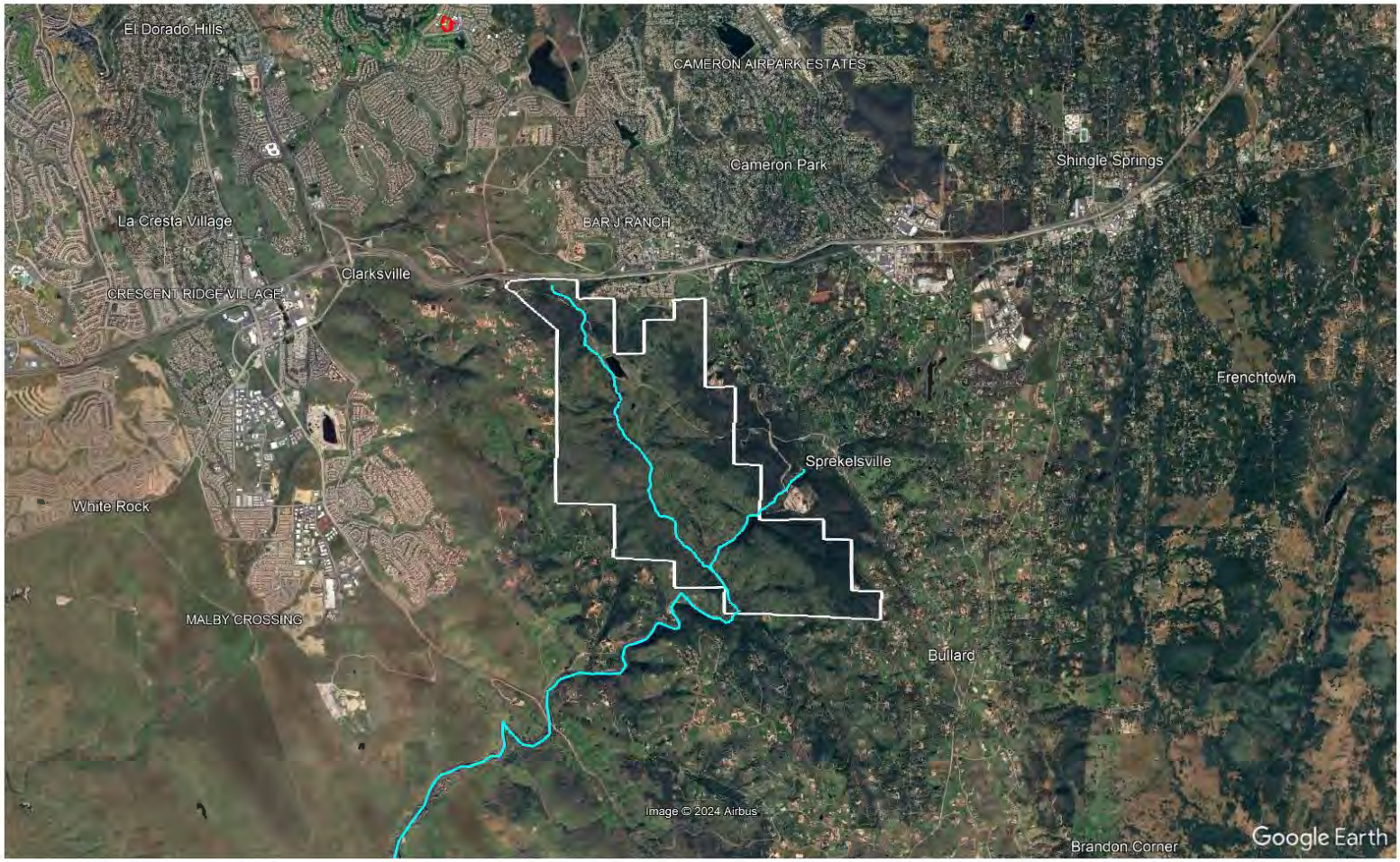
There are no federal- or state-designated scenic roadways in the project area but, as shown on Figure 3.1-1, a portion of US 50 bordering the project site is recognized by the County as a corridor with important public scenic viewpoints because of existing views of Marble Valley. Figure 3.1-3 is a viewshed analysis from US 50 that illustrates the visibility of the proposed project from eastbound US 50. Portions of the project closest to US 50 that are designated Office Park (OP) would be the most visible, indicated by the blue shading, while portions of the interior that are designated Village Commercial (VC); Village Residential, High (VRH); Village Residential, Medium (VRM); Village Park (VP); and Agriculture Tourism (AT) would be less visible, as indicated by the yellow shading.

EXHIBIT 3: SEE ATTACHED

ADDENDUM: MARBLE VALLEY & SURROUNDINGS AND SLOPE ANALYSIS

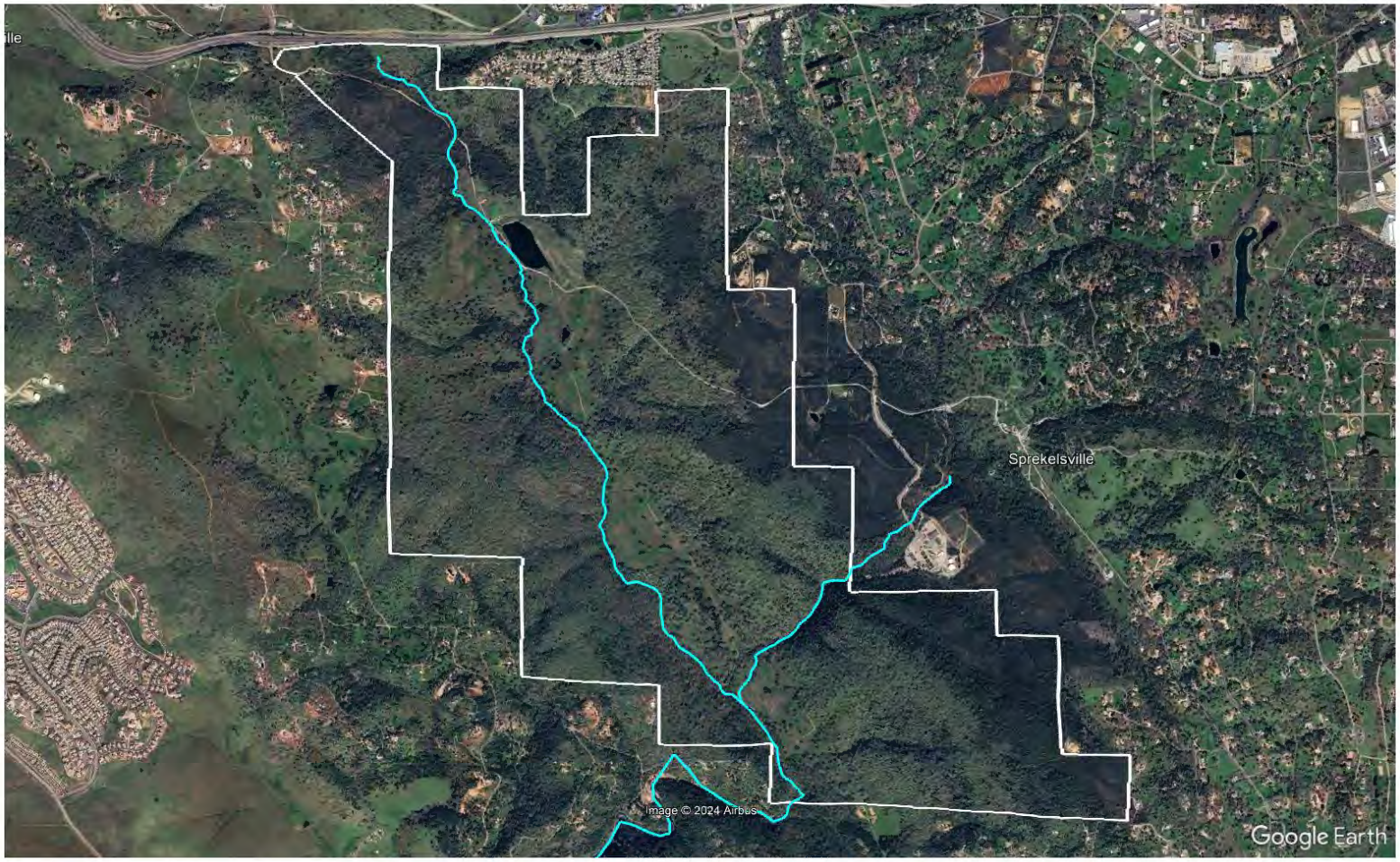
ADDENDUM: MARBLE VALLEY & SURROUNDINGS

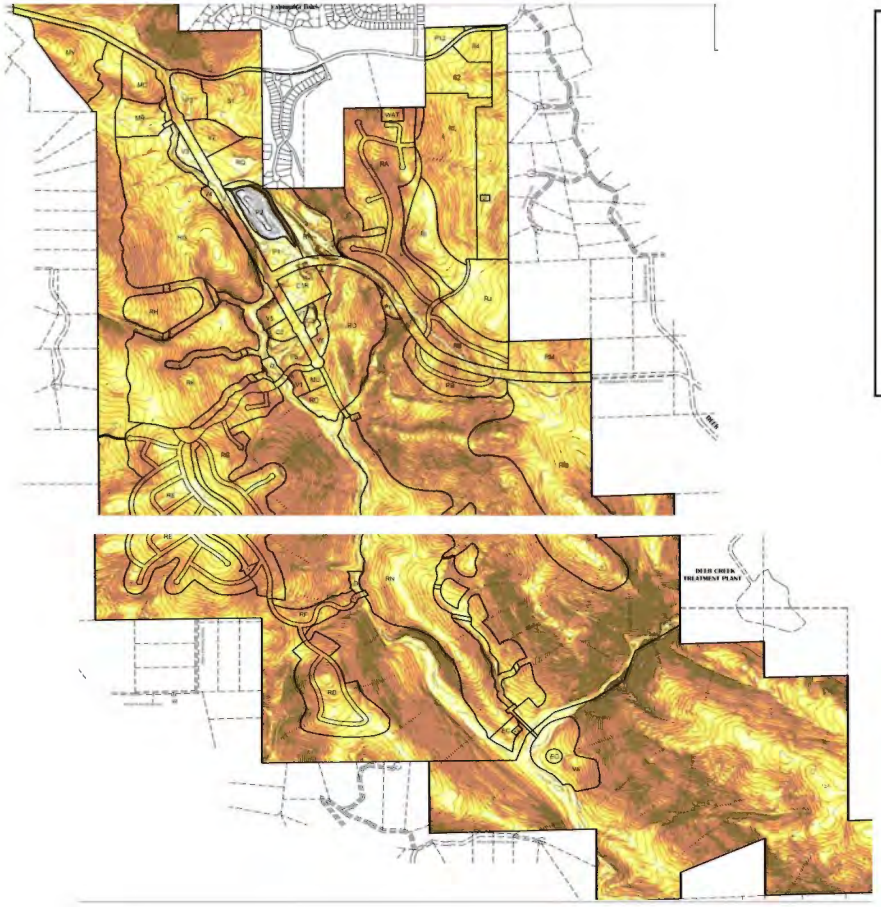
AND SLOPE ANALYSIS



.... the last gem surrounded by development

MARBLE VALLEY PROPERTY





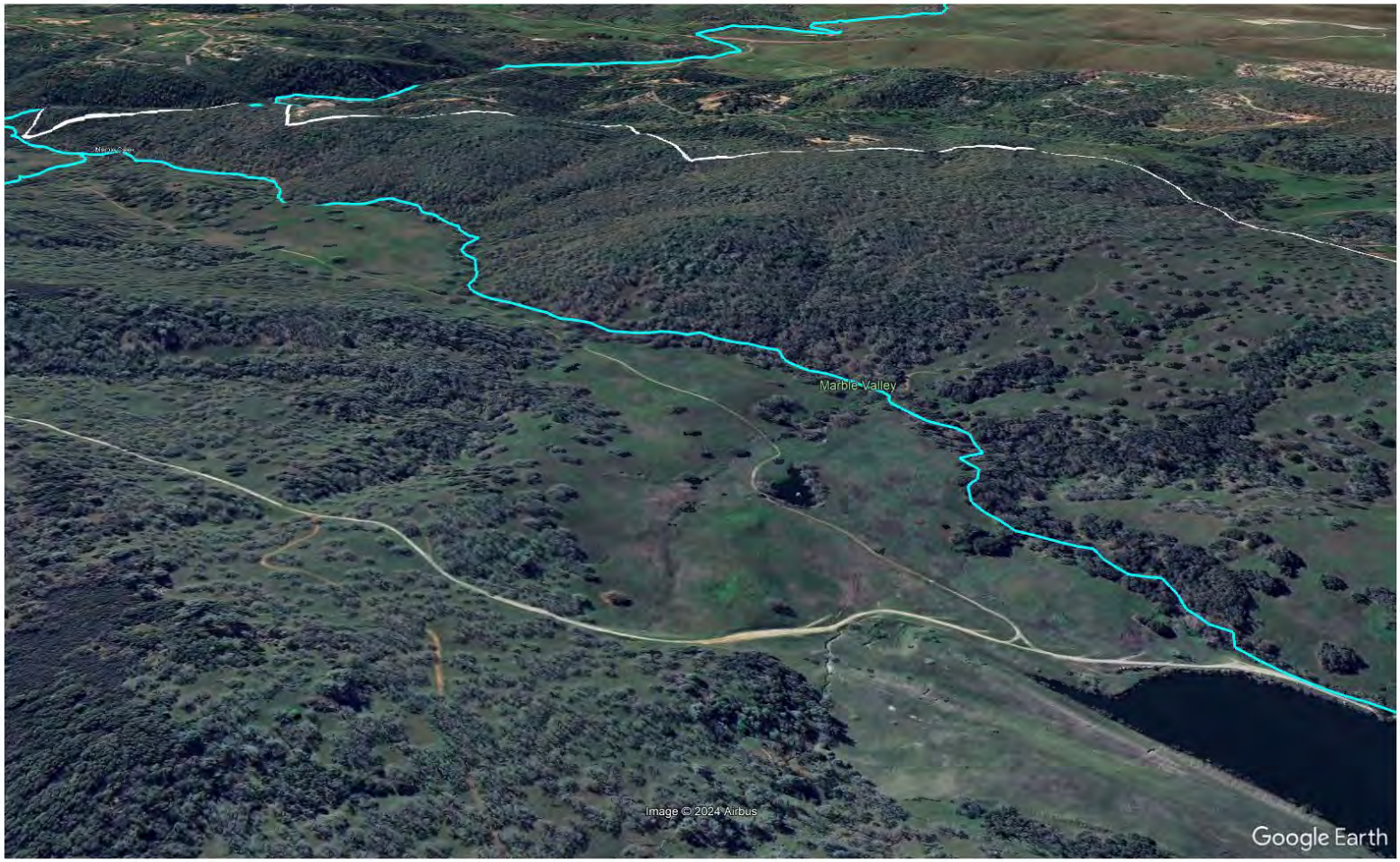
LEGEND

SLOPE PERCENTAGE

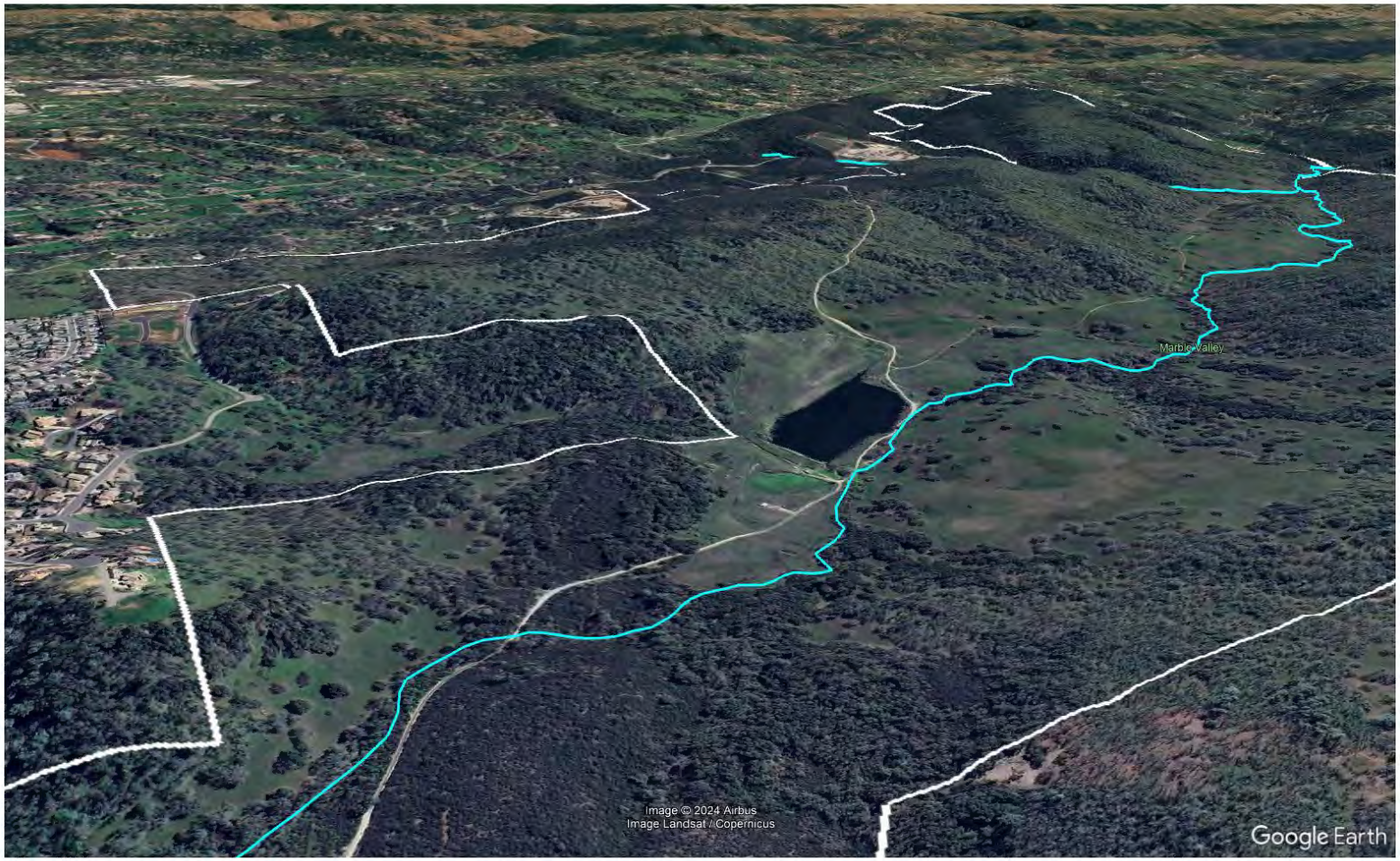
COLOR	SLOPE RANGE BEGINNING	SLOPE RANGE END	PERCENT OF TOTAL AREA	AREA
	0%	5%	4.5%	104.0 AC
	5%	10%	13.4%	313.5 AC
	10%	15%	20.6%	480.0 AC
	15%	20%	20.2%	470.6 AC
	20%	30%	26.8%	625.8 AC
	30%+		14.5%	337.8 AC
		TOTAL	100%	2331.7 AC

...please note that tis analysis was undertaken solely using the tools offered by Google Earth. The property lines were visually interpreted following fence lines.

A splendid view looking south-east



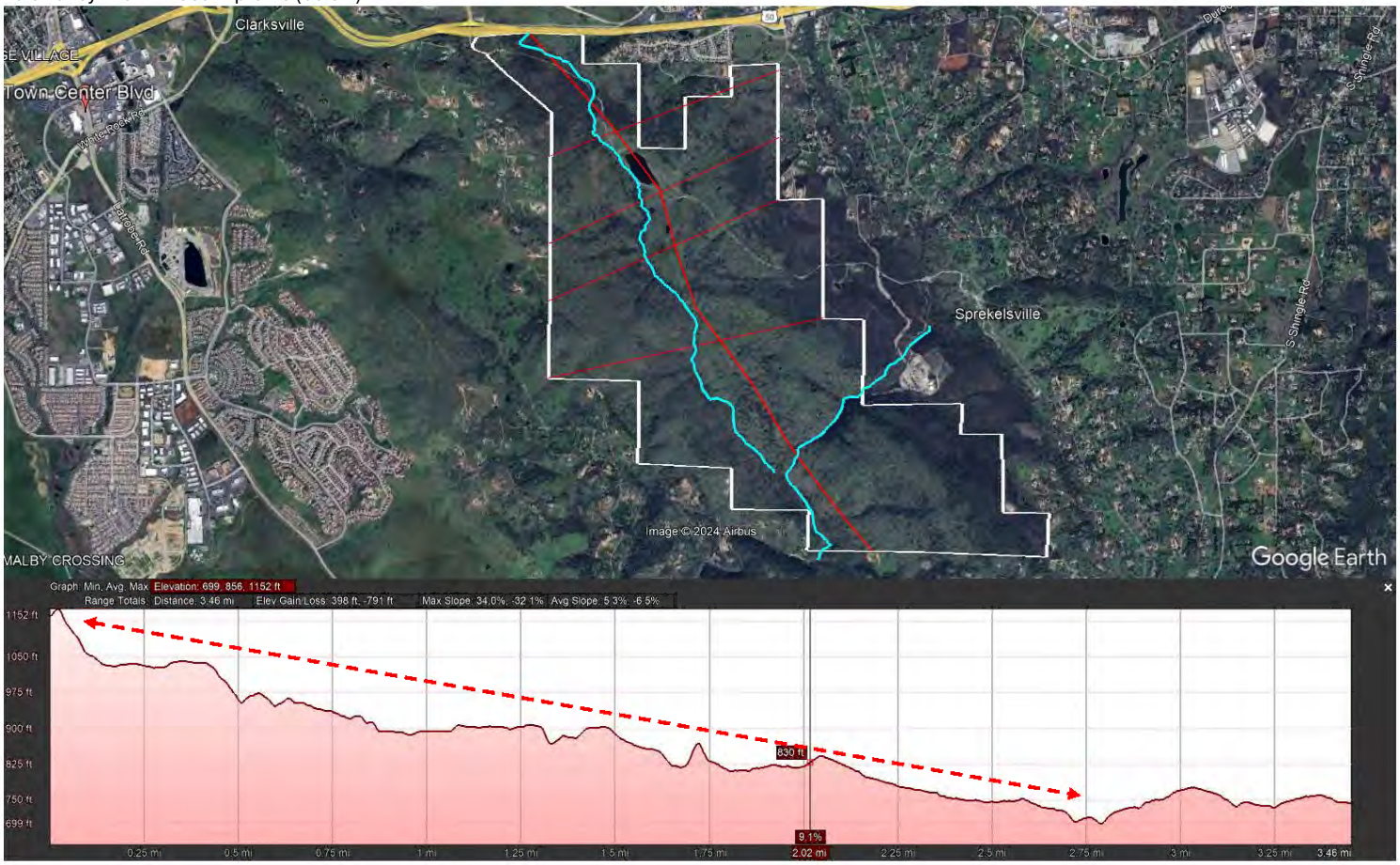
... another splendid view looking south-west



MARBLE VALLEY SLOPE ANALYSIS

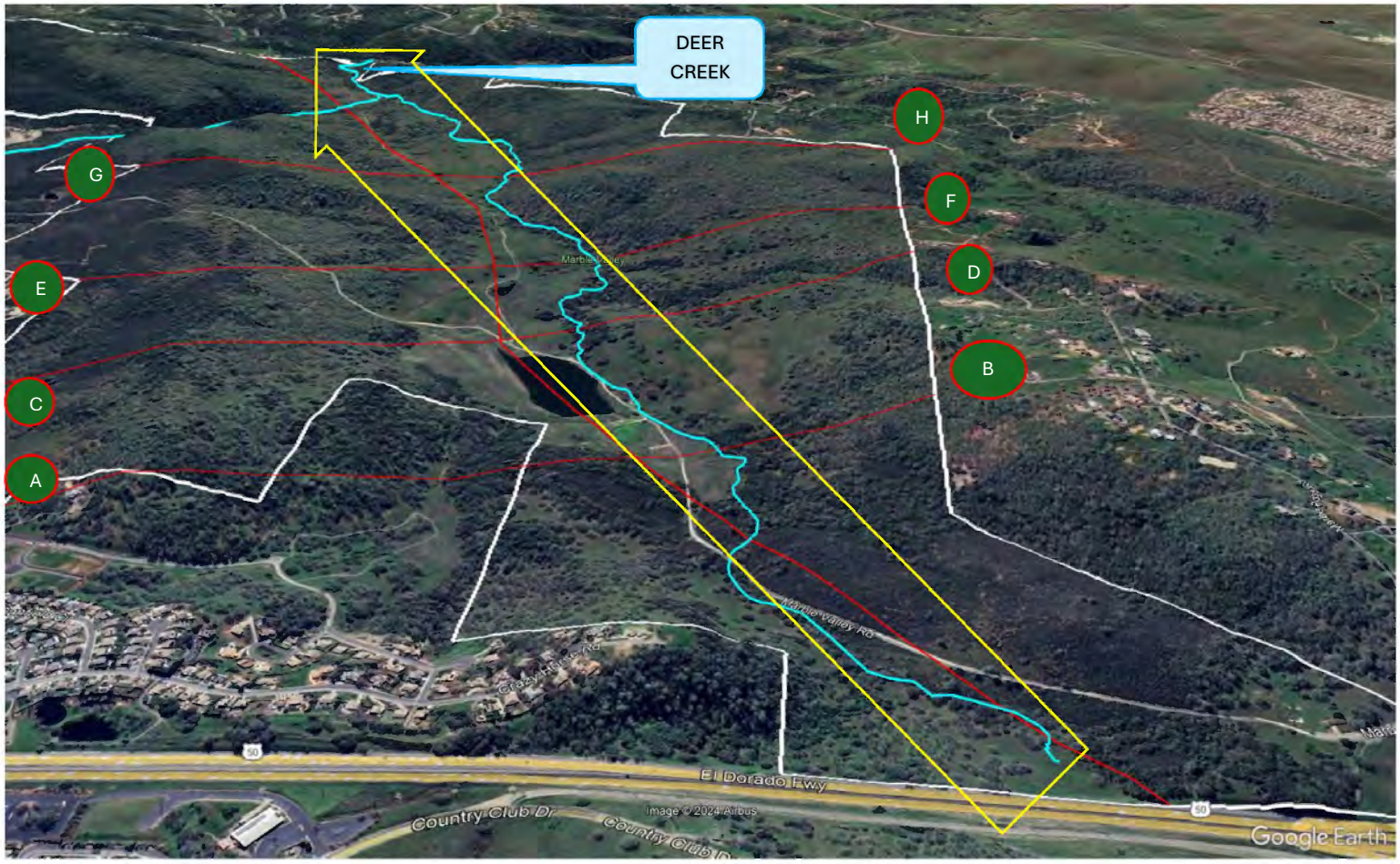
By Alastair Dunn

Marble Valley: North > South profile (below)

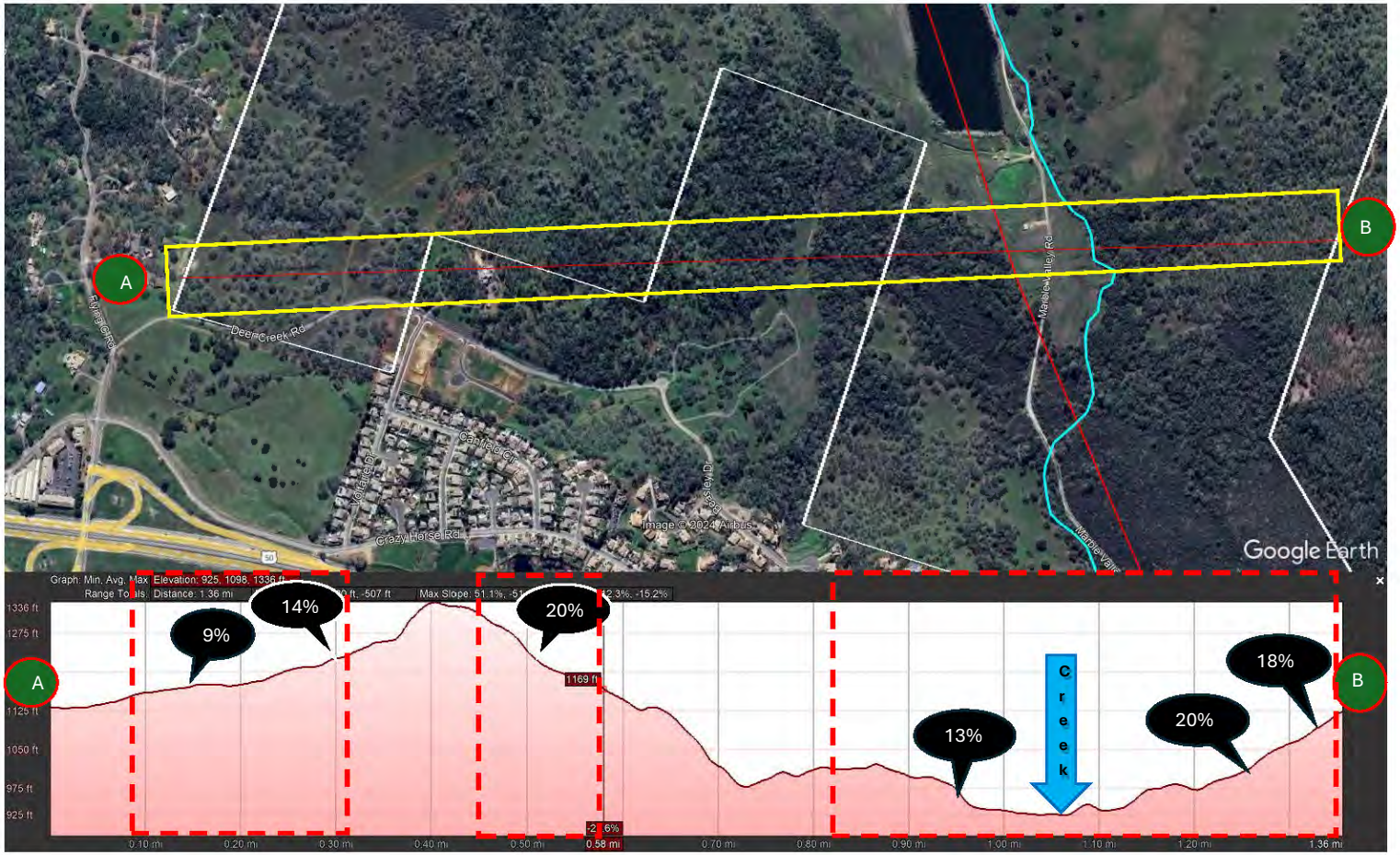


Overall, the valley has a 2.6% slope towards the south at Deer Creek.

Marble Valley terrain looking south with cross sections



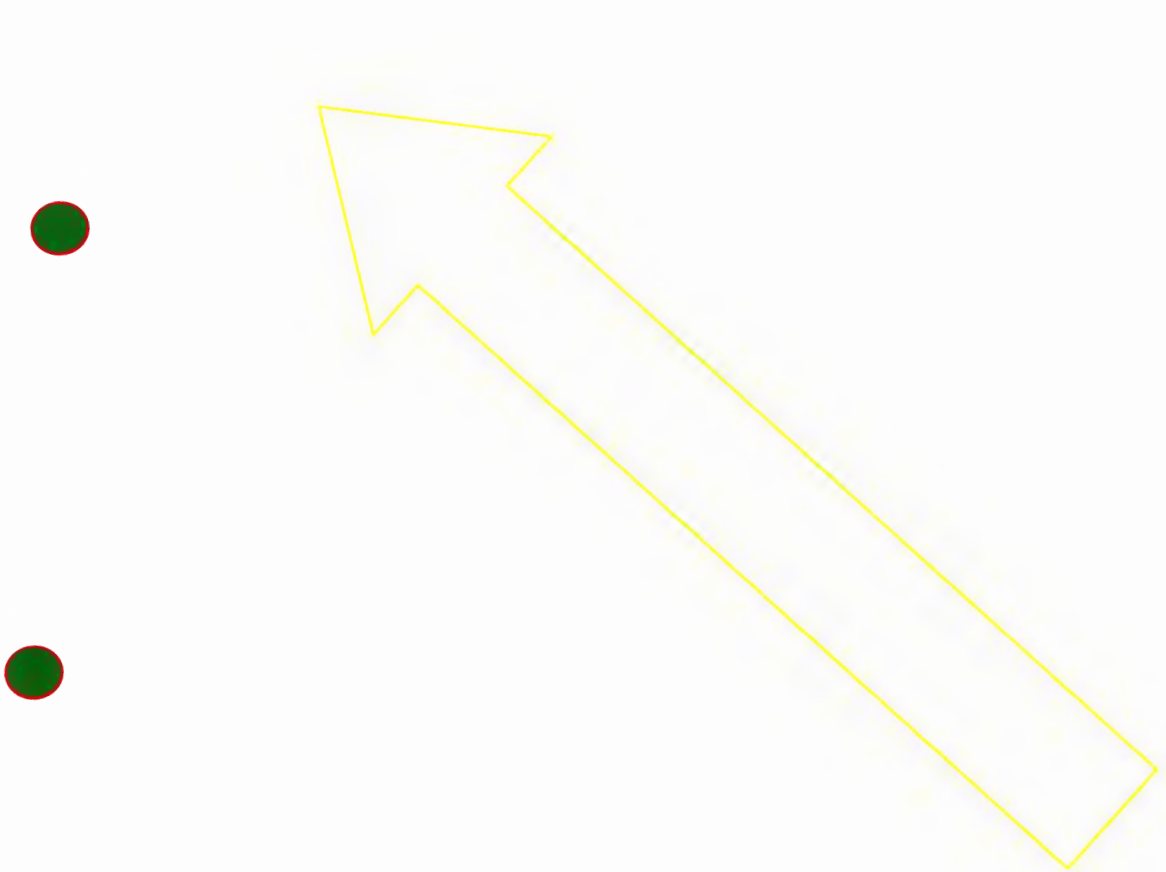
Cross section A>B



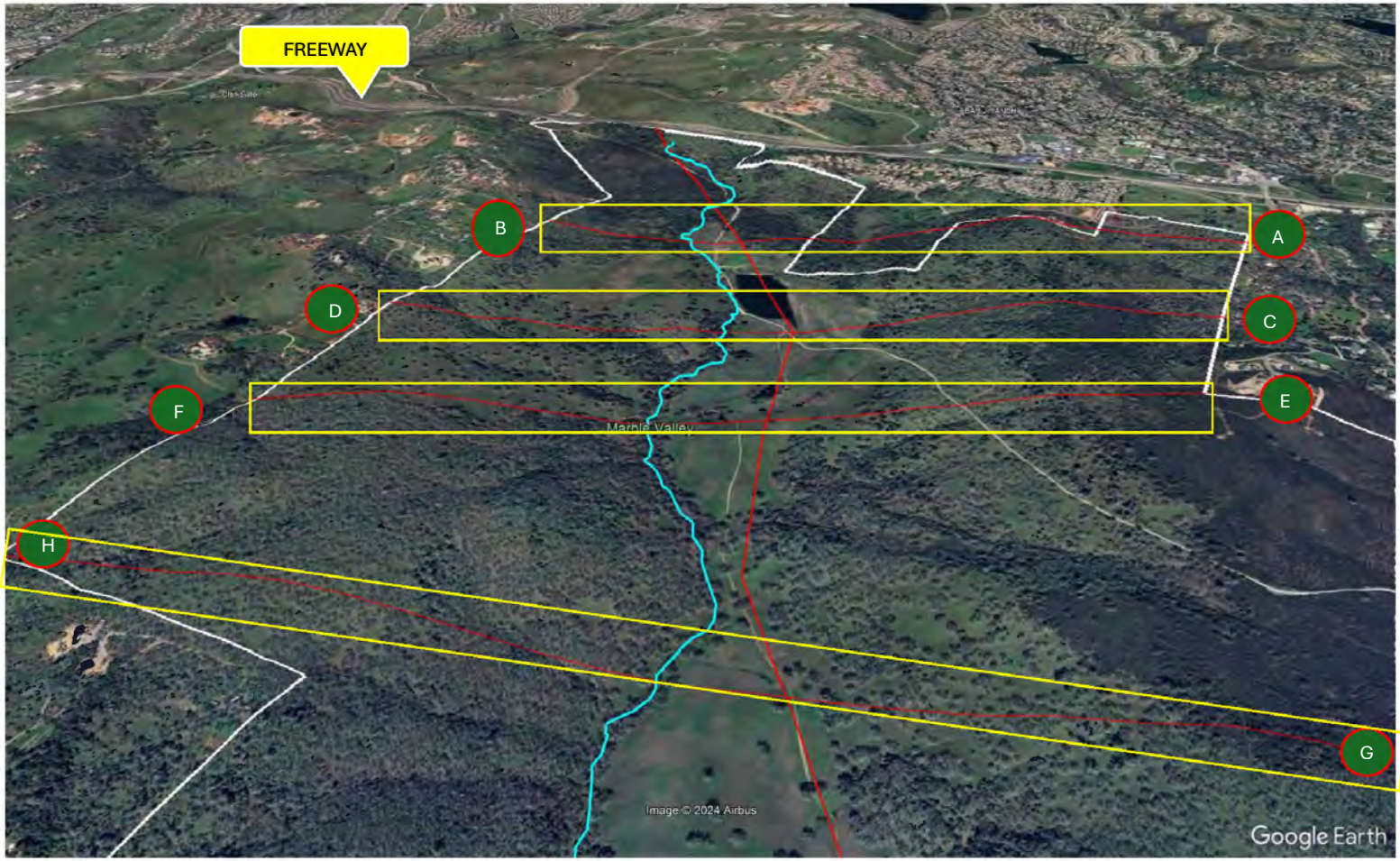
Note dashed line delimits the property boundaries

ALL OTHER CROSS SECTIONS ARE VIEWED FROM SOUTH TOWARDS THE NORT

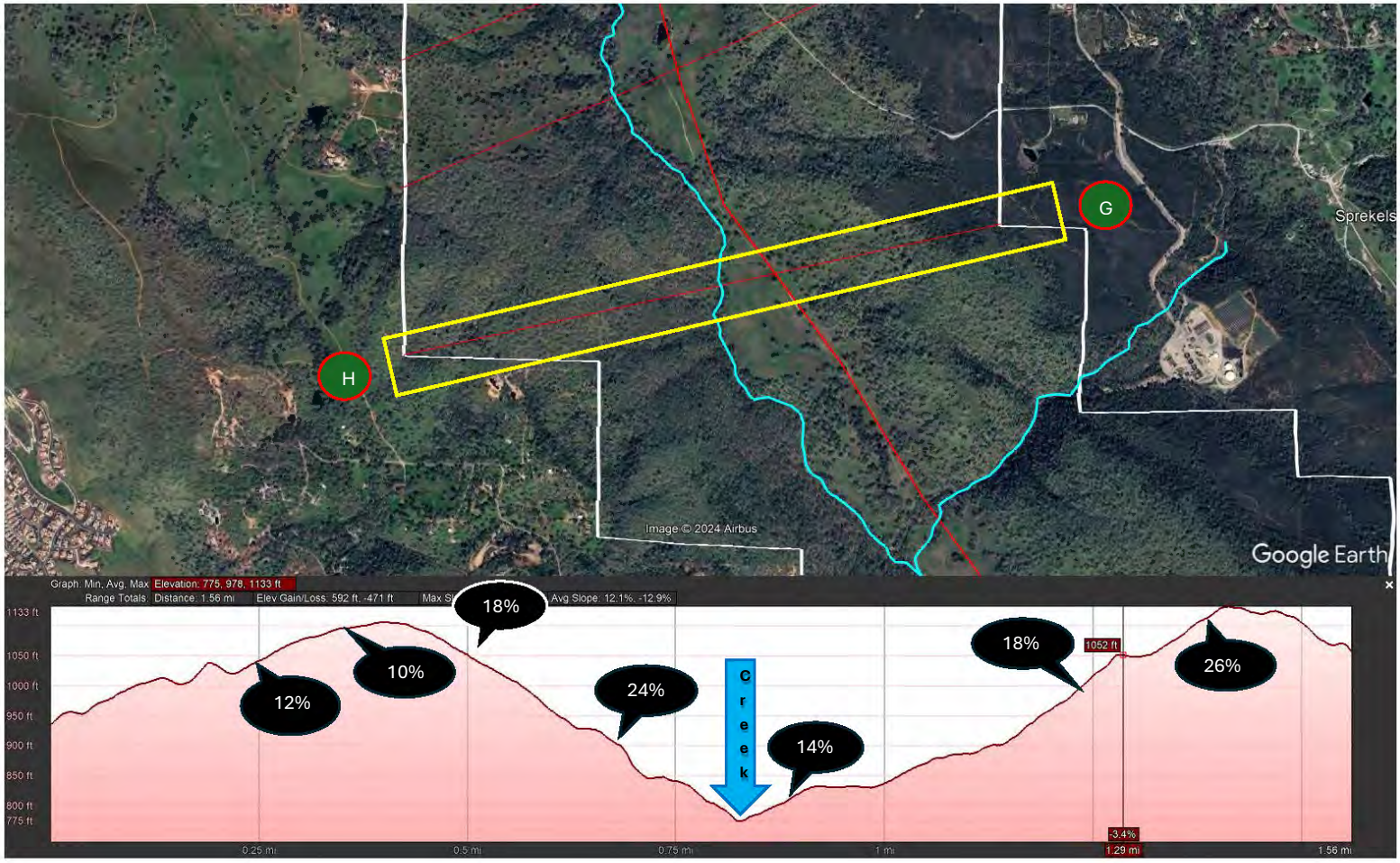
... because Google earth would only allow the cross sections that way to coincide with the property boundaries.



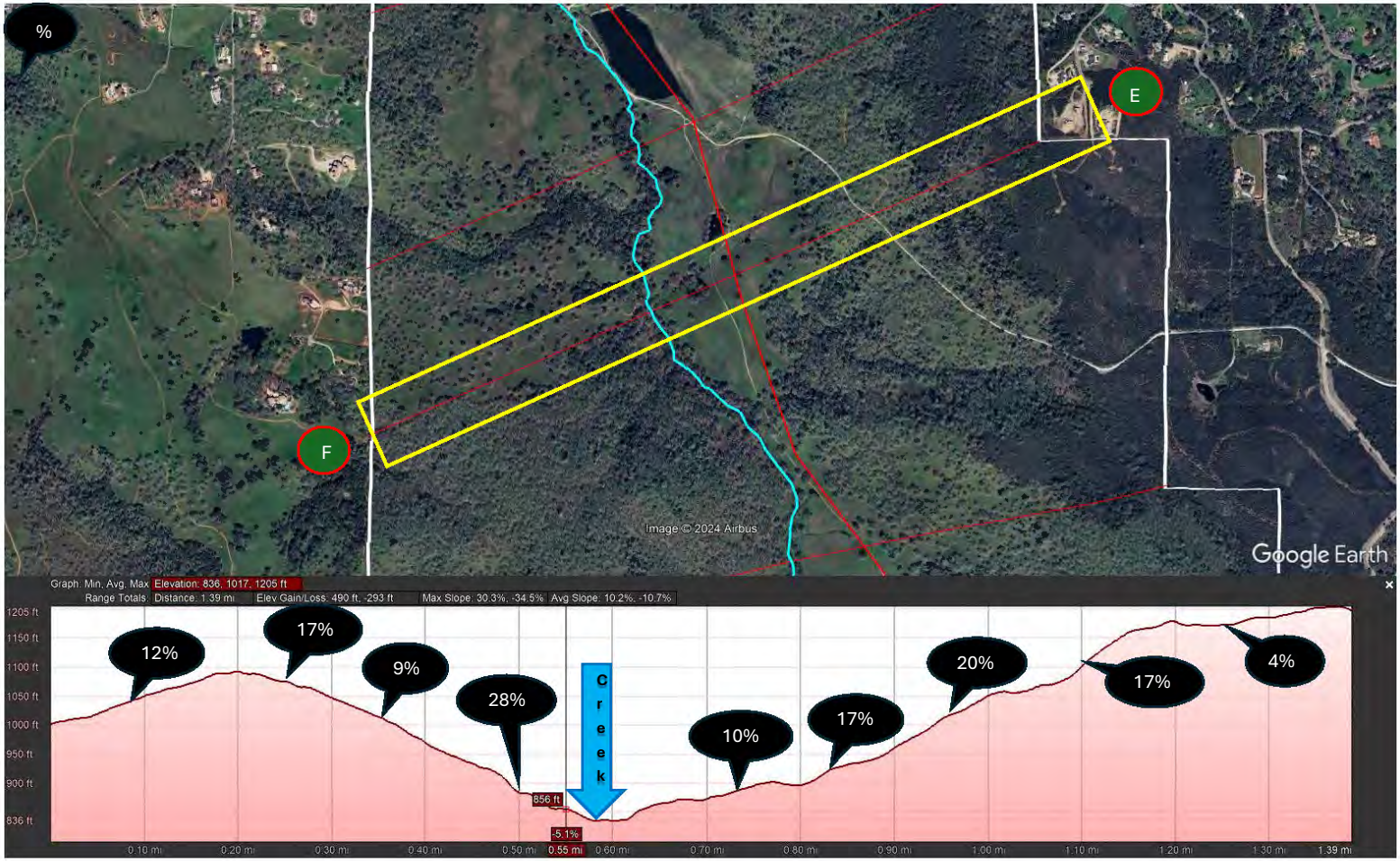
Cross sections taken



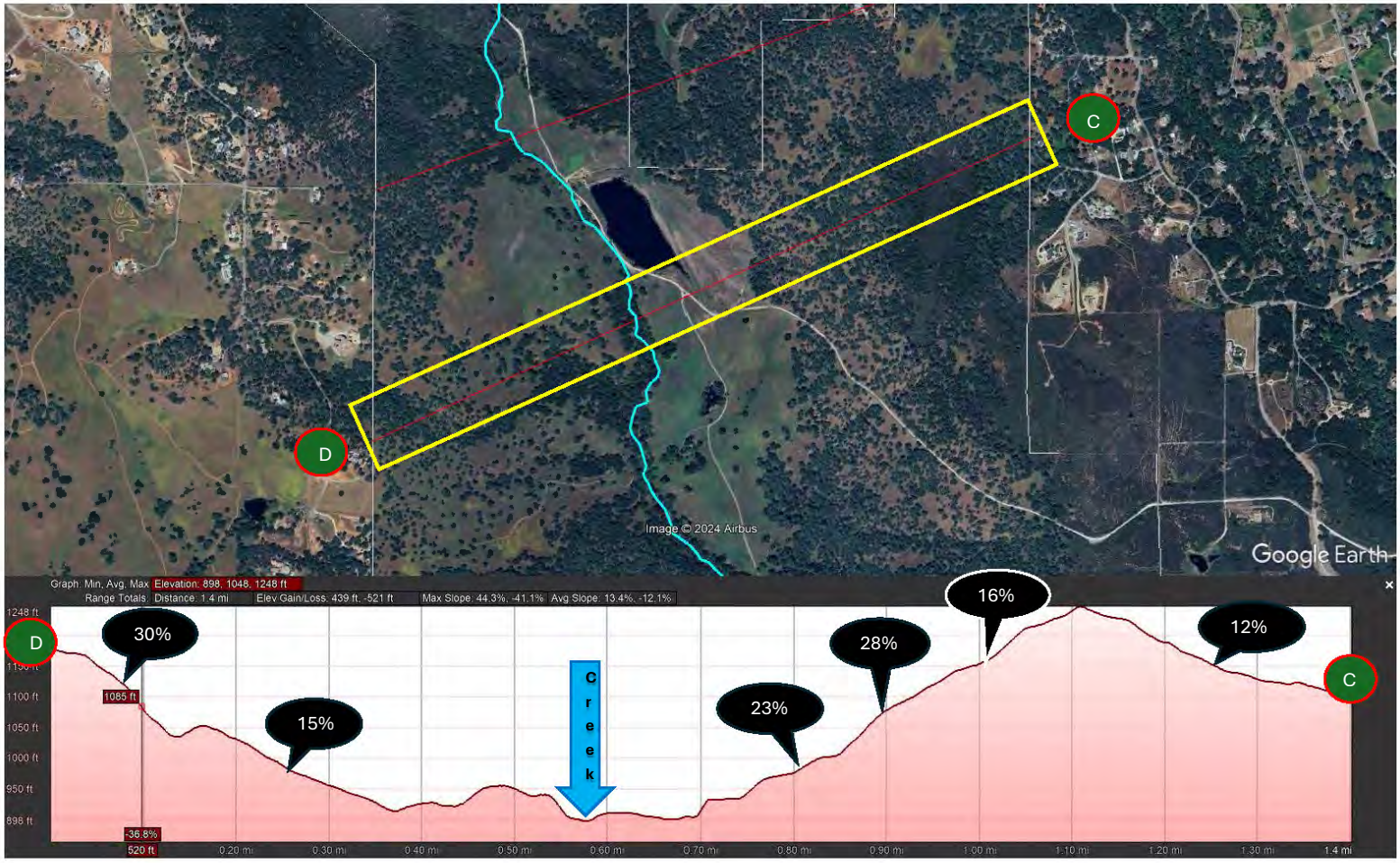
Cross Section G > H



Cross Section E > F



Cross Section C > D



Addendum

The criteria below were taken from published sources to define their “percentage (%) slope”.

Slope Suitability for Urban Development: Slopes Suitable for Development by Land Use Type

D use and	Suitability Rating	Residential	Commercial	Industrial Park
Slight	Optimum	0–6%	0–6%	0–2%
Moderate	**Satisfactory**	**6–12%**	**6–12%**	**2–6%**
Severe	**Marginal**	**12–18%**	**12–18%**	**6–12%**
Very Severe	Unsatisfactory	>18%	>18 %	>12 %

https://www.codepublishing.com/CA/Calimesa/html/Calimesa18/Calimesa1855.html#18.55.040

Adapted from Keifer, Ralph W. "Terrain Analysis for Metropolitan Fringe Area Planning" Journal of Urban Planning Division, Proceedings of the American Society of Civil Engineers, December 1967.

Slope	Type I	Type II	Type III	Type IV
Maximum cross**	**Up to 20%**	**Up to 25%**	**Up to 30% over on approval of P.C.**	**Up to 40% over on approval of P.C.**
Area, average minimum	6,000 sq. '	10,000 sq. '	20,000 sq. '	40,000 sq. '
Width, average minimum	60 feet	80 feet	90 feet	100 feet
R. O.W. width	60' minimum	60' minimum	50' minimum	50' minimum
Pavement width	40' or two 20'	40' or two 18'	26' or two 18'	25'
R.O.W. width	50' or 56'	50'	50'	40'
Pavement width	36'	32'	26'	24'

https://www.planning.org/pas/reports/report126.htm

Hillside classifications.

Hillside classifications have been established to identify significant categories relative to hillside development. These categories have been classified in terms of average slope types with respect to different topography categories, as follows:

Slope	Type
0% – 15%*	Flat, gentle, rolling land
16% – 20%	Hillside
21% – 25%	Steep hillside
26% – 30%	Very steep hillside
31% – 45%	Mountainside terrain
46%+	Rugged mountainside terrain

A. Slopes of Zero to 15 Percent. Slopes of zero to 15 percent consist of flat, gentle, or rolling land

1. “Flat land” is defined as slopes of zero to five percent. Slopes of zero to five percent normally pose no major restriction to development
2. “Gentle land” is defined as slopes of six to 10 percent. Slopes of six to 10 percent are flexible as to local road orientation and site layout.
3. “Rolling land” is defined as slopes of 11 to 15 percent. Slopes of 11 to 15 percent are significantly affected in terms of road alignment in that roads will normally be required to parallel contours.

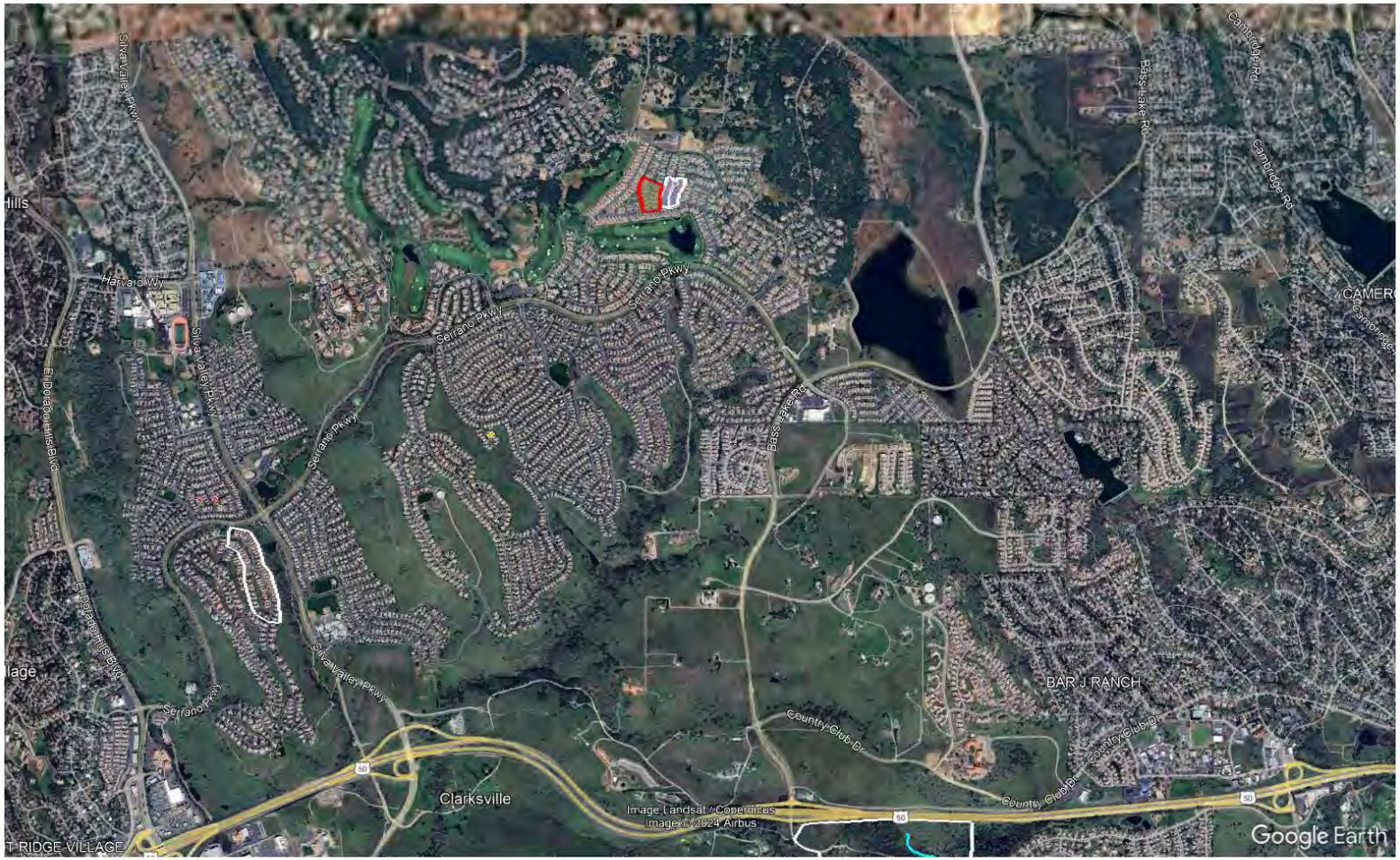
B. Slopes of 16 Percent and Above. Slopes of 16 percent and above consist of hillside and mountainside areas where developments in these areas are subject to the requirements of this chapter.

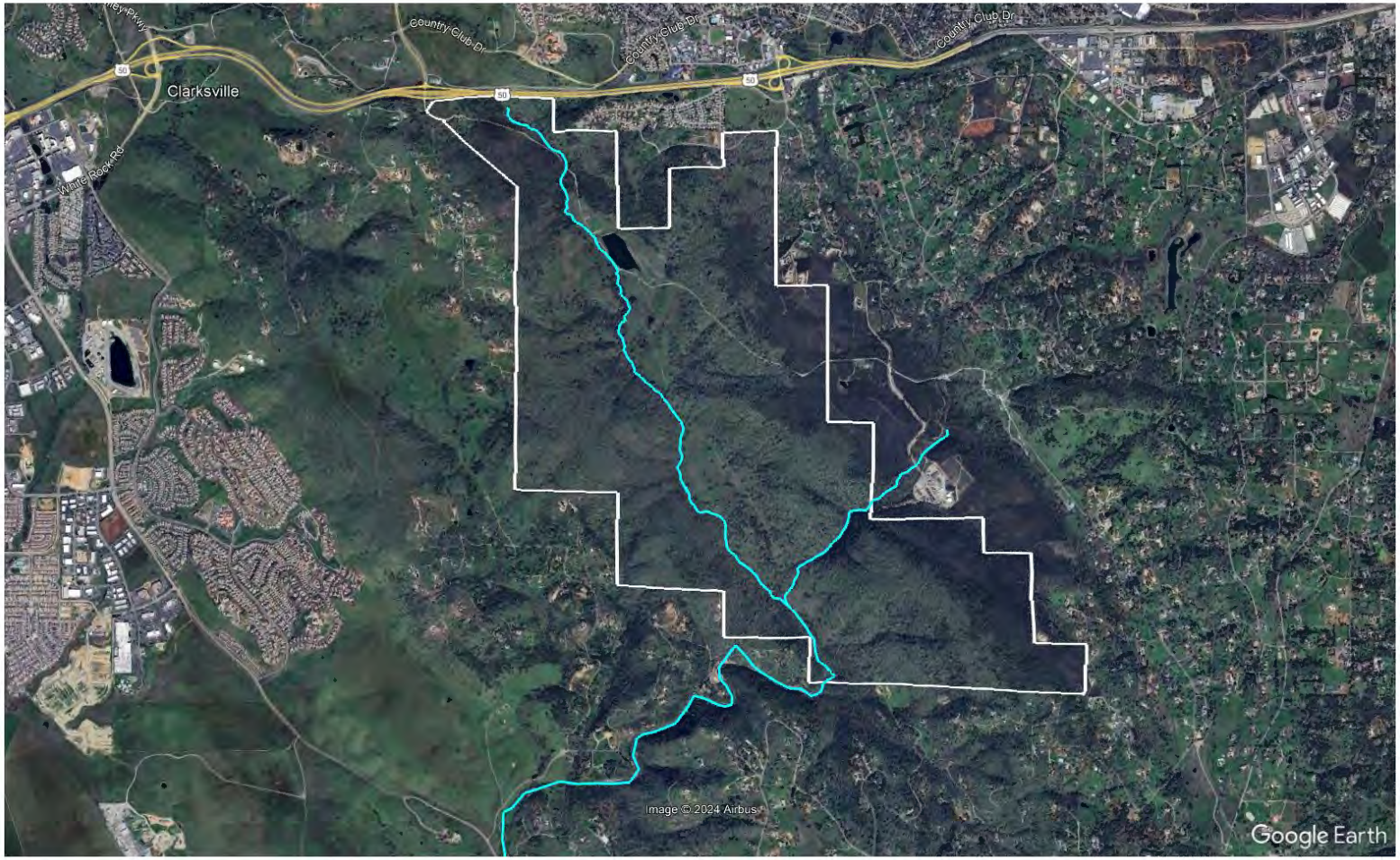
C. Slopes of 16 to 30 Percent. In hillside areas with slopes of 16 to 20 percent, 21 to 25 percent, or 26 to 30 percent, the required quantities of earthwork necessary for grading to create flat pads increase dramatically, as does the significance of view opportunities and visual prominence.

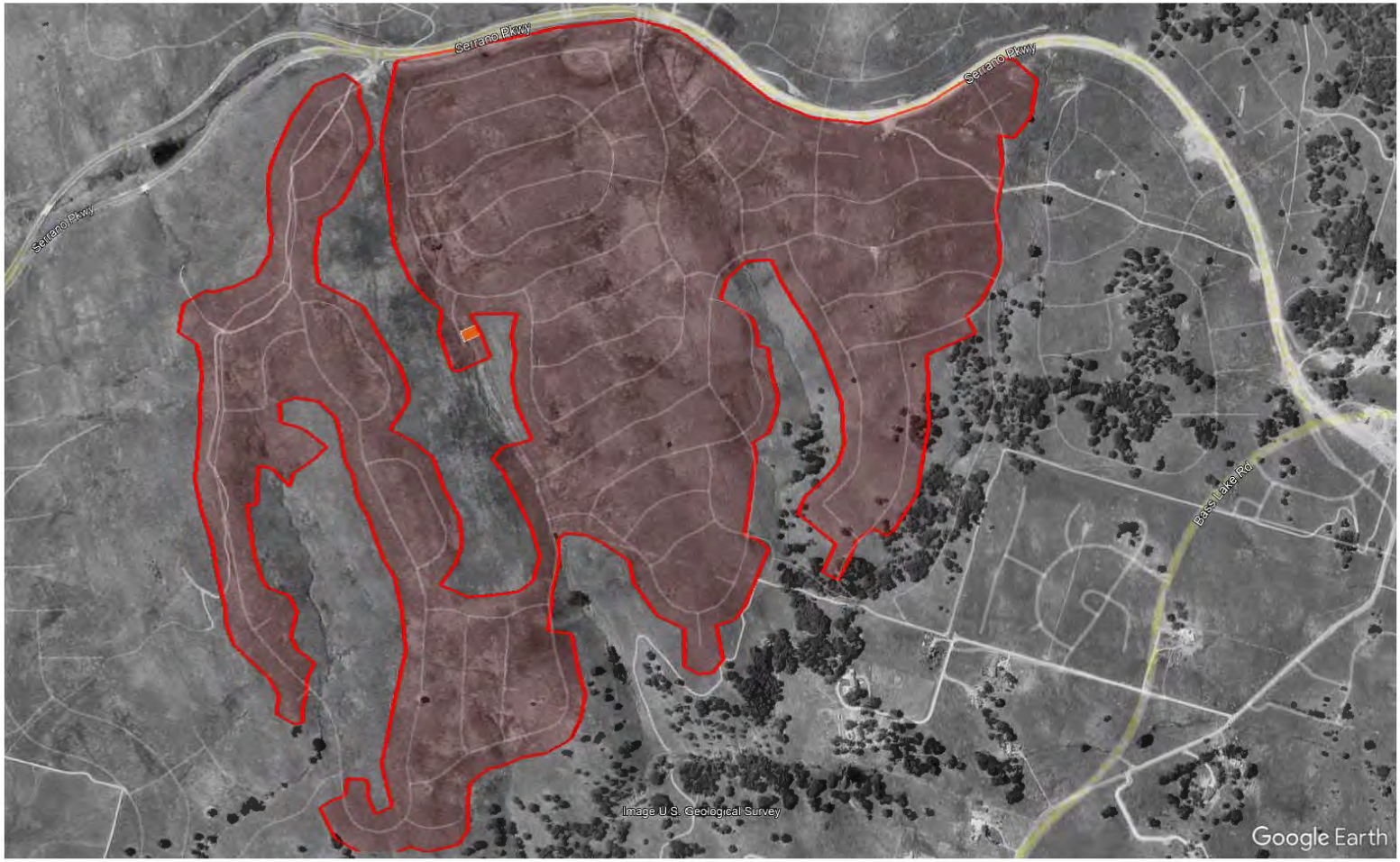
D. Development in areas with slopes of 16 percent and above shall require a hillside development review and include contour grading of the project site.

E. Slopes of 31 to 45 Percent. In mountainside areas with slopes of 31 to 45 percent, both access and the ability to create pads using 2:1 slopes are severely restricted.

F. Slopes of 46 Percent or Greater. In areas with average slopes of 46 percent or greater, development is discouraged.







Lime Rock Valley Specific Plan SP12-0001 public workshop August 8, 2024

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

El Dorado Hills Area Planning Advisory Committee <info@edhapac.org>

Tue 8/6/2024 8:22 PM

To:Planning Department <planning@edcgov.us>;Aurora M. Osbual <Aurora.Osbual@edcgov.us>;Andy Nevis <Andy.Nevis@edcgov.us>; Daniel Harkin <Daniel.Harkin@edcgov.us>;Lexi Boeger <Lexi.Boeger@edcgov.us>;Brandon Reinhardt <Brandon.Reinhardt@edcgov.us>; Bob Williams <Bob.Williams@edcgov.us>
Cc:tjwhitejd@gmail.com <tjwhitejd@gmail.com>;washburn_bew@yahoo.com <washburn_bew@yahoo.com>;jjrazzpub@sbcglobal.net <jjrazzpub@sbcglobal.net>;jdavey@daveygroup.com <jdavey@daveygroup.com>;g.steed@att.net <g.steed@att.net>; bjamaca@gmail.com <bjamaca@gmail.com>

12 attachments (11 MB)

EDH WATER - Supply + Demand Analysis -W-FULL.pdf; EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf; EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf; EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf; EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf; EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf; EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf; EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf; 2 EDH APAC Exhibit CPCSD-1 June 5-2024 CPCSD Response concerning Development Agreements for Marble Valley and Lime Rock.pdf; 1 EDH APAC Lime Rock Valley Specific Plan DEIR Public Comments.pdf;

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Hello,

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following comments, questions, and concerns in regard to the Public Workshop for the proposed Lime Rock Valley Specific Plan SP12-0001 Draft EIR in advance of your scheduled August 8, 2024 public meeting

The comments and questions have been collected from EDH APAC volunteer members, El Dorado Hills and Cameron Park residents, and residents of El Dorado County Rural Regions adjacent to the proposed Plan Area.

Included to begin our comments document is the following:

Initial Concerns

The Lime Rock Valley Specific Plan has been presented to the community as almost a co-project application along with the Village of Marble Valley Specific Plan. Many of the infrastructure elements, along with environmental mitigation proposed in the DEIRs for both projects' impacts seem to leverage the other project, or facilitate the elements of the other project. Recent community discussion, open house presentations, and review meetings in El Dorado Hills and in Cameron Park, have presented each project as part of a single cumulative review.

In the Lime Rock Valley DEIR it is suggested that where the project relies upon infrastructure, or environmental impact mitigation either provided by the Village of Marble Valley Specific Plan, or entangled between the projects, that in the event of the failure or delay of the Village of Marble Valley Specific Plan to gain adoption of the FEIR, along with project entitlements and approvals, that the Lime

> Rock Valley Specific Plan project will provide the infrastructure and environmental impact mitigation itself, in full. On its face, this concerns our volunteers and the community as to how the significantly smaller 800 unit Lime Rock Valley Specific Plan project can provide those project elements in regards to funding the infrastructure/environmental impact mitigation, and how that would impact the infrastructure/environmental impact mitigation timing, likely with considerable delays, as the Lime Rock Valley Specific Plan indicates a potential build out over 20-25 years, and the much larger 3200 unit Village of Marble Valley Specific Plan DEIR suggests a build out over 19 years.
>
> Even though it is the preference of EDH APAC that the projects be treated as separate and distinct applications for review and for study of each project DEIR individually, the DEIRs cite and rely upon each other in a manner that makes it difficult to separate the DEIRs for review. Therefore, EDH APAC offers our comments on the Lime Rock Valley Specific Plan DEIR relative to the manner in which both DEIRs have been presented, with entangled infrastructure, and environmental impact mitigation - in many instances, our comments, questions, and concerns submitted for the Village of Marble Valley Specific Plan DEIR are duplicated in our review of the Lime Rock Valley Specific Plan DEIR.

We also provided the following comments in our email message for the Village of Marble Valley Specific Plan Public Workshop - we repeat it here for the point of clarity:

> EDH APAC members would also like to share our concern with two large specific plan projects seemingly being processed as one project. Or belief is that these projects should be processed separately, with at least 30-60 days space between hearings. As the larger project, the Village of Marble Valley Specific Plan should be processed first, as many of the infrastructure and mitigations proposed in the VMVSP project are included as infrastructure elements and mitigation actions for the Lime Rock Valley Specific Plan. Two Specific Plan applications, two projects, two hearings.

ATTACHMENTS

ExhibitW-FULL	EDH WATER - Supply + Demand Analysis -W-FULL.pdf
ExhibitW1	EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf
ExhibitW2	EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf
ExhibitW3	EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf
ExhibitW4	EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf
ExhibitW5	EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf
ExhibitW6	EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf
ExhibitW7	EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf

ExhibitW8	EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf
Exhibit A-Dunn1	EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf
EDH APAC Exhibit CPCSD-1 June 5-2024 CPCSD	2 EDH APAC Exhibit CPCSD-1 June 5-2024 CPCSD Response concerning Development Agreements for Marble Valley and Lime Rock.pdf
EDH APAC LRVSP DEIR COMMENTS	1 EDH APAC Lime Rock Valley Specific Plan DEIR Public Comments

Respectfully,
John Davey
Chair
El Dorado Hills Area Planning Advisory Committee

1021 Harvard Way
El Dorado Hills CA 95762
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info@edhapac.org
916 936-3824

INTERNAL MEMORANDUM

To: John Davy, Chairman, El Dorado Hills APAC
From: Alastair, APAC voting member.
Subject: Marble Valley – Water Availability

Purpose
The purpose of this memorandum to EDH-APAC is to:

a) Examine the documentation prepared for the Village of Marble Valley Specific Plan Draft Environmental Impact Report May 2024 regarding the supply and demand of potable water for the project,
b) Review the EID documents asserting the sufficiency, availability and sustainability of water for projects in the El Dorado Hills (EDH) area, and
c) Present an analysis of EID data tables referring to the supply and demand of water in El Dorado Hills (EDH) area.

The ensuing document is prepared for El Dorado Hills Area Planning Council (APAC) for their consideration in commenting on the Marble Valley DEIR. As such it is a personal and informal memorandum and not presented as a formal commissioned document.

Foreword
I apologize in advance for the document's length, detail and extensive use of tables and graphs to qualify the points I wish to underscore. The following documents were reviewed:

- DEIR, Water Supply Assessment, Tully & Young, October (2021)
- Valley of Marble Valley Specific Plan, DEIR, May,2024: Other Considerations, Impact Analysis.
- BAE Memorandum, November 2023
- EID's Uban Water Master Plan 2020, Chapters: 2 Water Service and System Description, 3 Water Supply, 4 Water Use, 5 Water System Reliability.
- Tully & Young Memorandum, May 2014 (19-1670 G 216 of 360)
- El Dorado Water Supply Assessment for Central El Dorado Specific Plan, August 2013.

The Marble Valley DEIR document constantly refers to past EID studies now between 11 and 5 years old, which to my mind brings into question the validity of the statements made in the DEIR itself.

On the 11th, June last in the Planning Department's presentation in Cameron Park of Marble Valley and Lime Rock Valley, the proponents' leaflets on Water Supply said: "Based on these estimates from the EID's Urban Water Management Plan (UWMP-2020) there would be sufficient water supply for the proposed project, as well as other planned developments". It is that assertion I wish to qualify in this document.

Methodology
I attempted to reconstruct the many tables presented by EID throughout the documents into Excel tables to clearly show both historical (2015-2020) and projected (2020-2040) data so that one may quantify the basis of the assertions made as to adequacy of water availability for future projects in EDH.

All data was taken from the referenced documents above. However, it was incredibly difficult to link the many tables referenced into a logical array. Accordingly, I had to make some assumptions to present an array of data from 2015 to 2040 in a logical manner.

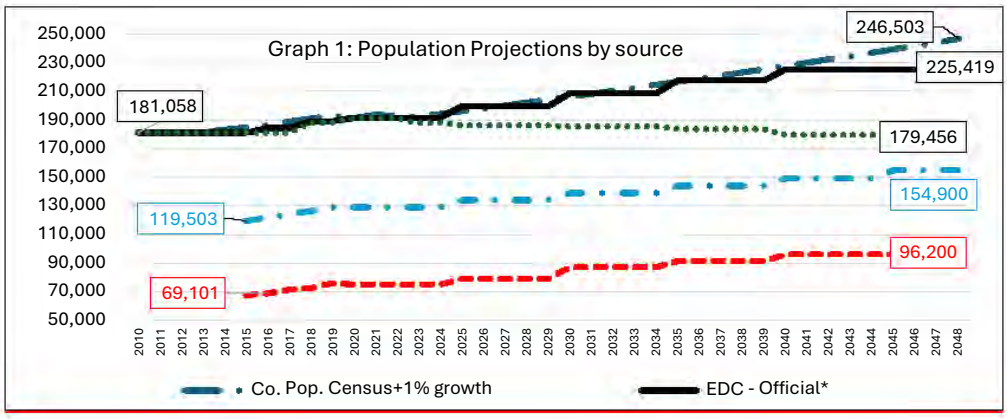
Particular attention was given to EDH's "pipeline*" of active and future projects undergoing the CEQA process in the County Planning website (projects in your area) to construct a nexus between residential units and acre feet of water to be supplied. See Exhibit A. (*Land developers generally refer to projects in the pipeline, to identify for planning purposes the number of residential units and commercial development for a given area).

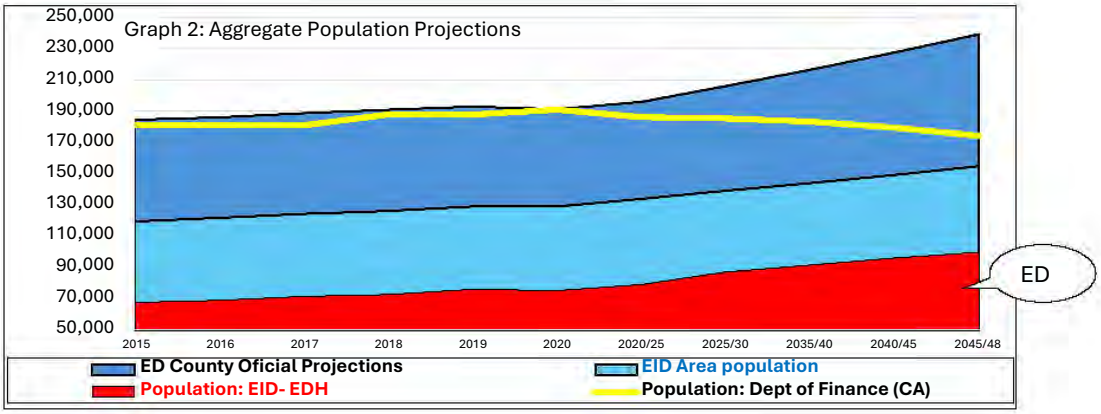
All EID documents reviewed from 2013 to 2024 were internally consistent and factually referenced. They are sound documents. The problem arose when attempting to combine the data in each into summary tables on both supply and demand of water. This data is presented in Exhibit 1 > 6.

SECTION ONE - WATER DEMAND

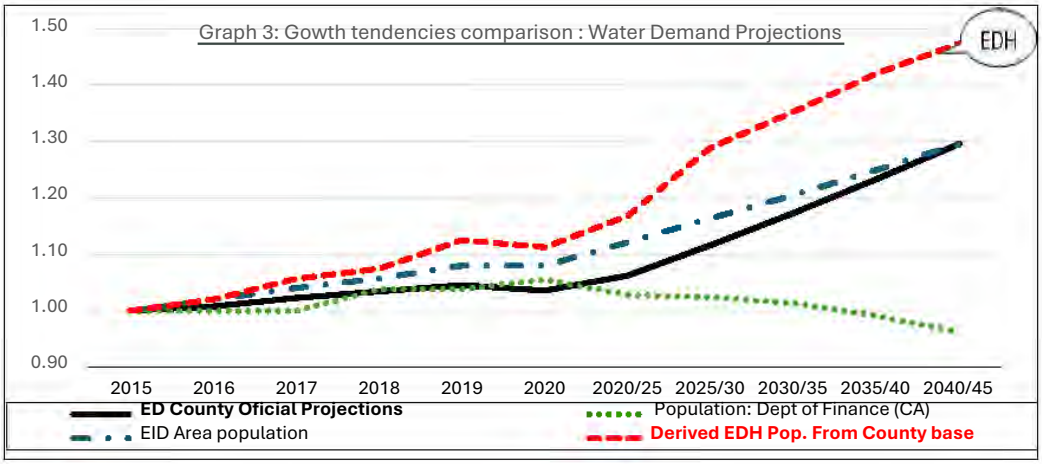
Population

In general terms, the demand for water is said to be based on population growth for El Dorado County. The graph below gives the population – historic and projected - for each area within the County.



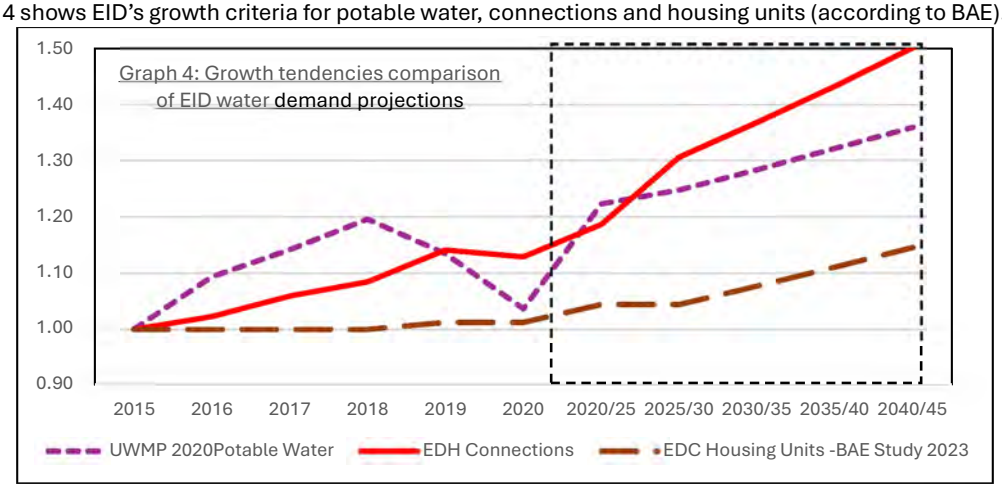


In projecting demand, it is necessary to measure the tendency (of growth) for each area referenced with base 100=2015 .....

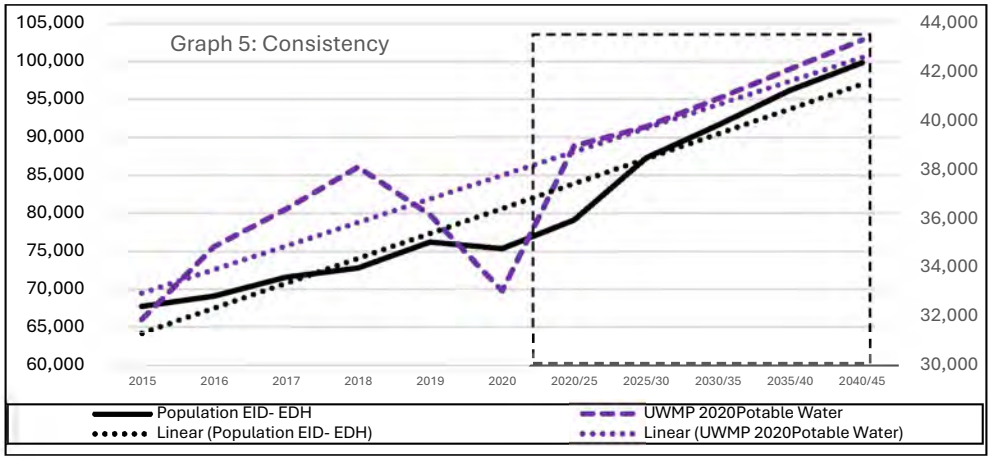


One should note that given County population data, EDH is to grow at a much faster rate than other areas. It is this projection I use in determining EDH area's growth in residential units.

Graph 4 shows EID's growth criteria for potable water, connections and housing units (according to BAE).



By visual inspection – given that both graphs 3 & 4 are on the same base 1.00 scale -one may conclude that, depending on what projection is taken, the resulting prediction shall be different. Fortunately, one set of data that - visually – gives one comfort, as indicated in graph 5. Both the EID "official" population projection and the UWMP potable demand projection have a similar slope.

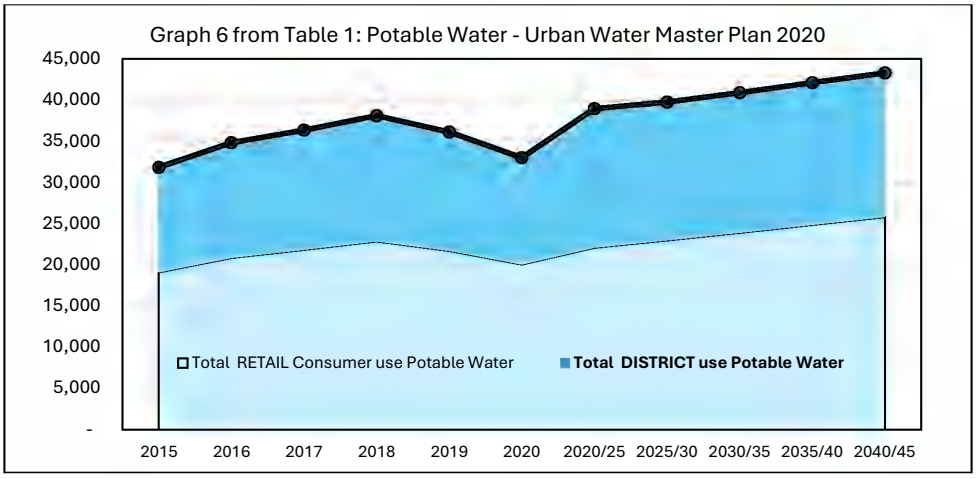


UWMP 2020 Projections: Table 1

Urban Water Master Plan 2020	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
EDH Consumer use Potable Water	9,570	10,197	11,099	11,385	11,078	12,220					
Weast + East service areas	9,544	10,675	10,743	11,472	10,635	7,850					
Total Retail Consumer use Potable W	**19,114**	**20,872**	**21,842**	**22,857**	**21,713**	**20,070**	**22,110**	**23,010**	**23,910**	**24,880**	**25,820**
City Pvill+ditc+other+recycle	1,830	2,047	2,060	2,200	2,039	1,505	4,240	4,240	4,240	4,240	4,240
Other+Ag.potb.+Loss	10,919	11,923	12,477	13,057	12,403	11,465	12,630	12,520	12,770	13,010	13,260
al DISTRICT use Potable Water	**31,863**	**34,842**	**36,379**	**38,114**	**36,156**	**33,040**	**38,980**	**39,770**	**40,920**	**42,130**	**43,320**

This table is a composite of several EID tables in the UWMP 2020

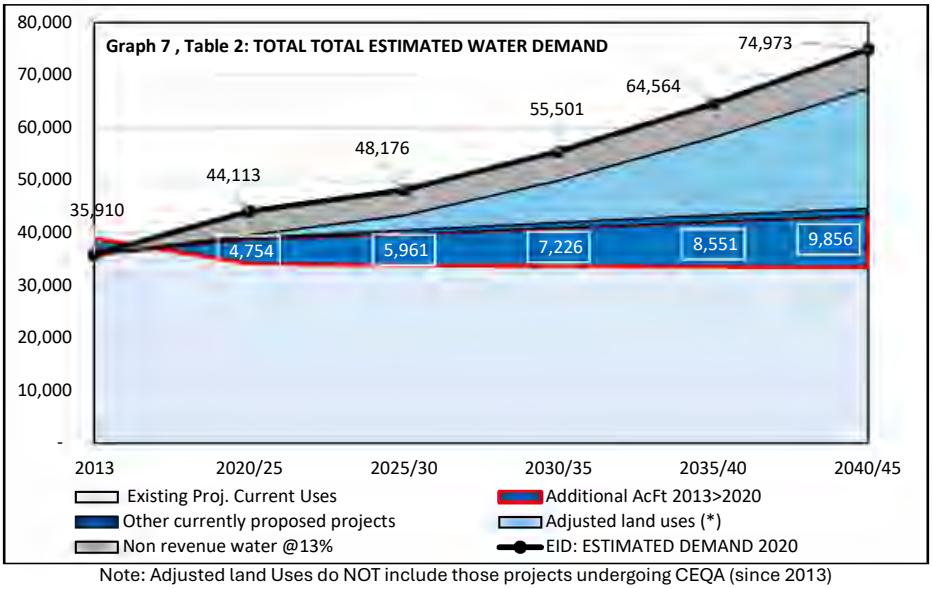
Graph 6 below is comprised of above data lines: Total Retail Consumer Potable Water (61% of total in 2020) and Total District Potable Water to give EIDs aggregate potable water demand.



EID's Projected Aggregate Demand - Table 2 in ac. ft.

Water Supply Asst Table 3-2(2013)	(FINAL) ESTIMATED WATER DEMAND					
Table 3-1, pg 3-8	2013	2020/25	2025/30	2030/35	2035/40	2040/45
Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464
Other currently proposed projects	0	163	696	1,052	1,272	1,332
Adjusted land uses	0	514	2,853	7,975	14,718	22,830
Non revenue water @13%	0	4,528	4,857	5,554	6,444	7,491
TOTAL Ac.Ft. DEMAND (2013)	**38,984**	**39,359**	**42,215**	**48,275**	**56,013**	**65,117**
Dif: UWMP 2020 (-) Demand 2013	(3,074)	4,754	5,961	7,226	8,551	9,856
EID: ESTIMATED DEMAND 2020	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**
EDH: ESTIMATED DEMAND 2020	**10,313**	**12,669**	**13,836**	**15,940**	**18,543**	**21,532**

Note, the table was constructed from information given by EID in various reports and aggregated by me. It is not an EID (or Tully) table.



Note: Adjusted land Uses do NOT include those projects undergoing CEQA (since 2013)

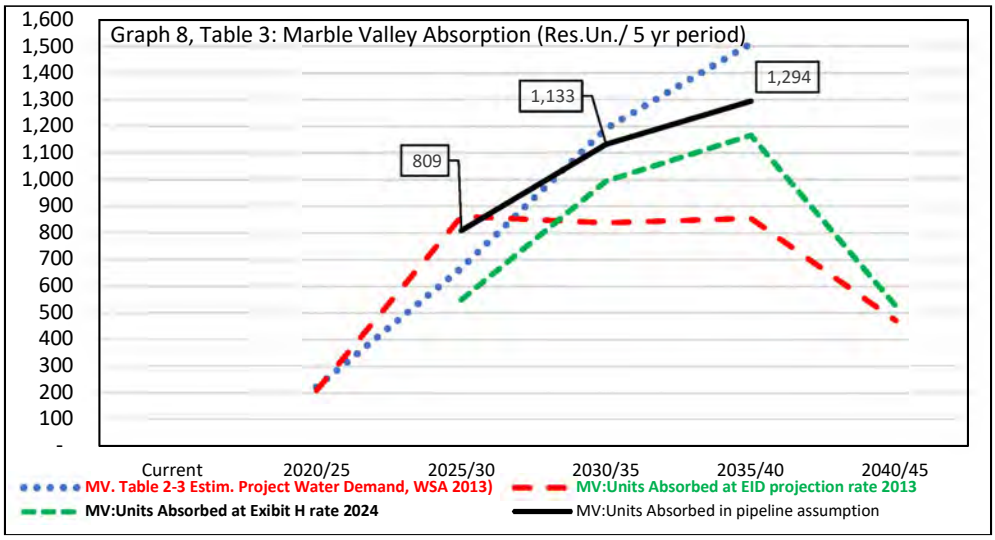
SECTION TWO: PIPELINE ANALYSIS

Marble Valley Absorptions

It appears that Marble Valley has projected – either stated in units or implied in acre feet- various absorptions rates as shown in Table 3 & Graph 8, below.

(*) Absorption refers to the number of units sold during a defined period (year) within a specific market area.)

Table 3 - Marble Valley	Current	2020/25	2025/30	2030/35	2035/40	2040/45	TOTAL
MV. Table 2-3 Estim. Project Water Demand, V		222	669	1,192	1,510		3,593
MV:Units Absorbed at EID projection rate 2013		210	862	838	855	471	3,236
MV:Units Absorbed at Exibit H rate 2024			549	995	1,166	526	3,236
MV:Units Absorbed in pipeline assumption			**809**	**1,133**	**1,294**		**3,236**



I point out these various Marble Valley absorptions to show the difference between EID's projections and mine for Marble Valley. The observation I make is the absorption changes over time over eleven years. In short, I doubt that the projection in Exhibit H reflects Marble Valley LLC's expectations, because if true their IRR/ NPV would be very low. In short, Marble Valley's water demand should reflect their expected absorption based on a market study that would also predict EID's water demand expectations.

Projected Absorption in residential units (see Exhibit 7).

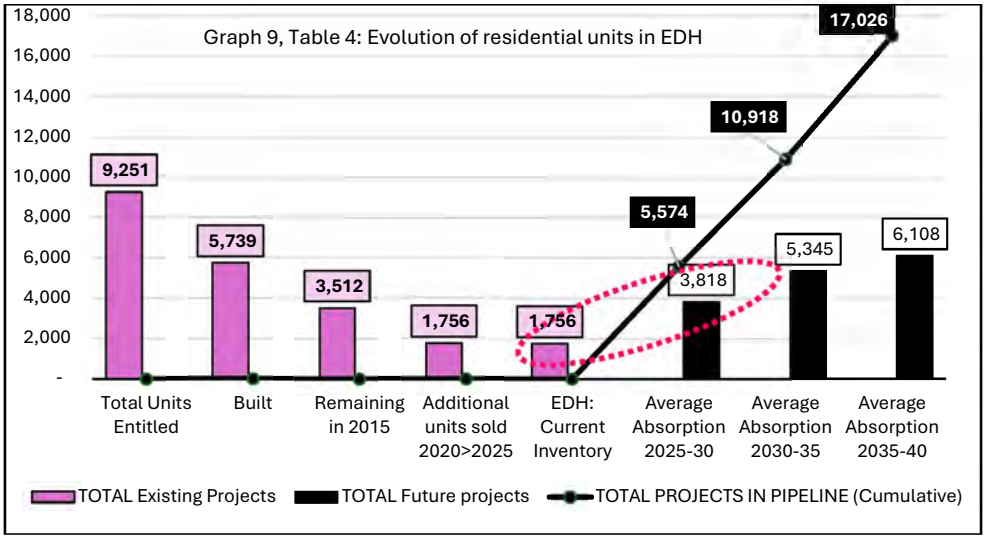
A critical difference between my pipeline projection for the EDH area and those stated, or implied, in EID Studies, is the absorption of residential units over time. EID projects project by population growth and translates that growth into units and acres to project acre feet of water. (Table 2-3 Estimated Project Water Demand, Water Supply Assessment 2013).

The key difference between EID's water demand projections and mine, is that my predictor variable for demand is in the residential unit. While EID's demand is predicted using an average factor of 0.674* ac. ft. per dwelling unit. (Note: I obtained this ratio based on *Table 2-3- Marble Valley, Water Supply Assessment 2013).

Table 8 and Graph 8 show the evolution of residential units in the EDH area. The short term 2025-30 period is critical due to the 1756 net units in 2020/25 plus 3818 units projected to be absorbed to give a significant inventory of 5574 units by 2030, presuming an annual sales rate of 1115 units a year. This rate suggests that each of the eighteen (18) projects in the EDH area must sell an average of 62 units per year; very aggressive. However, EID has no option other than to plan for this extraordinary pipeline.

Note: I have not added an estimate for commercial, industrial and landscape water demand that could be 30%* more to arrive at the Equivalent Dwelling Unit (EDU) that is used for projecting water demand.
(* Table 2-3- MV Water Supply Assessment 2013). The actual demand projection could be understated by as much as 30%. I chose not to add this factor because the forecast is dire enough as it is.

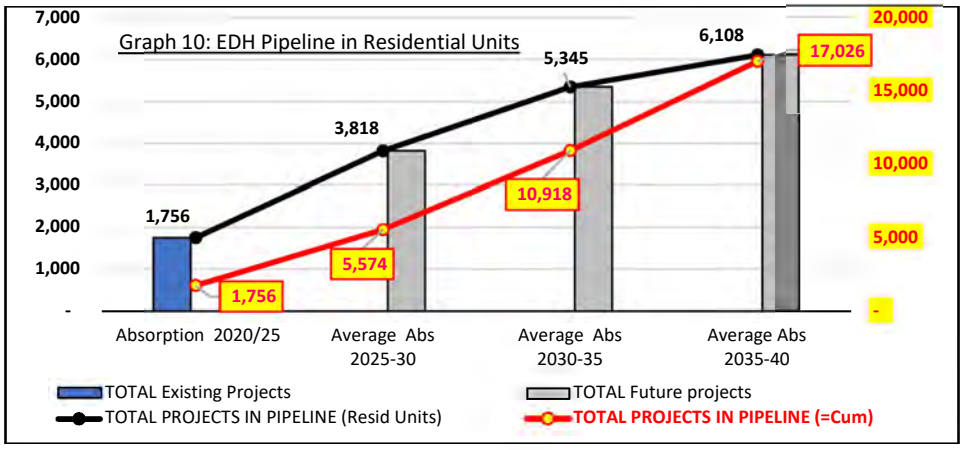
Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020>2025	EDH: Current Inventory	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	"PIPELINE" TOTAL RES. UNITS
TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**	-	-	-	**1,756**
TOTAL Future projects						3,818	5,345	6,108	15,270
TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**	**3,818**	**5,345**	**6,108**	**17,026**
TOTAL PROJECTS IN PIPELINE (Cumulative)						**5,574**	**10,918**	**17,026**	



The 2025/30 absorption period is particularly important for EID to determine with greater accuracy because it is "the" variable that determines – as we shall see – EDH's deficit of water supply in the short run.

Pipeline Analysis

In developer speak the number of residential units existing and approved for a given area is "the pipeline" and crucial to determine. This is one set of data EID has not undertaken. All EID studies refer to "projects in your area" (County Website) in the entitlement (CEQA) process. There is no attempt to establish the pipelines impact on supply of water. Note: It is the – red- "cumulative" pipeline used to compare with EID data.

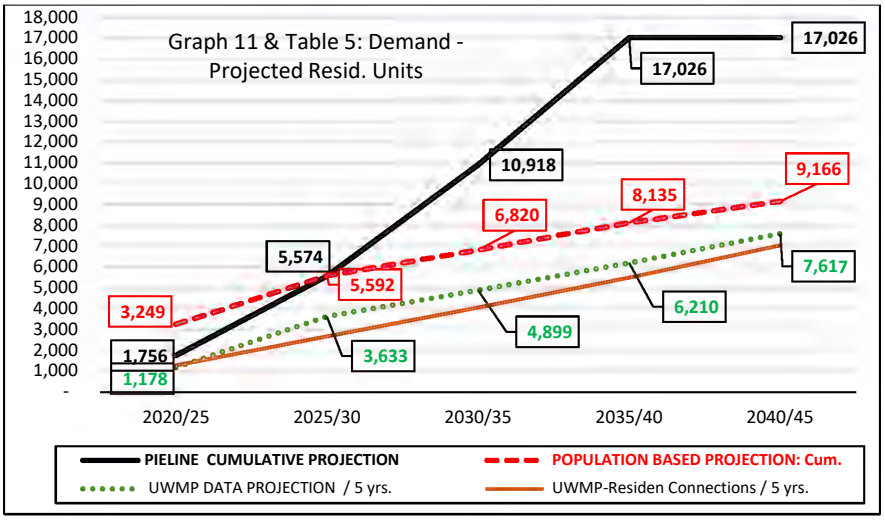


EDH Water Demand Projections

Using the same factor per dwelling unit as EID for UWMP data (0.674 ac. ft. per dwelling unit) one can compare the Projects in the Pipeline in the EID area in Table 5 and Graph 11 below.

Table 5: Cumulative Residential Units

PROJECTIONS : Cumulative	2020/25	2025/30	2030/35	2035/40	2040/45
PIELINE CUMULATIVE PROJECTION	1,756	5,574	10,918	17,026	17,026
POPULATION BASED PROJECTION: Cum.	3,249	5,592	6,820	8,135	9,166
UWMP DATA PROJECTION / 5 yrs.	1,178	3,633	4,899	6,210	7,617
UWMP-Residen Connections / 5 yrs.	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**



Note, the difference between my pipeline absorption and EID's is significant.

SECTION THREE: WATER SUPPLY

Exhibits 8>10 give the background to Table 10 below and highlights the water availability per period. EID and its consultants have updated the availability constantly depending on the infrastructure improvements made. However, I note that many supply figures (from 2015 to 2024) are couched with caveats. To make any water supply predictions for 2025/35 period this data must be assessed again today with realistic completion dates rather than caveats designed to cover oneself.

Table 6: Water Supply for EID Area

EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	**67,190**
Sub Total Planned	-	-	7,500	30,000	**37,500**
Recycled water	2,800	-	-	-	**2,800**
TOTAL Acre Feet	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**
CUMULATIVE SUPPLY	**25,800**	**52,990**	**77,490**	**107,490**	
EDH CUMULATIVE SUPPLY	**7,410**	**15,219**	**22,255**	**30,871**	

Note that the table is consistent with the totals given by EID in their public service infrastructure: EID MSR & SOI Update pages 7-16.

EDH Water Supply

Unfortunately, EID does not give – or I could not find– EDH's supply broken out from the above table.
I developed a ratio from EID's 2019 supply breakdown where I determined that EDH uses 28.7% of EID total supply. The table below summarizes my assumptions:

- EDH takes 42.1% of the EID total supply, Table 11.

	Tota EID		EDH	Other + P'ville	Est+West+ otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	**14,684**	**55.9%**	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	2,015	-	1,210
Sub Total Ag	**3,803**	14.5%	137	-	3,666
Sub Total P'ville + other	**4,571**	17.4%	-	4,571	-
Total Usage 2019	**26,283**	**100.0%**	**11,078**	**4,571**	**10,634**

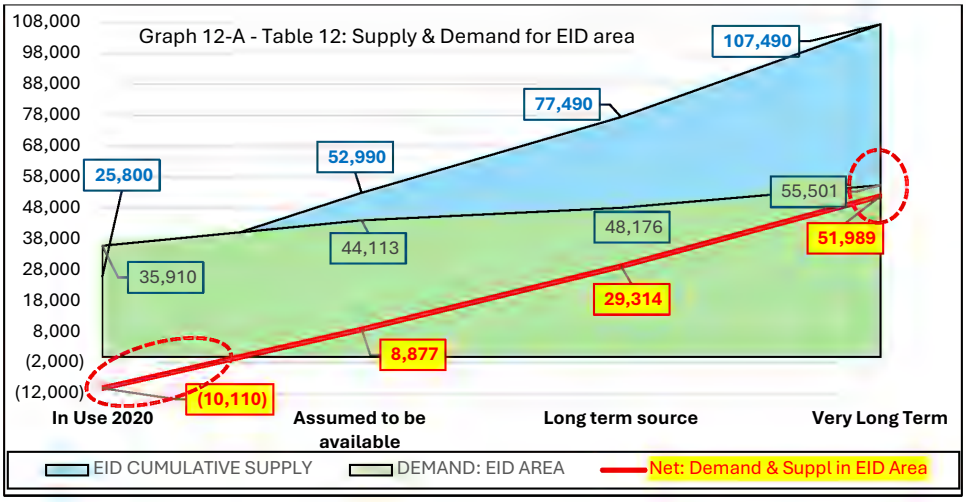
- Where (residential takes 55.9% of total plus 12.3% for commercial uses etc. to give EDH a total of 68.2%; that when multiplied by 42.1%-acre feet of water share, gives a **factor of 28.7%** representing EDH's share of total EID water supply.

I detail this assumption because it is critical in determining the supply and demand estimate for the EDH area. Neither Tully & Young nor the Proponent (Marble Valley LLC) make this distinction. It is only with this desegregation can anyone make the necessary **nexus** with EID's acre feet projections and the EDH pipeline. The positive supply availability statements made rely exclusively on EID's total supply to reach their availability supply statements regarding EDH. I maintain that this is erroneous because it is not that EID Area has a problem of water supply, but EDH as an area within EID that does.

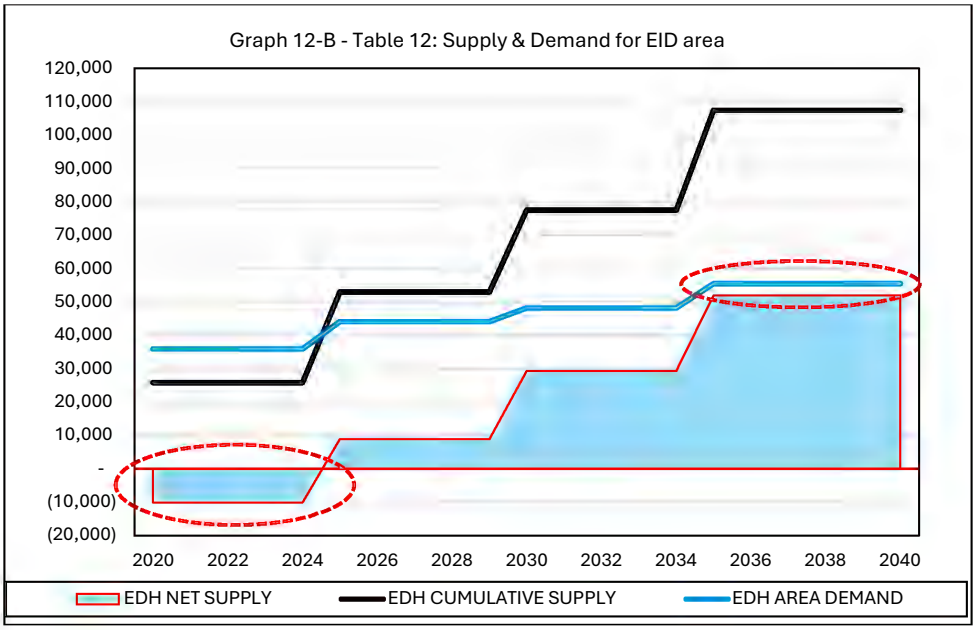
SECTION FOUR: SUPPLY & DEMAND

Supply & demand for the EID area (Table 12).

SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



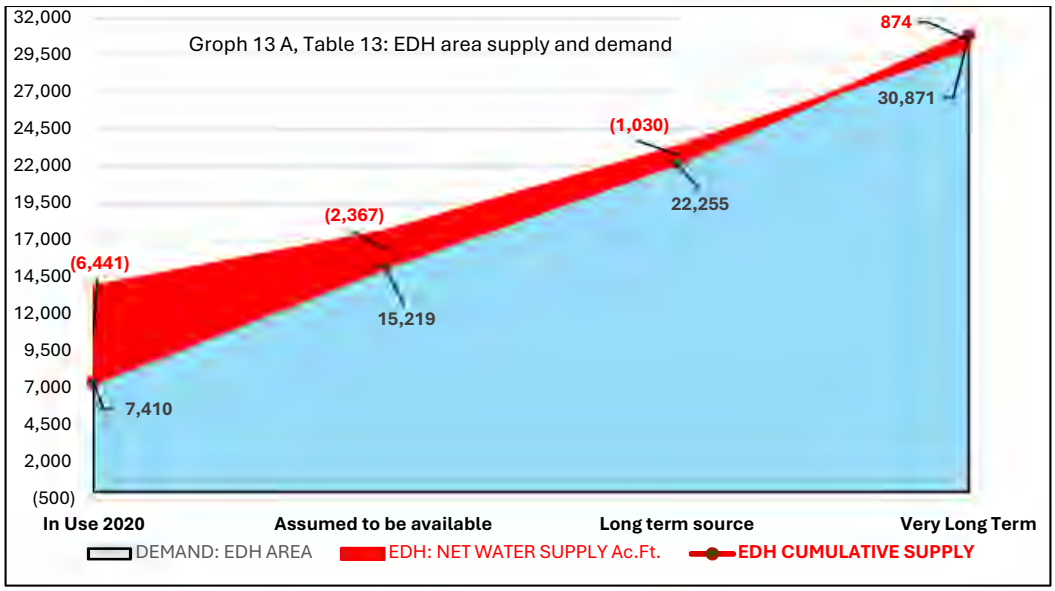
Maybe viewing the data in a different graph (12-B) shall illustrate EID's overall supply and demand situation better showing a small deficit in the 2020/25 period largely because of the net water demand of approved projects in the area. The data also shows that in the very long term the S&D balance is "thin".

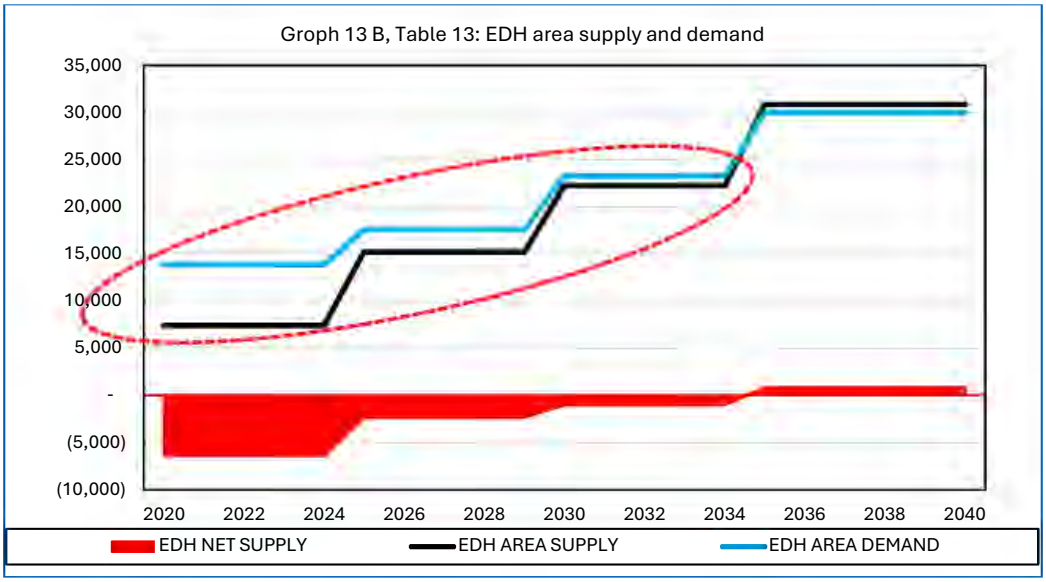


Conclusion: The EID area is not particularly threatened by a deficit of supply except possibly in the short run. However, this is largely dependent on the current net demand situation, that given the coarseness of the demand data derived requires better market data.

Supply & demand for the EDH area (Table 13)

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**





The data suggests that on a local - EDH -level the supply and demand situation appear in a deficit of supply, not only in the short run, but also in the medium and long term.

Sensitivity Analysis

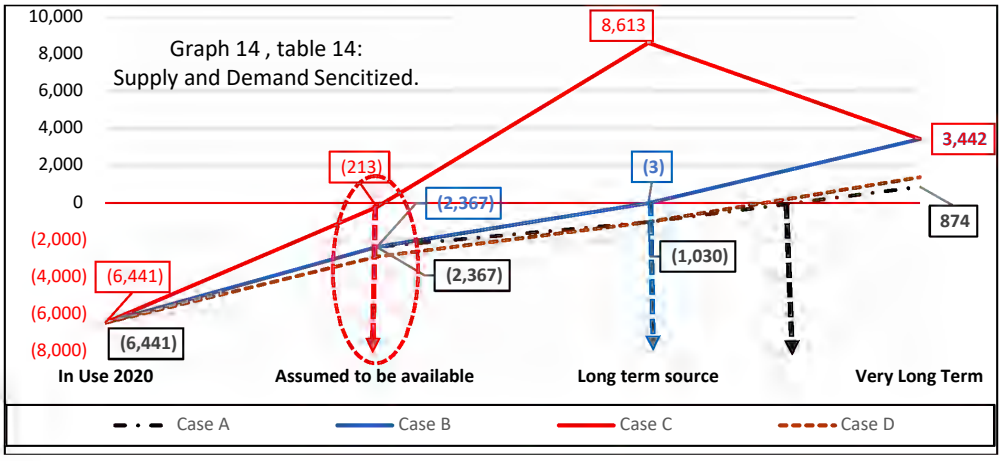
This study would be incomplete unless a sensitivity analysis were conducted on the two of the most sensitive variables to assess the severity of supply and demand imbalance:

- For water supply, which in this case is dependent on EID's capital investment program to secure the water right in Exhibits 8 & 9; and
- the predicted absorption of residential units in the EDH area – particularly in the short run.

Table 14: Variables sensitized (in red).

EDH Area	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	AcFt brought forward "assumed available)2025-30
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	(3)	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

I modified the absorption to benefit the overall availability of water and in one case brought forward Permit 2112 (Warren Act)17000 ac. Ft.+ CVP Contract- Fazio 7500 ac. Ft. Below the results graphed for the EDH area:



As the arrows show, no matter what, EDH has an imbalance of supply of water, particularly in the short run.

Summary:
Given the positive assertion that: "there is sufficient water to cover the needs of all EDH projects" in general and Marble Valley and Lime Rock Valley Specific Plans, in particular; is false.

The main issue of imbalance in the medium and long term is the certainty of water rights secured and capital improvements achieved, see Exhibit 8 & 9. It is beyond my ability and the scope of this work to make any qualifying remark other than to say; I am uncomfortable with the caveats made in memoranda qualifying EID's water availability. To quote one such caveat*: "The water rights applications and environmental analysis are still pending". And "the District cannot predict whether or when El Dorado Water Reliability Project may be approved". Indeed, the Tully and Young Memo of May 30, 2014, is rife with caveats that are now eleven ten years old.

Admittedly EID has achieved much since 2013, however, to continue to write long memos and outdated references in the Marble Valley DEIR underscoring the water rights secured and capital improvements made, it is imperative that a fresh review of these critical issues are factually reviewed, and if possible, qualified by a concrete probability (0 to 100) to give a measure of credibility as to water supply.
(*MSR & SOI Update (final) Public -Service & Infrastructure, page 7-16 in reference to 2010 EDWPA's environmental report).

SECTION FIVE: CONCLUSION

At this point, all I can say to EDH-APAC is: "Houston we have a problem". The fact that 17000 units are planned in the EDH area should give anyone reason to question the availability of water for such a fantastic, planned demand.

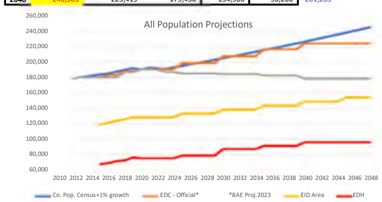
Throughout the DEIRs from 2013 to 2024 there are statements concluding that there "is" sufficient water to attend Marble Valley's (and Lime Rock's) potable water needs. I suggest that this is not true for the EDU area.

I sustain that APAC make the following comment on the Marble Valley DEIR 2024:

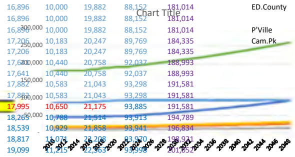
Regarding Appendix B - Consistency with the El Dorado County General Plan in objective 5.2.1.2 and 5.2.1.4:
The attached memorandum forwarded by an APAC Member suggests that:
- The Project Consistency statement made that there "is" sufficiency of water is not true.

And as a recommendation state:
- The County must insist that the proponent, Marble Valley LLC have a full and proper update of the SB 610 Water Supply Assessment of August 2013 by Tully & Young updated prior to proceeding with any hearing by the Planning Commission for such a project.

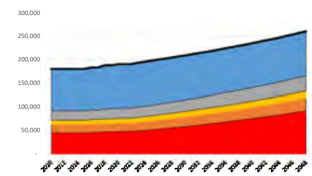
1980	85,812			119,503	67,729		20%	17,162
1990	125,995			119,503	67,729	125,995	21%	26,459
	1.000%							2.500%
	*BAE Projections based on Dept of Fin (nov 2023)			WUMP:Table 2-11 pa		2022 base + % Growth		
	Co. Pop. Censu	EDC - Official*	*BAE Proj.2023	EID Area	EDH	High Growth	EDH /EDCOff.	EDH-Census+ACD
2010	181,161	181,014	181,058			181,014		42,108
2011	180,963	181,014	181,058			181,014		43,563
2012	180,613	181,014	181,058			181,014		43,760
2013	181,529	181,014	181,058			181,014		44,206
2014	183,157	181,014	181,058			181,014		43,862
2015	184,627	181,014	181,058	119,503	67,729	181,014	37%	43,264
2016	186,027	184,335	181,058	121,853	69,101	184,335	37%	43,495
2017	188,793	184,335	181,058	124,316	71,555	184,335	39%	45,104
2018	190,925	188,993	187,940	126,316	72,779	188,993	39%	45,599
2019	193,057	188,993	187,940	129,056	76,199	188,993	40%	46,593
2020	191,245	**191,581**	**191,032**	**129,056**	**75,349**	191,581	39%	47,107
2021	193,704	191,581	191,032	129,056	75,349	191,581	39%	48,612
2022	192,787	191,581	191,032	129,056	75,349	191,581	39%	49,082
2023	192,215	191,581	188,131	129,056	75,349	194,789	39%	49,552
2024	194,137	191,581	188,131	129,056	75,349	196,834	39%	50,791
2025	196,079	199,521	186,186	**134,000**	79,100	198,921	40%	52,061
2026	198,039	199,521	186,186	134,000	79,100	201,052	40%	53,362
2027	200,020	199,521	186,186	134,000	79,100	203,228	40%	54,696
2028	202,020	199,521	186,186	134,000	79,100	205,450	40%	56,064
2029	204,040	199,521	186,186	134,000	79,100	207,718	40%	57,465
2030	206,080	**208,457**	**185,434**	**139,100**	**87,300**	210,035	42%	58,902
2031	208,141	208,457	185,434	139,100	87,300	212,400	42%	60,374
2032	210,223	208,457	185,434	139,100	87,300	214,816	42%	61,884
2033	212,325	208,457	185,434	139,100	87,300	217,283	42%	63,431
2034	214,448	208,457	185,434	139,100	87,300	219,802	42%	65,017
2035	216,593	**217,619**	**183,477**	**144,000**	91,600	222,375	42%	66,642
2036	218,759	217,619	183,477	144,000	91,600	225,003	42%	68,308
2037	220,946	217,619	183,477	144,000	91,600	227,686	42%	70,016
2038	223,156	217,619	183,477	144,000	91,600	230,427	42%	71,766
2039	225,387	217,619	183,477	144,000	91,600	233,226	42%	73,560
2040	227,641	**225,419**	**179,456**	**149,300**	96,200	236,086	43%	75,399
2041	229,917	225,419	179,456	149,300	96,200	239,006	43%	77,284
2042	232,217	225,419	179,456	149,300	96,200	241,989	43%	79,216
2043	234,539	225,419	179,456	149,300	96,200	245,036	43%	81,197
2044	236,884	225,419	179,456	149,300	96,200	248,149	43%	83,227
2045	239,253	225,419	179,456	**154,900**	96,200	251,329	43%	85,307
2046	241,646	225,419	179,456	154,900	96,200	254,577	43%	87,440
2047	244,062	225,419	179,456	154,900	96,200	257,895	43%	89,626
2048	246,503	225,419	179,456	154,900	96,200	261,285	43%	91,867



1980	17,162	8,010	4,740	9,425	46,474	85,812
1990	26,459	11,761	6,960	13,839	66,976	125,995
	2.50%	1.50%	1.30%	1.60%	0.03%	
Market Share >	25%	9.3%	5.5%	11.0%	base 2022	
	EDH	Cam.Pk	Pl'vill	Lk.Tahoe	Uninc.	Total
2010	46,085	16,896	10,000	19,882	88,152	181,014
2011	46,085	16,896	10,000	19,882	88,152	181,014
2012	46,085	16,896	10,000	19,882	88,152	181,014
2013	46,085	16,896	10,000	19,882	88,152	181,014
2014	46,085	16,896	10,000	19,882	88,152	181,014
2015	46,085	16,896	10,000	19,882	88,152	181,014
2016	46,930	17,206	10,183	20,247	89,769	184,335
2017	46,930	17,206	10,183	20,247	89,769	184,335
2018	48,116	17,641	10,440	20,758	92,037	188,993
2019	48,116	17,641	10,440	20,758	92,037	188,993
2020	48,775	17,882	10,583	21,043	93,298	191,581
2021	48,775	17,882	10,583	21,043	93,298	191,581
2022	49,082	17,995	10,650	21,175	93,885	191,581
2023	50,309	18,265	10,788	21,514	93,913	194,789
2024	51,567	18,539	10,929	21,858	93,941	196,834
2025	52,856	18,817	11,071	22,208	93,970	198,921
2026	54,177	19,099	11,215	22,363	93,998	201,052
2027	55,532	19,386	11,360	22,924	94,026	203,228
2028	56,920	19,677	11,508	23,291	94,054	205,450
2029	58,343	19,972	11,658	23,664	94,082	207,718
2030	59,802	20,271	11,809	24,042	94,111	210,035
2031	61,297	20,575	11,963	24,427	94,139	212,400
2032	62,829	20,884	12,118	24,818	94,167	214,816
2033	64,400	21,197	12,276	25,215	94,195	217,283
2034	66,010	21,515	12,435	25,618	94,224	219,802
2035	67,660	21,838	12,597	26,028	94,252	222,375
2036	69,352	22,165	12,761	26,444	94,280	225,003
2037	71,085	22,498	12,927	26,868	94,308	227,686
2038	72,863	22,835	13,095	27,297	94,337	230,427
2039	74,684	23,178	13,265	27,734	94,365	233,226
2040	76,551	23,526	13,438	28,178	94,393	236,086
2041	78,465	23,878	13,612	28,629	94,422	239,006
2042	80,427	24,237	13,789	29,087	94,450	241,989
2043	82,437	24,600	13,968	29,552	94,478	245,036
2044	84,498	24,969	14,150	30,025	94,507	248,149
2045	86,611	25,344	14,334	30,506	94,535	251,329
2046	88,776	25,724	14,520	30,994	94,563	254,577
2047	90,995	26,110	14,709	31,490	94,592	257,895
2048	93,270	26,501	14,900	31,993	94,620	261,285



	Yr 2022	
Lake Tahoe	21,175	11%
EDH	49,082	25%
Unicorp	192,787	100%
ED.County	192,787	100%
P'Ville	10,650	6%
Cam.Pk	17,995	9%



24-1388 Public Comment
PC Rcvd 08-07-24

DEMAND TABLES

		2020/25	2025/30	2030/35	2035/40	2040/45	
Population (eScal)	181,014	191,581	199,521	208,457	217,619	225,419	< Miscellaneous projections found
/yr 2013		38,380	39,010	39,640	40,270	40,930	< Miscellaneous projections found
TOTAL WATER DEMAND	38,984	39,500	42,937	49,560	57,870	67,295	< Miscellaneous projections found
UWMP 2020- Total Expected connections EID -Area		**42,935**	**46,948**	**49,111**	**50,944**	**53,073**	< Miscellaneous projections found

Table 2-1 page 2-3 **& T2-4 pg 2-13**

BAE Study | Connections | 23,358 | Table 2-1 page 2-3 & T2-4 pg 2-13

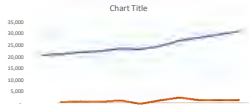
EDI 2021 Table 1-2+3 & Impact analysis table 3.12.13: 2024

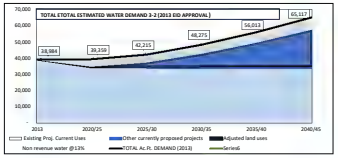
Urban Water Master Plan 2020	35,910	38,908	39,770	40,920	42,130	43,330

<T&Y: EDC- Impact analysis in EDHSP

	Urban Water Master Plan 2020	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45	
Ac.Ft.	EDH Consumer use Potable Water	9,570	10,197	11,099	11,385	11,078	12,220						Table 4-1+3 & EID 2020 page 4-4
	Wrest + East service areas	9,544	10,675	10,743	11,472	10,635	7,850						
19%	**Total Retail Consumer use Potable Wat**	**19,114**	**20,872**	**21,842**	**22,857**	**21,713**	**20,070**	**22,110**	**23,010**	**23,910**	**24,880**	**25,820**	
	City Pvll+ndc+other+recycle	1,830	2,047	2,060	2,200	2,039	1,505	4,240	4,240	4,240	4,240	4,240	
12%	**Other+Ag.potb.+Loss**	10,919	11,923	12,477	13,057	12,403	11,465	12,630	12,520	12,770	13,010	13,260	UWMP 2020 -pag 4-5& Table-11 Pg 4-18
Ac.Ft.	**Total DISTRICT use Potable Water**	**31,863**	**34,842**	**36,379**	**38,114**	**36,156**	**33,040**	**38,980**	**39,770**	**40,920**	**42,130**	**43,320**	
	Municipal potable water	22,241	25,063	26,005	27,669	26,283	**Table 4-2+3**	22,110	23,010	23,910	24,880	25,820	
	Other+Ag.potb.+Loss							12,630	12,520	12,770	13,010	13,260	Table 4-11 forecast future use
	Total Potable Demand							34,740	35,530	36,680	37,890	39,080	
	Recycled							4,240	4,240	4,240	4,240	4,240	
	Total Water Demand							**38,980**	**39,770**	**40,920**	**42,130**	**43,320**	**EID Table 4-11 -2021**
Ac.Ft.	**UWMP-Forecast Water Use, Table 4-11 (Ac.Ft.**												
Ac.Ft.	Total Municipal (potable?)							21,220	23,010	23,910	24,880	25,820	Table 4-11 forecast future use
Ac.Ft.	Total EID New Customers							890	1,790	2,690	3,660	4,600	Table 4-11 forecast future use
Ac.Ft.	EDH New Customers							580	1,210	1,830	2,480	3,170	Table 4-11 forecast future use
	325851 gal / AF-Gallons / HH												

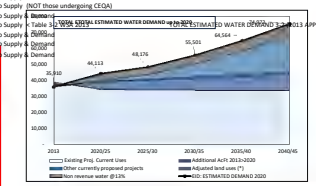
(7,644)



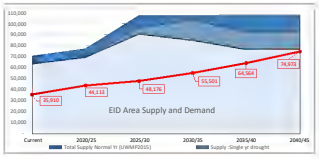


Water Supply Asst Table 3-2(2013)	**(UWMP - FINAL) ESTIMATED WATER DEMAND**	**2013**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**	
Output Table>	Table 3-1, pg 3-8							
Output Table>	Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464	>To Supply & Demand
Output Table>	Other currently proposed projects	0	163	696	1,052	1,272	1,332	>To Supply & Demand
Output Table>	Adjusted land uses	0	514	2,853	7,975	14,718	22,830	>To Supply (NOT those undergoing CEQA)
Output Table>	Non revenue water @13%	0	4,528	4,857	5,554	6,444	7,491	>To Supply & Demand
Output Table>	**TOTAL Ac.Ft. DEMAND (2013)**	**38,984**	**39,359**	**42,215**	**48,275**	**56,013**	**65,117**	>To Supply > Table 3-2 WSA 2013
	Dif: UWMP 2020 (-) Demand 2013	(3,074)	4,754	5,961	7,226	8,551	9,856	>To Supply & Demand
Output Table>	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**	>To Supply & Demand
EDH Allocation fact	**EDH: ESTIMATED DEMAND 2020**	**10,313**	**12,669**	**13,836**	**15,940**	**18,543**	**21,532**	>To Supply & Demand

Appendix 1: Water Supply Asst Table 3-2 W2013



		2013	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**
Table for graph	Existing Proj. Current Uses	38,984	34,154	33,809	33,694	33,579	33,464
Table for graph	**Additional AcFt 2013>2020**	(3,074)	4,754	5,961	7,226	8,551	9,856
Table for graph	Other currently proposed projects	-	163	696	1,052	1,272	1,332
Table for graph	Adjusted land uses (*)	-	514	2,853	7,975	14,718	22,830
Table for graph	Non revenue water @13%	-	4,528	4,857	5,554	6,444	7,491
Table for graph	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**



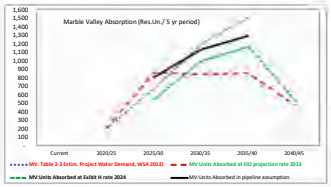
Memory calc. table	MEMORY CALC	Current	2020/25	2025/30	2030/35	2035/40	2040/45
Memory calc. table	Normal	70,800	70,800	70,800	70,300	78,300	78,300
Memory calc. table	Single yr drought	63,400	63,400	63,400	67,100	67,100	67,100
Memory calc. table	Five year drought	63,400	63,400	59,400	55,300	55,300	55,300
Memory calc. table		0.90	0.90	0.80	0.95	0.86	0.86
Memory calc. table		0.90	0.90	0.84	0.79	0.71	0.71
	Less EDC / SMUD Agt						
EIDF - UWMP 2015	**Total Supply Normal Year***	**70,800**	**77,490**	**107,690**	**107,690**	**108,190**	**108,190**

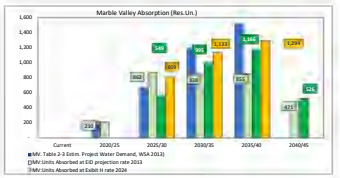
	* Public Services & Infrastructure - EID MSR & SOI Update FinalPage 7-16						
Table for graph		**Current**	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	**Total Supply Normal Yr (UWMP2015)**	**70,800**	**77,490**	**107,690**	**107,690**	**108,190**	**108,190**
Table for graph	Supply Single yr drought	63,400	69,391	96,434	102,788	92,715	92,715
Table for graph	Suppl : Five year drought	63,400	69,391	90,350	84,712	76,410	76,410
Table for graph	**EID: ESTIMATED DEMAND 2020**	**35,910**	**44,113**	**48,176**	**55,501**	**64,564**	**74,973**

MARBLE VALLEY AND LIME ROCK VALLEY DEVELOPER'S ALMANAC		**2013**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**
	Mar.Val.Existing (2013)	38,984	39,500	42,937	49,560	57,874	67,295
	Mar.Valy.Project		141	721	1,285	1,860	2,177
	Total Mvly	**38,984**	**39,359**	**42,216**	**48,275**	**56,014**	**65,118**
	Marble Valley : Presented Plan Meet 11th June						
	In AcFt	Current	2020/25	2025/30	2030/35	2035/40	2040/45
	Mar.Val.:Existing + Planned Future Proj	38,984	39,539	42,216	48,275	56,104	65,117
	Mar.Valy.Project SP		141	721	1,285	1,860	2,177
	Total Mvly	**38,984**	**39,680**	**42,937**	**49,560**	**57,964**	**67,294**
	Diference	-	57	(612)	(1,013)	(1,294)	(1,605)
	Lime Rock Valley : Presented Plan Meet 11th June						
		Current	2020/25	2025/30	2030/35	2035/40	2040/45
	Lime Rock: Existing + Planned Future Pro	38,984	39,482	42,828	49,288	57,402	66,722
	Lime Rock Valy.Project		18	109	272	472	573
	Total Lime Rock Valley SP	**38,984**	**39,680**	**42,937**	**49,560**	**57,964**	**67,294**

< 2013 data

(4,471)





		Current	2020/25	2025/30	2030/35	2035/40	2040/45	
	Mar.Valy.Project SP	141	721	1,285	1,860	2,177		
3236	**Total Mvly**	**141**	**580**	**564**	**575**	**317**	**2,177**	
Table for graph	**Table 3 - Marble Valley (residential un**	**Current**	**2020/25**	**2025/30**	**2030/35**	**2035/40**	**2040/45**	**TOTAL**
Table for graph	MV. Table 2-3 Estim. Project Water Demand, WSA 2		222	669	1,192	1,510		3,593
Table for graph	MV:Units Absorbed at EID projection rate 2013		210	862	838	855	471	3,236
Table for graph	MV:Units Absorbed at Exibit H rate 2024			549	995	1,166	526	3,236
Table for graph	**MV:Units Absorbed in pipeline assumption**			**809**	**1,133**	**1,294**		**3,236**

Table 2-10 pg3-16
7,617 Table 2-4
Table 2-3

Tble 2-7Pg 2-15

BAE Study Res Units
Table 2-3 EID2020 page -13

EID Study
EID 2020

Criteria*	AF - Year 2019	Citation
Potable Water Ac.Ft.	11,078	Table 4-1+3; page 4-4

EDH CONNECTIONS Table 2-1a	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
EDH Connections	**20,463**	**20,931**	**21,673**	**22,190**	**23,358**	**23,103**	**24,281**	**26,736**	**28,002**	**29,313**	**30,720**
EDH Connections / 5 yr period		**468**	**742**	**517**	**1,168**	**(255)**	**1,178**	**2,455**	**1,266**	**1,311**	**1,407**
EDH new resid Connections	**(86% sfd + 14%MF**						**1,285**	**2,683**	**4,068**	**5,506**	**7,054**
Expected New Resid Connections; T&Y-7	**Eastern Region**						**753**	**1,616**	**1,500**	**2,505**	**3,110**

	Total / Yr	549	995	1,166	526	AF/DU	AcFt							AcFt/DU	AcFt/EDU
AcFt/DU	**Marble Valley : Table 2-3 page 2-13 Exh**	**2,020**	**2,025**	**2,030**	**2,035**	Current	**2,025**	**2,030**	**2,035**	Current	**2,020**	**2,025**	**2,030**	**2,035**		
1.04	1 ac custom	25	45	145	193	1.16	1.04	1.04	1.04	29	47	151	201	1.04	289

RU4 - LIPA	4.7

0.8	1/2 ac custom	25	50	50	125	0.87	0.80	0.80	0.80		22	40	40	100	0.80	144	
0.53	8000/10000 sf Lot	215	593	593	982	0.55	0.53	0.53	0.53		118	314	314	520	0.53	749	
0.48	5000/7000 sf lot	-	-	663	663	0.50	0.48	0.48	0.48					318	0.48	458	
0.38	Condo / Tomom	75	597	772	772	0.40	0.38	0.38	0.38		30	227	293	293	0.38	422	
0.16	Mult Family	209	259	487	501	0.16	0.16	0.16	0.16		33	41	78	80	0.16	115	
	Total Cum	549	1,544	2,710	3,236	1.31	0.83	0.69	0.67		232	669	1,195	1,313	0.47	2,177	
	Corner+Public+Other (ROW)																
		549	1,544	2,710	3,236	1.31	0.83	0.69	0.67	141	489	636	665	664			
										141	721	1,285	1,860	2,177			

PPHH	3.5
Peop/Ac	16.3
Increase for project area	2.71
W.Cons./per	150.0
Years / Prd	5.00
Gal / Ac	33,197.5
Gal / Acft.	325,851
Acft Factor/ Unit	0.509

Total Proposed project demand

Marble Valley : Presented Plan Meet 11th June

LONG TERM DEMAND bases on Acre Feet and connections	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Memory Calc Table > EDH Connections	20,463	20,931	21,673	22,190	23,358	23,103	24,281	26,736	28,002	29,313	30,720
Memory Calc Table > Total Retail Consumer use Potable Wate	19,114	20,872	21,842	22,857	21,713	20,070	22,110	23,010	23,910	24,880	25,820
Memory Calc Table > Total DISTRICT use Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320

		2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	Total Retail Consumer use Potable Water	19,114	20,872	21,842	22,857	21,713	20,070	22,110	23,010	23,910	24,880	25,820
Table for graph	Total DISTRICT use Potable Water	12,749	13,970	14,537	15,257	14,443	12,970	16,870	16,760	17,010	17,250	17,500
Table for graph	Total DISTRICT use Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320

	POPULATION	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2035/40	2040/45	2045/48
Table for graph	ED County Official Projections	184,627	186,027	188,793	190,925	193,057	191,245	196,079	206,080	216,593	227,641	239,253
Table for graph	Population: Dept of Finance (CA)	181,058	181,058	181,058	187,940	187,940	191,032	186,186	185,434	183,477	179,456	174,271
Table for graph	EID Area population	119,503	121,853	124,316	126,316	129,056	129,056	134,000	139,100	144,000	149,300	154,900
Table for graph	EID data for EDH population	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808

Memory Calc Table >	POPULATION	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2035/40	2040/45	2045/48
Memory Calc Table >	ED County Official Projections	184,627	186,027	188,793	190,925	193,057	191,245	196,079	206,080	216,593	227,641	239,253
Memory Calc Table >	ED County Official Projections	3,569	4,969	7,735	2,985	5,117	213	9,893	20,646	33,116	48,185	64,982
Memory Calc Table >	Population: Dept of Finance (CA)	61,555	59,205	56,742	61,624	58,884	61,976	52,186	46,334	39,477	30,156	19,371
Memory Calc Table >	EID Area population	51,774	52,752	52,761	53,537	52,857	53,707	54,900	51,800	52,400	53,100	55,092
Memory Calc Table >	**Derived EDH Pop. From County base**	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808

	RESIDENTIAL UNIT DEMAND BASED ON	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Occ/Un 3.5	**Derived EDH Pop. From County base**	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808
	Estimated Resid. Units EDH @3.5pphh	19,351	19,743	20,444	20,794	21,771	21,528	22,600	24,943	26,171	27,486	28,517 >>>>>
Table for graph	Pop Based: Res Units: 5 yr increment		392	701	350	977	(243)	1,072	2,343	1,229	1,314	1,031 >>>>

	RESIDENTIAL UNIT DEMAND BASED ON	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
Table for graph	EDH Res.Units. from County base : cumulative		392	1,093	1,443	2,420	2,177	3,249	5,592	6,820	8,135	9,166
Table for graph	EDH Res. Units in Pipeline: cumulative							5,756	3,818	5,345	6,108	6,108
	TOTAL EDH Res.Units in Pipeline: cumulative		**392**	**1,093**	**1,443**	**2,420**	**2,177**	**5,005**	**9,409**	**12,165**	**14,243**	**15,274**

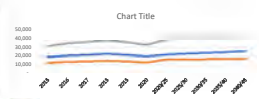
	DEMAND SUMMARY BY DIFFERENT METHODOLOGIES (BASE DATA FROM DIFFERENT SOURCES)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	UWMP 2020Potable Water	31,863	34,842	36,379	38,114	36,156	33,040	38,980	39,770	40,920	42,130	43,320
	EDH Connections	20,463	20,931	21,673	22,190	23,358	23,103	24,281	26,736	28,002	29,313	30,720
	Derived EDH Pop. From County base	67,729	69,101	71,555	72,779	76,199	75,349	79,100	87,300	91,600	96,200	99,808
	EDC Housing Units -BAE Study 2023	54,929	54,929	54,929	54,929	55,605	55,605	57,352	57,352	59,151	61,015	62,957

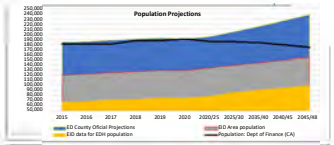
	GROWTH TENDENCIES (2015 BASE=1.00)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	ED County Official Projections	1.00	1.01	1.02	1.03	1.05	1.04	1.06	1.12	1.17	1.23	1.30
	Population: Dept of Finance (CA)	1.00	1.00	1.00	1.04	1.04	1.06	1.03	1.02	1.01	0.99	0.96
	EID Area population	1.00	1.02	1.04	1.06	1.08	1.08	1.12	1.16	1.20	1.25	1.30
	Derived EDH Pop. From County base	1.00	1.02	1.06	1.07	1.13	1.11	1.17	1.29	1.35	1.42	1.47

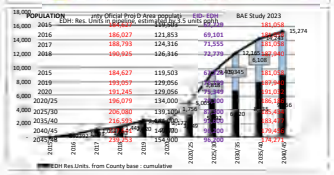
	GROWTH TENDENCIES (2015 BASE=1.00)	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
	UWMP 2020Potable Water	1.00	1.09	1.14	1.20	1.13	1.04	1.22	1.25	1.28	1.32	1.36
	EDH Connections	1.00	1.02	1.06	1.08	1.14	1.13	1.19	1.31	1.37	1.43	1.50
	EID data for EDH population	1.00	1.02	1.06	1.07	1.13	1.11	1.17	1.29	1.35	1.42	1.47
	EDC Housing Units -BAE Study 2023	1.00	1.00	1.00	1.00	1.01	1.01	1.04	1.04	1.08	1.11	1.15

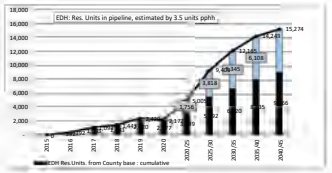
	2015	2016	2017	2018	2019	2020	2020/25	2025/30	2030/35	2035/40	2040/45
UWMP 2020Potable Water	1.00	1.09	1.14	1.20	1.13	1.04	1.22	1.25	1.28	1.32	1.36
ED County Official Projections	1.00	1.01	1.02	1.03	1.05	1.04	1.06	1.12	1.17	1.23	1.30

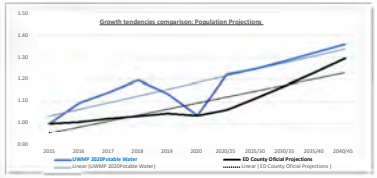
64,917

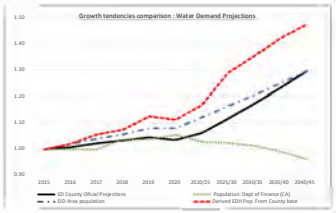


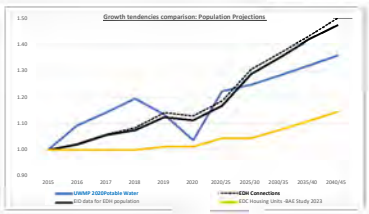




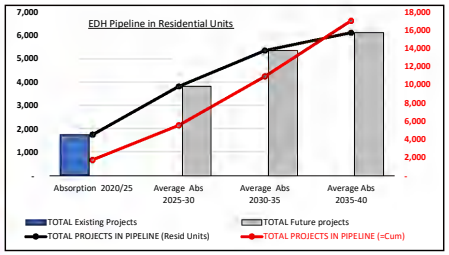








	EDH AREA FROM PIPELINE ANALYSIS	Absorption 2020/25	Average Abs 2025-30	Average Abs 2030-35	Average Abs 2035-40	
Res. Units>	TOTAL Existing Projects	1,756	-	-	-	
Res. Units>	TOTAL Future projects	-	3,818	5,345	6,108	
Res. Units>	**TOTAL PROJECTS IN PIPELINE (Resid Units)**	**1,756**	**3,818**	**5,345**	**6,108**	
Res. Units>	**TOTAL PROJECTS IN PIPELINE (=Cum)**	**1,756**	**5,574**	**10,918**	**17,026**	
	AGREGATE DEMAND in EDH AREA	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout
Res. Units>	PROJECTS IN PIPELINE (Resid Units)	1,756	3,818	5,345	6,108	-
Res. Units>	**Pipeline Cumulative**	**1,756**	**5,574**	**10,918**	**17,026**	**17,026**



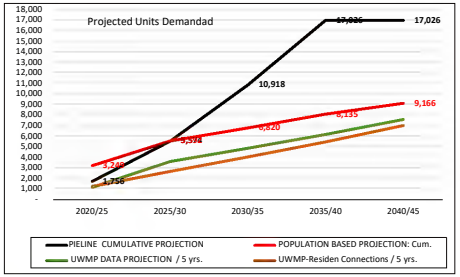
	POP.BASE. RESID.UNIT PROJECTION	2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	Population- Res Units: Annual increment	1,072	2,343	1,229	1,314	1,031
Res. Units>	Population: Cummulative units	3,249	5,592	6,820	8,135	9,166

		Units PER 5 YR PERIOD						
	DEMAND EID AREA	Estimated Absorption 2015/20	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Units Remaining 2040++	
Res. Units>	**EDH per 5 yr period**	**0**	**1,285**	**1,398**	**1,385**	**1,438**	**1,548**	Table 2-3 EID2020 page -13 (BAE Study)
Res. Units>	Eastern Region	500	753	563	584	605	605	
Res. Units>	Western Region	150	218	163	168	175	175	
Res. Units>	**TOTAL EID**	**650**	**2,256**	**2,124**	**2,137**	**2,218**	**2,328**	
Res. Units>	UWMP 2020	**Cummulative units - table 2-3 pg 2-13**						
Res. Units>	**EDH Aarea - CUMULATIVE**	**0**	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**	Table 2-3 EID2020 page -13 (BAE Study)
Res. Units>	Eastern Region	500	753	1,316	1,900	2,505	3,110	Table 2-7 EID2020 page -15 (BAE Study)
Res. Units>	Western Region	150	218	381	549	724	899	Table 2-8 EID2020 page -15 (BAE Study)
	TOTAL EID	650	**2,038**	**3,999**	**5,968**	**8,011**	**10,164**	

			3,818	5,345	6,108	-		
	Residential Units	2020/25	2025/30	2030/35	2035/40	2040/45		
Res. Units>	PIELINE CUMULATIVE PROJECTION	**1,756**	**5,574**	**10,918**	**17,026**	**17,026**		
Res. Units>	PIPELINE per 5 year period	1,756	3,818	5,345	6,108	-		
Res. Units>	POPULATION BASED PROJECTION: Cum.	**3,249**	**5,592**	**6,820**	**8,135**	**9,166**		
Res. Units>	POPULATION BASED PROJECTION / 5 yrs.	1,072	2,343	1,229	1,314	1,031		
Res. Units>	UWMP DATA PROJECTION - Cum.	**1,178**	**3,633**	**4,899**	**6,210**	**7,617**	Table 2-3 Pag 2-13	Table 2-4
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	2,455	1,266	1,311	1,407	Table 2-3 Pag 2-13	Table 2-4
Res. Units>	**UWMP-Residen Connections cum.**	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**	table 2-3 pg 2-13	
Res. Units>	UWMP-Residen Connections / 5 yrs.	1,285	1,398	1,385	1,438	1,548	table 2-3 pg 2-13	

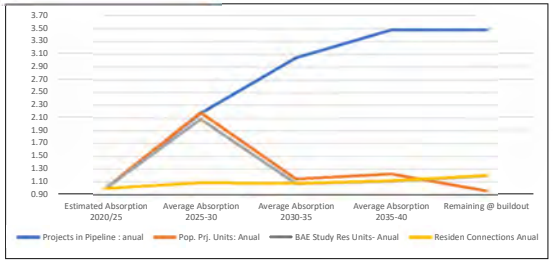
		2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	**PIPELINE per 5 year period**	1,756	3,818	5,345	6,108	-
Res. Units>	POPULATION BASED PROJECTION / 5 yrs.	1,072	2,343	1,229	1,314	1,031
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	2,455	1,266	1,311	1,407
Res. Units>	UWMP-Residen Connections / 5 yrs.	1,285	1,398	1,385	1,438	1,548

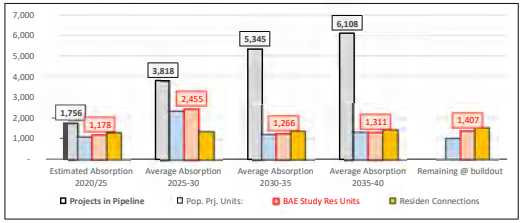
	PROJECTIONS : Cumulative	2020/25	2025/30	2030/35	2035/40	2040/45
Res. Units>	PIELINE CUMULATIVE PROJECTION	1,756	5,574	10,918	17,026	17,026
Res. Units>	POPULATION BASED PROJECTION: Cum.	3,249	5,592	6,820	8,135	9,166
Res. Units>	UWMP DATA PROJECTION / 5 yrs.	1,178	3,633	4,899	6,210	7,617
Res. Units>	UWMP-Residen Connections / 5 yrs.	**1,285**	**2,683**	**4,068**	**5,506**	**7,054**



	EDH- ESTIMATED DEMAND per 5 yr. period by different methodologies	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout	TOTAL	
Res. Units>	Projects in Pipeline	1,756	3,818	5,345	6,108		**17,026**	17,026
Res. Units>	Pop. Prj. Units:	1,072	2,343	1,229	1,314	1,031	**6,988**	9,409
Res. Units>	BAE Study Res Units	1,178	2,455	1,266	1,311	1,407	**7,617**	10,038
Res. Units>	Residen Connections	1,285	1,398	1,385	1,438	1,548	**7,054**	9,972

Base in	EDH- ESTIMATED 5 YR. DEMAND by different methodologies BASE:2020	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Remaining @ buildout
Res. Units>	Projects in Pipeline : anual	1.00	2.17	3.04	3.48	3.48
Res. Units>	Pop. Prj. Units: Anual	1.00	2.19	1.15	1.23	0.96
Res. Units>	BAE Study Res Units- Anual	1.00	2.08	1.07	1.11	1.19
Res. Units>	Residen Connections Anual	1.00	1.09	1.08	1.12	1.20





					50%	< % of total REMAINING						
Carson Creek SP		1,700	1,160	540	200	340					340	68%
Valley View SP		2,840	2,139	701	200	501					501	75%
Project		Total Units Entitled	Built	EDH: Current Inventory	Additional units sold 2020-2025	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption to Buildout	TOTAL	% Remaining
EDH-SP (Serrano)		6,162	4,614	1,548	774	774					774	75%
Saratoga Estates		317	317	-	-	-					-	100%
El Dorado Town Center		214	-	214	107	107					107	0%
Promontory SP		1,100	709	391	196	196					196	64%
Bass Lake SP		1,458	99	1,359	680	680					680	7%
TOTAL Existing Projects		**9,251**	5,739	3,512	**1,756**	**1,756**	-	-	-		1,756	**71%**
							25%	35%	40%	0%	100%	0%

EDH-SP Ap 2021- Table S-1 GP-2024

EDH-SP Ap 2021- Table S-1 GP-2024

	Acres	Project name	Large SFD	SFD	MF	Other	Total Units	Estimated Absorption 2020/25	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	TOTAL	
1	**638**	East Ridge/ Valley View SP	701				701		175	245	280	-	**701**	
2	**2,342**	**Village of Marble Valley (SP)**	**1,963**	**1,209**		**64**	**3236**		**809**	**1,133**	**1,294**	**-**	**3,236**	
3	**740**	**Lime Rock Valley SP**	**550**		**250**		**800**		**200**	**280**	**320**	**-**	**800**	
4	**208**	Creekside Village- SP		668	250		**918**		230	321	367	-	**918**	
5	**43**	EDH 52 - Mixed Use Center			304		**304**		76	106	122	-	**304**	
6	**1,416**	Health and Independence SP		3,481	108	921	**4510**		1,128	1,579	1,804	-	**4,510**	
7	**208**	Town & Country Village SP				918	**918**		230	321	367	-	**918**	
8	**98**	Carson Creek SP		311	315	124	**750**		188	263	300	-	**750**	EDH-SP Ap 2021- Table S-1 GP-2024 (CHECK w.County)
9	**116**	Town Center West (total 2340 Ac)			940		**940**		235	329	376	-	**940**	EDH-SP Ap 2021- Table S-1 GP-2024(CHECK w.County)
10	**14**	Monsanto Manor			320		**320**		80	112	128	-	**320**	
11	**280**	Generations at Green Valley		165	214	60	**439**		110	154	176	-	**439**	
12	**104**	Cameron Meadows		161			**161**		40	56	64	-	**161**	
13	**143**	Dorado Oaks TM Subdiv		156	225		**381**		95	133	152	-	**381**	
14	**25**	Green Valley Road	54				**54**		14	19	22	-	**54**	
15	**8**	Serrano Village M5	20				**20**		5	7	8	-	**20**	
16	**5**	Bass Lake Fly Apts			124	2	**126**		32	44	50	-	**126**	
17	**40**	EDH - Golf Course (estimate remaining)					**500**		125	175	200	-	**500**	
18	**5**	Country Club Apts			192		**192**		48	67	77	-	**192**	
19	**6,434**	**TOTAL Future projects**	**3,288**	**6,151**	**3,242**	**2,089**	**15,270**	-	**3,818**	**5,345**	**6,108**	**-**	**15,270**	
	1614	Texas Hill Reservoir												< Is there an estimate of Res.Un.?
	?	Heritage at Carson Creek												< Is this an active project? There is a map proposed.
		PROJECTS IN PIPELINE	3,288	15,402	8,981	5,601	18,782	1,756	3,818	5,345	6,108		17,026	

NOTE THE FORGOING TABLE IS BACKED UB BY A SEPARATE DOCUMENT DETAILING THE INFORMATION FROM THE COUNTY'S WEBSITE AND IS AVAILABLE UPON REQUEST

	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	
Case A	25%	35%	40%	0%	100%
Case B	25%	25%	25%	25%	
Case D	30%	30%	35%	5%	100%

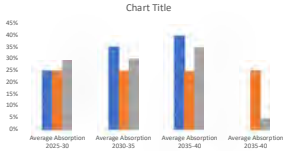
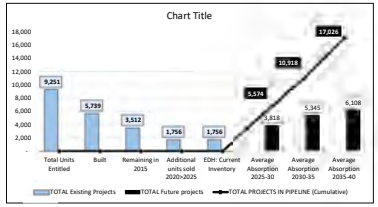
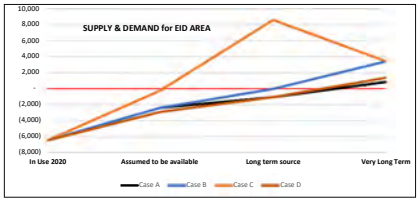


		Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020-2025	EDH: Current Inventory	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	"PIPELINE" TOTAL RES. UNITS
		TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**	-	-	-	**1,756**
		TOTAL Future projects						3,818	5,345	6,108	15,270
		TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**	**3,818**	**5,345**	**6,108**	**17,026**
		TOTAL PROJECTS IN PIPELINE (Cumulative)						**5,574**	**10,918**	**17,026**	



Determining Acre Feet demanded based on existing residential units in pipeline				
EDH AREA PIPELINE ANALYSIS in ac.ft.	In Use	Assumed to be available	Long term source	Very Long Term
DEMAND: EDH AREA	1,756	3,818	5,345	6,108
DEMAND: EDH AREA Cumulative	1,756	5,574	10,918	17,026
EDH AREA PIPELINE ANALYSIS in ac.ft.	In Use	Assumed to be available	Long term source	Very Long Term
EDH: ESTIMATED DEMAND 2020	12,669	13,836	15,940	18,543
0.673 EDH PIPELINE (cumulative)	1,181	3,750	7,345	11,454
TOTAL: EID Current + EDH Demand	**13,851**	**17,586**	**23,285**	**29,997**

420	<GPD / HH
120	Usage: Galons / day
1825	Days in 5 Years
219,000	Total Galons in 5 Yrs
325,851	Galons in an Ac.Ft.
0.67	Acre feet / unit/Syr

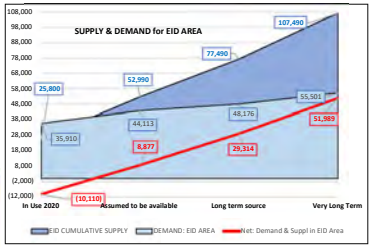


EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	67,190
Sub Total Planned	-		7,500	30,000	37,500
Recycled water	2,800	-	-	-	2,800
TOTAL Acre Feet	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**
CUMULATIVE SUPPLY	**25,800**	**52,990**	**77,490**	**107,490**	
EDH Alocation factor (base 2019) 28.7%					
EDH CUMULATIVE SUPPLY	**7,410**	**15,219**	**22,255**	**30,871**	

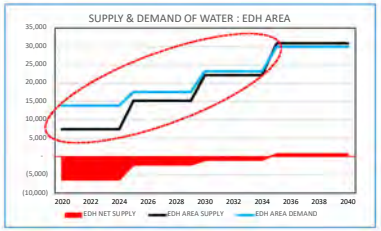
	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Allocation	Average Allocation	Average Allocation	Average Allocation	Acre Brought forward Assumed available 2035-39
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	-	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to be	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**

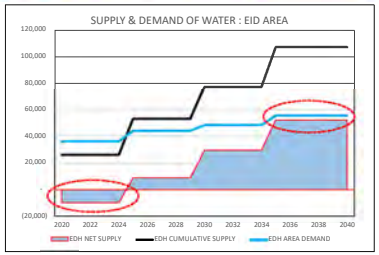
SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



	EDH AREA SUPPLY	EDH AREA DEMAND	EDH NET SUPPLY
2020	7,410	13,851	(6,441)
2021	7,410	13,851	(6,441)
2022	7,410	13,851	(6,441)
2023	7,410	13,851	(6,441)
2024	7,410	13,851	(6,441)
2025	15,219	17,586	(2,367)
2026	15,219	17,586	(2,367)
2027	15,219	17,586	(2,367)
2028	15,219	17,586	(2,367)
2029	15,219	17,586	(2,367)
2030	22,255	23,285	(1,030)
2031	22,255	23,285	(1,030)
2032	22,255	23,285	(1,030)
2033	22,255	23,285	(1,030)
2034	22,255	23,285	(1,030)
2035	30,871	29,997	874
2036	30,871	29,997	874
2037	30,871	29,997	874
2038	30,871	29,997	874
2039	30,871	29,997	874
2040	30,871	29,997	874



	EDH CUMULATIVE SUPPLY	EDH AREA DEMAND	EDH NET SUPPLY
2020	25,800	35,910	(10,110)
2021	25,800	35,910	(10,110)
2022	25,800	35,910	(10,110)
2023	25,800	35,910	(10,110)
2024	25,800	35,910	(10,110)
2025	52,990	44,113	8,877
2026	52,990	44,113	8,877
2027	52,990	44,113	8,877
2028	52,990	44,113	8,877
2029	52,990	44,113	8,877
2030	77,490	48,176	29,314
2031	77,490	48,176	29,314
2032	77,490	48,176	29,314
2033	77,490	48,176	29,314
2034	77,490	48,176	29,314
2035	107,490	55,501	51,989
2036	107,490	55,501	51,989
2037	107,490	55,501	51,989
2038	107,490	55,501	51,989
2039	107,490	55,501	51,989
2040	107,490	55,501	51,989



UWMO- Chapter 4 Page 4-6	EDH		UWMO- Chapter 4 Page 4-12	Tota EID
Single Family	4,574	31.8%	Single Family	14,400
SF-Attached	918	109.3%	SF-Attached	840
Multi Family	655	43.1%	Multi Family	1,520
Sub Total Residential area	**6,147**	36.7%	**Sub Total Residential are**	**16,760**
Commer / Indust	755	53.5%	Commer / Indust	1,410
Landscapeing	780	85.7%	Landscapeing	910
Rece. Turf	617	62.3%	Rece. Turf	990
Sub Total ommer +Ldsc+Tf	**2,152**	65.0%	**Sub Total ommer +Ldsc+**	**3,310**
Land Development	**8,299**	41.4%	**Land Development**	**20,070**
Ag Metered Irrigation	29	0.9%	Ag Metered Irrigation	3,300
Small Farm	132	11.0%	Small Farm	1,200
Sub Total Ag	**161**	3.6%	**Sub Total Ag**	**4,500**
City Placerville			City Placerville	1,200
Ditch Service - potable			Ditch Service - potable	
Other Authorized Use			Other Authorized Use	
Recycled Supplement			Recycled Supplement	
Sub Total P'ville + other	-		Sub Total P'ville + other	**1,200**
Total Usage 2019	**8,460**	32.8%	**Total Usage 2019**	**25,770**

Customer usage for 2019 in Ac-Ft.

	Tota EID		EDH	Other + P'ville	Est+West+otr	Supply ?	Excess AF (table 4-6 page 4-B)
Single Family	12,587	47.9%	7517		5,070		
SF-Attached	824	3.1%	824		-		
Multi Family	1,273	4.8%	585		688		
Sub Total Residential area	**14,684**	**55.9%**	8,926		**5,758**		
Commer / Indust	1,616	6.1%	763		853		
Landscapeing	776	3.0%	680		96		
Rece. Turf	833	3.2%	572		261		
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	2,015		**1,210**		
Land Development	**17,909**	**68.1%**	10,941		**6,968**	30,014	12,105
Ag Metered Irrigation	2,735	10.4%	26		2,709		
Small Farm	1,068	4.1%	111		957		
Sub Total Ag	**3,803**	**14.5%**	137		3,666	5,059	1,256
City Placerville	1,000	3.8%		1,000		1,148	148
Ditch Service - potable	395	1.5%		395			
Other Authorized Use	2,564	9.8%		2,564			
Recycled Supplement	612	2.3%		612			
Sub Total P'ville + other	**4,571**	17.4%		4,571	-	**1,148**	(3,423)
Total Usage 2019	**26,283**	100.0%	**11,078**	**4,571**	**10,634**	**36,221**	**9,938**
			42.1%	17.4%	40.5%		

EDH	**11,078**	**42.1%**
West	5,388	20.5%
East	5,246	20.0%
Others*	4,571	17.4%
TOTAL	**26,283**	100.0%
SUPPLY - Sly Park Only	23,000	87.5%

	Tota EID		EDH	Other + P'ville	Est+West+otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	**14,684**	**55.9%**	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	**3,225**	**12.3%**	2,015	-	1,210
Sub Total Ag	**3,803**	14.5%	137	-	3,666
Sub Total P'ville + other	**4,571**	17.4%	-	4,571	-
Total Usage 2019	**26,283**	**100.0%**	**11,078**	**4,571**	**10,634**

	TOTAL	42.1%	EDH % of Cou	West	East
Sub Total Residential area	14,684	55.9%	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	3,225	12.3%	2,015	-	1,210
EDH : Resid + Commercial	**17,909**	**68.1%**	**10,941**	-	**6,968**
EDH Alocation factor (base 2019)		**28.7%**	**< EDH Factor**		

	Normal	single dry	yr 2	yr 3
2020	42,938.0	45,084.0	41,928.0	38,321.0
	0%	5%	-2%	-11%
2025	49,561.0	52,039.0	48,396.0	44,233.0
	0%	5%	-2%	-11%

SUPPLY TABLES

			Water Supply Realibility - 2020					
	Distr Normal yr	Normal year	In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	2020 Urban Water Plan
Lic#11835/6	***30%***	**23,000**	**23,000**	**-**	**-**	**-**	**23,000**	**23,000**
Warren Act Contract	***6%***	4,560	-	4,560	-	-	4,560	4,560
American River Diversion	***19%***	15,080	-	15,080	-	-	15,080	15,080
Permit 21112	***22%***	17,000	-	-	17,000	-	17,000	17,000
CPV Contract	***10%***	7,550	-	7,550		-	7,550	7,550
Outingdale / Cosumnes (110)	***0%***	-		-			-	
Sub Total Existing Contracts	***87%***	**67,190**	**23,000**	**27,190**	**17,000**	**-**	**67,190**	**67,190**
Fazio Water 1990	***10%***	7,500	-		7,500		7,500	7,500
El Dorado - SMUD Coop Agt	***0%***					30,000	30,000	
Sub Total Planned	***10%***	**7,500**	**-**	**-**	**7,500**	**30,000**	**37,500**	**7,500**
Recycled water	***4%***	2,800	2,800				2,800	2,800
TOTAL Acre Feet	***100%***	**77,490**	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**	**77,490**
			25,800	52,990	77,490	107,490	-	

	Distr Normal yr	Normal year	In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	2020 Urban Water Plan
Sub Total Existing Contracts	*87%*	67,190	23,000	27,190	17,000	-	67,190	67,190
Sub Total Planned	*10%*	7,500	-	-	7,500	30,000	37,500	7,500
Recycled water	*4%*	2,800	2,800	-	-	-	2,800	2,800
TOTAL Acre Feet	***100%***	**77,490**	**25,800**	**27,190**	**24,500**	**30,000**	**107,490**	**77,490**
		Cum>	25,800	52,990	77,490	107,490	**> TO Sup& Dmd Table>**	

		Max		**Normal**		Single Dry
-	Sly Park Resevoir	33,400	10,400	**23,000**	(2,080)	20,920
-	Weber Resevoir rights	4,560	-	**4,560**	(1,560)	3,000
-	Project 184 (1914Forbay)	15,080	-	**15,080**	-	15,080
-	Permit 2112 (Warren Act)	17,000	-	**17,000**	-	17,000
-	CVP Contract- Fazio	7,550	-	**7,550**	(3,775)	3,775
(110)	Outingdale / Cosumnes	-	(110)	**110**	(6)	104
(110)	-	**77,590**	**10,290**	**67,300**	**(7,421)**	**59,879**
	Recycled	3,500	-	**3,500**		

In Use	"Assumed to be.." available	Long term source	Very Long Term	TOTAL	% Distrib x source	Dry Year	WATER SUPPLY REALIBILITY from 2020 UWMP DRAFT 2021
	4,560			**4,560**	***6%***	***3,000***	1. **Ditches / Weber Reservoir Rights (License 2184 and Pre-1914 Water Rights)** are appropriative 4,560 acre-feet has historically been available in average years and is assumed to be available in future average years.
23,000				**23,000**	***31%***	***20,920***	2. **Sly Park Reservoir (License 11835 and 11836 and pre-1914 Camp Creek right)**, **, is the District's only existing supply source whose value during average years is** less than the maximum water right. Although the rights allow up to 33,400 acre-feet, and the District has diverted as much as 25,745 acre-feet, 23,000 acre-feet is used for planning purposes for an average year due to the need to set aside carryover storage for future years.
		7,550		**7,550**	***10%***	***3,775***	3. **Central Valley Project water (Contract 14-06-200-1375A-LTR1-P)** 7,550 acre-feet in average years and is assumed to be available in future average years.
	15,080			**15,080**	***20%***	***15,080***	4. **Project 184 (Pre-1914 appropriative rights from the Upper South Fork American River)** 15,080 acre-feet, to be fully available inaverage years
		17,000		**17,000**	***23%***	***17,000***	5. **Permit 21112** allows the District to divert up to 17,000 acre-feet of water per year at Folsom Reservoir through a Warren Act Contract. This supply has not historically been available in its full amount pending the completion of a temperature control device at the District's intake from Folsom Reservoir, which is expected to be completed in 2021.
	104			**104**	***0%***	***104***	6. **Outingdale/ Middle Fork Cosumnes Supplies (Permit 4071)** provides up to 104 acre-feet per year of water during average years, and is expected to remain at this level in future average years.
							7. **Recycled Water** is projected to provide 3,500 acre-feet in average years. Note that this supply is **non-potable water.**
			7,500	**7,500**	***10%***	***7,500***	8. **Central Valley Project Fazio Water** is expected to include 7,500 acre-feet Once secured, projected to occur by 2035,
23,000	**19,744**	**24,550**	**7,500**	**74,794**	***100%***	***67,379***	**TOTAL SUPPLY**
31%	26%	33%	10%	100%		90%	

The conclusion that EID should have sufficient water available to meet the needs of the Proposed Project, in addition to the other demands in its service area through 2035, rests on the following set of assumptions: ! EID, EDCWA, and EDWPA successfully execute the contracts and obtain the water right permit approvals for currently unsecured water supplies discussed in Section 4. Absent these steps, the water supplies currently held by EID and recognized to be diverted under existing contracts and agreements would be insufficient in 2035 to meet the Proposed Project demands along with all other existing and planned future uses. ! EID will commit to implement Facility Capacity Charges in an amount sufficient to assure the financing is available as appropriate to construct the necessary infrastructure as detailed in the March 2013 EID Integrated Water Resources Master Plan. ! Demand in single-dry years includes an additional 5 percent of demand over the normal year demand during the same time period. This conservative assumption accounts for the likelihood that EID customers will irrigate earlier in the season to account for dry spring conditions. This hypothetical demand augmentation may or may not manifest in dry years, but this conservative assumption further tests the sufficiency of water supplies during dry conditions. ! The estimated demands include 13 percent to account for non-revenue water losses (e.g. distribution system losses). The finding of this WSA is that EID should have sufficient water to meet the demands of Proposed Project and its other service area demands for the next 20 years.

Average Year Water Supply Availability is based on the following assumptions: 2013 WSA

1. Ditches / Weber Reservoir Rights (License 2184 and Pre-1914 Water Rights) are appropriative water rights associated with Slab, Hangtown, Mill, and Weber Creeks. **The maximum value of 4,560 acre-feet has historically been available in average years and is assumed to be available in future average years**
2. 2. Sly Park Reservoir (License 11835 and 11836 and pre-1914 Camp Creek right), also called **Jenkinson Lake, is the District's only existing supply source whose value during average years is less than the maximum water right.** Although the rights allow up to 33,400 acre-feet, and the District has diverted as much as 25,745 acre-feet, **23,000 acre-feet is used for planning purposes** for an average year due to the need to set aside carryover storage for future years.
3. 40 El Dorado Irrigation District 2020 Water Quality Report, Outingdale Water System 41 El Dorado Irrigation District 2020 Water Quality Report, Strawberry Water System 42 The El Dorado Irrigation District Integrated Water Resources Master Plan, March 31, 2013 Chapter 3 – Water Supply 2020 UWMP – Final 3-14 3.
4. Central Valley Project water (Contract 14-06-200-1375A-LTR1-P) has historically been available at its maximum value of 7,550 acre-feet in average years and is assumed to be available in future average years.
5. 4. Project 184 (Pre-1914 appropriative rights from the Upper South Fork American River) have an early priority date that has **allowed this source of water, 15,080 acre-feet, to be fully available in average years** and is assumed to be available in future average years. Supplies for the District's Strawberry system are included in this supply.
6. 5. Permit 21112 allows the District to divert up to 17,000 acre-feet of water per year at Folsom Reservoir through a Warren Act Contract. This supply has not historically been available in its full amount pending the completion of a temperature control device at the District's intake from Folsom Reservoir, **which is expected to be completed in 2021**. Based upon the availability of the supply in Permit 21112, the ability to store the water in Caples, Silver, and Lake Aloha, and the long-term Warren Act Contract with USBR, the average-year availability of this supply is 17,000 acre-feet.
7. 6. Outingdale/ Middle Fork Cosumnes Supplies (Permit 4071) provides up to 104 acre-feet per year of water during average years, and is expected to remain at this level in future average years.
8. 7. **Recycled Water is projected to provide 3,500 acre**-feet in average years. Note that this supply is non-potable, in contrast to the other District supplies presented in this section.
9. **8. Central Valley Project Fazio Water is expected to include 7,500 acre-feet o**r more as authorized by federal law. Once secured, projected to occur by 2035, the District is expected to receive its full entitlement in average years. While the District's existing supplies are sufficient to meet demands throughout all scenarios examined in the planning period based on current conditions and assumptions, securing the Fazio CVP Supply will further improve future reliability. The District's projected average year supplies are summarized in Table 3-2.

El Dorado Hills – Cameron Park Area Projects.

E.D.Co. Planning Department: "projects in your area" – 8 June 2024

Compiled by Alastair Dunn, for EDH - APAC

Please note that all the project information in this document was taken verbatem from the County's Website.

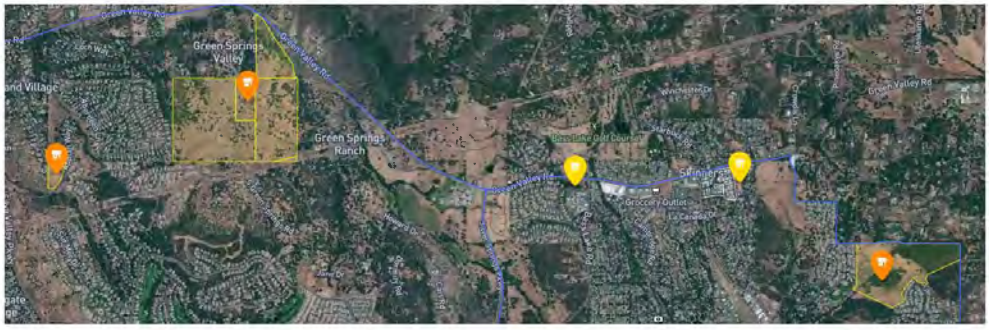
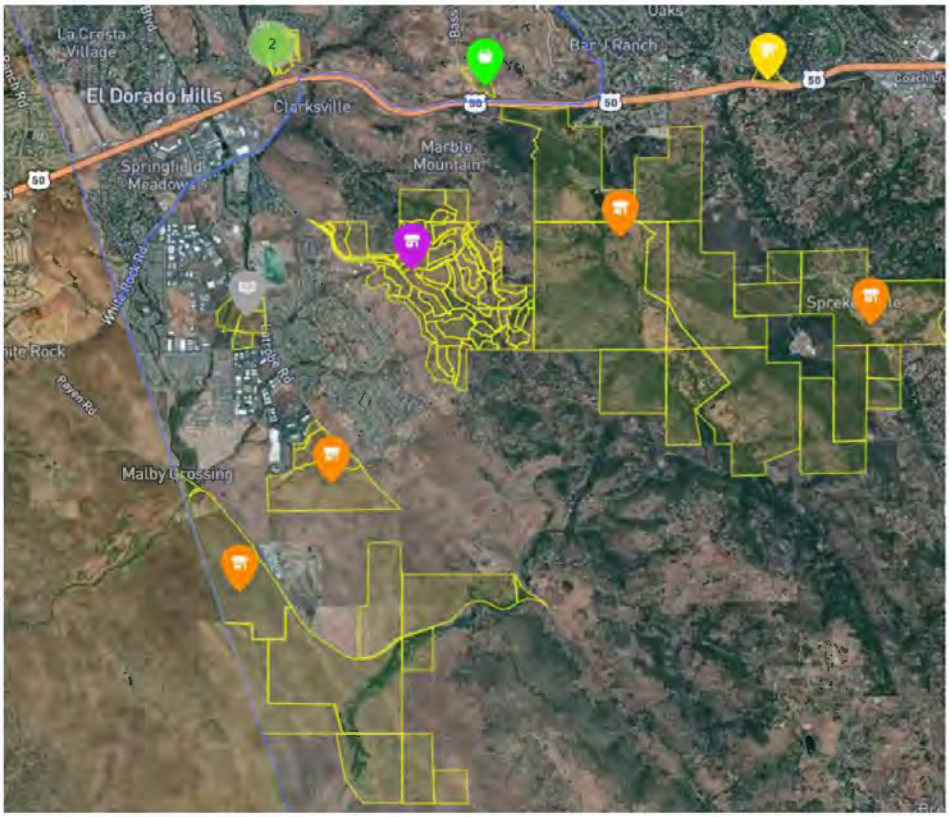


Table 4: Currently approved projects in the EDH Area	Total Units Entitled	Built	Remaining in 2015	Additional units sold 2020>2025	EDH: Current Inventory
TOTAL Existing Projects	9,251	5,739	3,512	1,756	**1,756**
TOTAL Future projects					**15,270**
TOTAL PROJECTS IN PIPELINE	**9,251**	**5,739**	**3,512**	**1,756**	**17,026**
TOTAL PROJECTS IN PIPELINE (Cumulative)					



EL DORADO HILLS AREA: CURRENT AND FUTURE RESIDENTIAL UNITS

Project	Total Units Entitled	Built	EDH: Current Inventory	Additional units sold 2020>2025	Estimated Absorption 2020/25
Carson Creek SP	1,700	1,160	540	200	340
Valley View SP	2,840	2,139	701	200	501
EDH-SP (Serrano)	6,162	4,614	1,548	774	774
Saratoga Estates	317	317	-	-	-
El Dorado Town Center	214	-	214	107	107
Promontory SP	1,100	709	391	196	196
Bass Lake SP	1,458	99	1,359	680	680
TOTAL Existing Projects	**9,251**	**5,739**	**3,512**	**1,756**	**1,756**

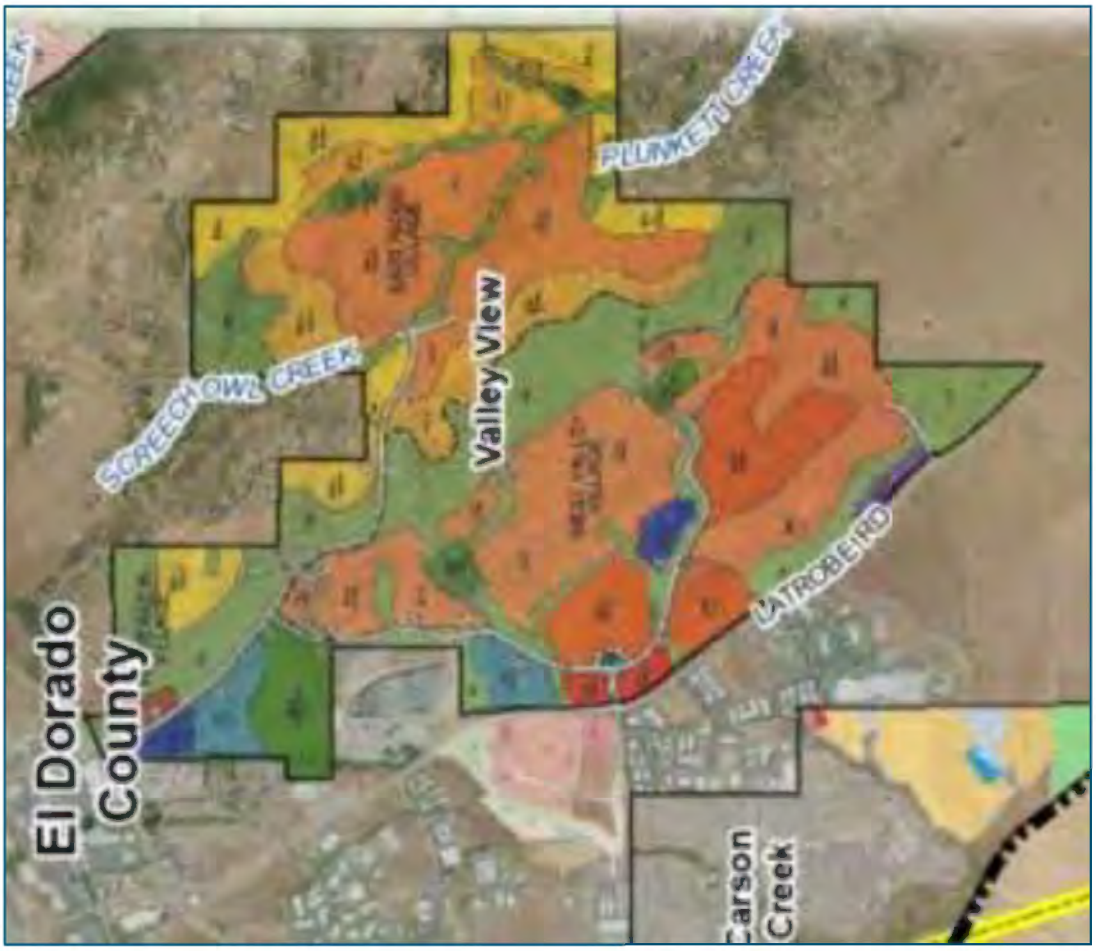
Acres	Project name	SFD	MF	Other	Additional units sold 2020>2025	Total Units
638	East Ridge/ Valley View SP					701
2,342	**Village of Marble Valley (SP)**	**1,209**		**64**		**3236**
740	**Lime Rock Valley SP**		**250**			**800**
208	Creekside Village- SP	668	250			**918**
43	EDH 52 - Mixed Use Center		304			**304**
1,416	Health and Independence SP	3,481	108	921		**4510**
208	Town & Country Village SP			918		**918**
98	Carson Creek SP	311	315	124		**750**
116	Town Center West (total 2340 Ac)		940			**940**
14	Monsanto Manor		320			**320**
280	Generations at Green Valley	165	214	60		**439**
104	Cameron Meadows	161				**161**
143	Dorado Oaks TM Subdiv	156	225			**381**
25	Green Valley Road					**54**
8	Serrano Village M5					**20**
5	Bass Lake Fly Apts		124	2		**126**
40	EDH - Golf Course (estimate remaining)					**500**
5	Country Club Apts		192			**192**
6,434	**TOTAL Future projects**	**6,151**	**3,242**	**2,089**	**1,756**	**15,270**
1614	Texas Hill Reservoir					
?	Heritage at Carson Creek					
	PROJECTS IN PIPELINE	**6,151**	**3,242**	**2,089**	**1,756**	**17,026**

Note: This tabulation of projects assumes that as of 2020, about 1756 units remain to be sold.
This assumption IS NOT one made by the EDC Planning Department.
It is a crude estimate of the inventory to sell from approved and currently selling projects in the area.

To be clear, projects in the EDH area currently undergoing CEQA total to 15,270 residential units.
The total EDUs were not calculated due to the complexity of the proposed
and existing commercial zoning in the area.
However, for estimating total water needs, as a coarse rule of thumb to estimate the total EDUs for the area,
one should add at least 30% to the 15,270 units identified, or 19,851 EDUs

East Ridge (Valley View)

On December 8, 1998, the Board adopted Ordinance No. 4517 approving the VVSP and certified the Environmental Impact Report (EIR) (State Clearing House No. 97082008) for the VVSP. The VVSP is a master planned community consisting of approximately 2,037 acres and including approximately 2,840 dwelling units. On that same date, the Board approved the 1998 VVSP Development Agreement (VVSP DA) (Exhibit H).
The East Ridge Village Tentative Subdivision Map (TM14-1521) (Exhibit E) would create approximately 759 lots consisting of 701 residential lots, 41 landscape lots, 12 roadway lots, 2 recreational park lots, a sewer lift station lot, a water tank lot, and a pump station lot
East Ridge Village is within the Valley View Specific Plan and has an approved Tentative Subdivision Map (TM14-1521), approved by the Planning Commission on June 11, 2015, that would create approximately 759 lots **consisting of 701 residential lots**, 41 landscape lots, 12 roadway lots, 2 recreational park lots, a sewer lift station lot, a water tank lot, and a pump station lot. The project has an approved and executed Development Agreement (DA22-0001) which was approved by the Board of Supervisors on July 25, 2023.



MARBLE VALLEY: Project Overview

Village of Marble Valley Specific Plan proposes for the development of 2,342 acres of land consisting of approximately **3,236 dwelling units and 475,000 square feet of commercial land**. The project is located in between El Dorado Hills and Cameron Park area south of Highway 50.

Land use	Parcels #	Zoning	Area (Ac)	Units	Gross Density
		*sq.ft.'000			
Village Resid. Low	1A+1B+1C+1D+1F	R15-PD	197.0	193	0.98
Village Resid. Low	1E	R10-PD	63.0	125	1.98
Village Resid. Low	2a+2b+2c+2d+2e+2f	R6-PD	305.0	1085	3.56
Village Resid. Low	2G	R4-PD	120.0	560	4.67
Village Resid. Low		**R4>15-PD**	**685.0**	**1963**	**2.87**
Medium Resid.	3a+3b+3c	RM1-PD	84.0	708	8.43
Medium Resid.	4a+4b+	RM2-PD	28.0	501	17.89
Medium Resid.			**112.0**	**1209**	**10.79**
TOTAL RESIDENTIAL			**797.0**	**3,172**	**3.98**
Office Park	4a+4b	C1-PD	41.0		9,146
Village Comm.	6b+6c+6d+6e	C2-PD	7.0		3,571
Village Comm.	6a	C1-PD	9.0	50	833
Commercial			**57.0**	**50**	7,149
AG.TOUR -Viyd	7a+b+c+d+e+f+g+h+i-	AT1-PD	55.0	14	0.25
TOTAL RESIDENTIAL PLANNED			**909.0**	**3,236**	
Public Schools	8a	RM2-PD	19.0		
Public Schools	8b	R4-PD	16.0	75	4.67
SCHOOLS			**35**	**75**	
VILLAGE PARK			47.0	261	40.5
Public Utilities	10a	R15-PD	5.0	5	0.98
PUBLIC UTILITY			**5.0**	**4.9**	0.98
PUBLIC FACILITIES			**87.0**	**340.2**	
Commu.Open Sp.	11-a (N.Deer Crk)	OS1-PD	743.0		
	11b-Hy 50 Scenc	OS1-PD	75.0		
Private Op.Sp.	11c- Foundation	OS2-PD	466.0		
TOTAL OPEN SPACE			**1,284.0**		
ROAD IMPACT AREA	**Right of Way**	**ROW**	**61.0**		
			2,341.0	**3,576.2**	

Table prepared by Alastair Dunn from Marble Valley grom the DEIR. The proponent sites 3236 units, to which an additional 340 units are added due to zoning request to total 3576 units.

Lime Rock Valley Specific Plan
APNs: 109-010-013, 109-010-014, 109-020-001, 109-020-004, 109-020-005, 109-020-006, 119-030-013

The County of El Dorado will host an open house to present a general overview and environmental information of both the Village of Marble Valley and Lime Rock Valley projects. The meeting will be held in-person on **Tuesday, June 11, 2024, from 5:30 p.m. to 7:30 p.m. in the Assembly Hall at the Cameron Park Community Services District Community Center,** 2502 Country Club Drive, Cameron Park, CA 95682. For more inforfmation please click here: Lime Rock Valley Specific Plan Notice of Availability of the DEIR - El Dorado County (ca.gov)(External link)

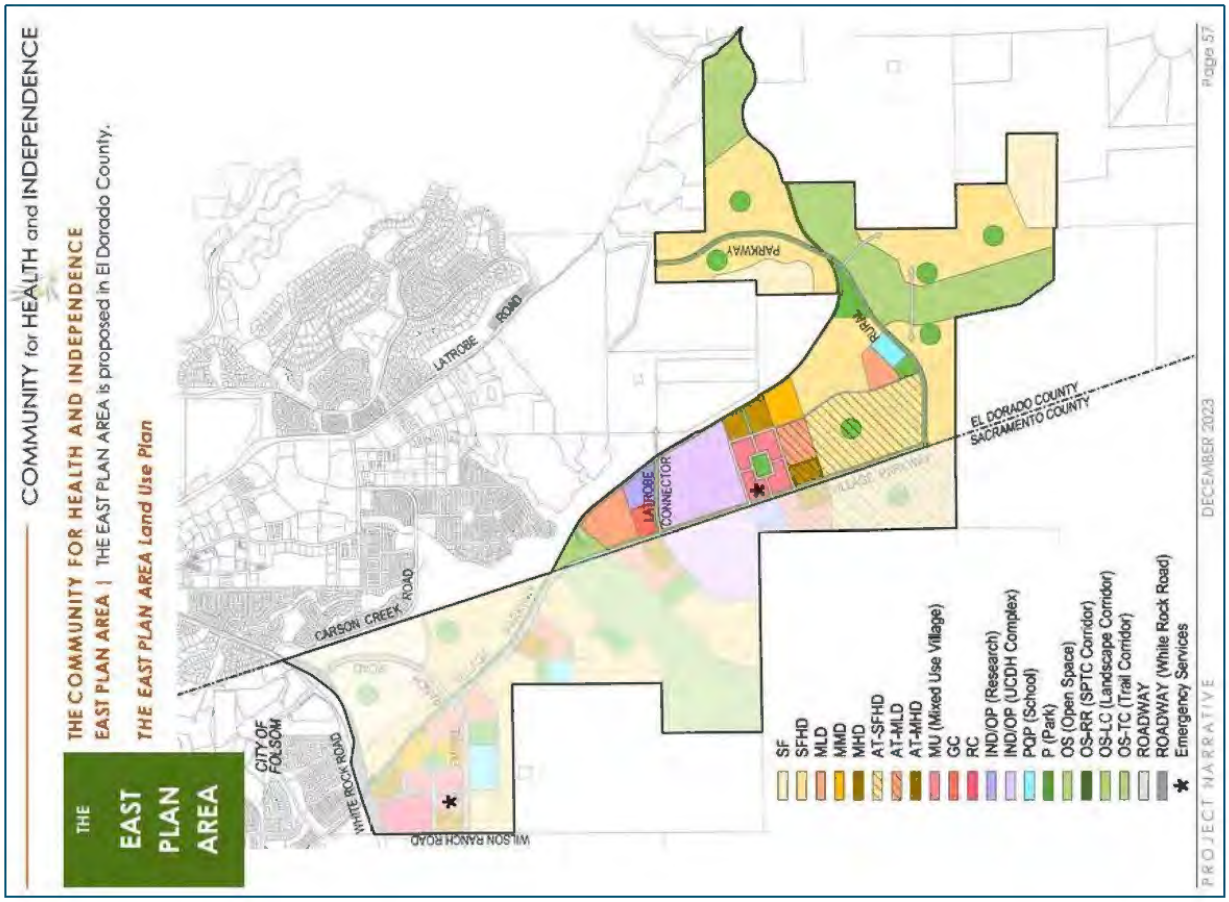
Land Use Designation		Zoning	Area (Ac)	% Plan Area	Units
Residential					
LRL	*Lime Rock Residential Low (0.2 - 5.0 Du/Ac)*				
	Parcels 15, 37, 40, 43, 46	RSA-PD	121	16%	22
		R2.5A-PD	11	2%	3
	Parcels 4, 31, 32	R1A-PD	34	5%	30
	Parcels 9, 10, 12, 33, 34	R15-PD	81	11%	180
	Parcels 19, 20, 21, 22, 23, 24, 35, 39, 41, 45	R10-PD	27	4%	84
	Parcels 1, 28, 29, 30	R6-PD	48	6%	231
	Parcels 17, 18, 25, 26				
LRM	*Lime RockResidential Medium (5.0 to 8.0 Du/Ac*				
	Parcel 7	R4-PD	36	5%	250
	Subtotal Residential		**358**	**49%**	**800**
Public Facilities					
VP	*Village Park*				
	Parcel 5	R15-PD	8	1%	
	Subtotal Public Facilities		**8**	**1%**	
Open Space					
OS	*Community Open Space*				
	Parcels 2, 3, 6, 8, 11, 13, 14, 27, 36, 38, 42, 44, 47	OS1-PD	211	29%	
OS	*Foundation or Private Open Space*				
	Parcel 14	OS2-PD	124	17%	
	Subtotal Open Space		**335**	**45%**	
Road Right-of-Way			**39**	**5%**	
Total			**740**	**100%**	**800**

Proposed development of 800 dwelling units, 15 acres of public facility/recreational park use, and 335 acres of open space on an approximately 740-acre site. The current zoning is Estate Residential Ten Acre-Planned Development (RE-10-PD), Residential Agricultural-20 and Residential Agricultural-40 Districts, and Open Space (OS). The current General Plan land use designation for the project site is Rural Residential (RR) and Open Space (OS). The project would require a general plan amendment to Adopted Plan-Lime Rock Valley Specific Plan (AP-LRVSP) and LRVSP land use designations Low Density Residential (LDR), Village Park (VP), and Open Space (OS) and a rezone to LRVSP zone districts One-Acre Lot Residential-Planned Development (R1A-PD), 15K SF Lot Residential-Planned Development (R15-PD), 10K SF Lot Residential-Planned Development (R10-PD), 6K SF Lot Residential-Planned Development (R6-PD), Private Open Space-Planned Development (OS1-PD), Public Open Space-Planned Development (OS2-PD), and Preserve-Open Space Planned Development (OS3-PD). The project would establish a Development Agreement and Specific Plan for Lime Rock Valley.

COMMUNITY HEALTH INDEPENDENCE

AKT Development and UC Davis Health submitted a proposal to both El Dorado County and the City of Folsom on Friday December 22, 2023 for a project described as a "Community for Health and Independence" that would provide a residential development for healthy senior communities, and residential housing for disabled residents. **The project proposes 4000 residential housing units in Sacramento County, and 4000 residential housing units in El Dorado Hills.**

Pre-Application for Community for Health and Independence Specific Plan
APNs: 117-020-005, 087-010-018, 117-020-012, 117-020-017, 117-020-010, 087-070-007, 117-020-018, 087-010-021
Pre-Application and BOS Policy J-6 Conceptual Review for a General Plan Amendment request to change multiple parcels from Agricultural Lands (AL) and Rural Region (RR) to Approved Plan through Specific Plan adoption to include residential, age-targeted residential, mixed-use, commercial, industrial/office park, and open space. Guided by UC Davis research, the project is designed to promote healthy living through project design and includes a 200-acre research complex. **The property consists of 8 parcels totaling approximately 1,460 acres and is located approximately** 3 miles south of State Highway 50, along the eastern County border with Sacramento County, in the El Dorado Hills area, Supervisorial District 1.



THE EAST PLAN AREA Land Use Summary Table

EAST PLAN AREA		
Land Use	**Gross Area (Acres)**	**Dwelling Units**
Residential		
SF (1-4du/ac) Single Family	105.3	295
SFHD (4-7du/ac) Single Family High Density	490.2	2157
MLD (7-12du/ac) Multi-Family Low Density	46.8	337
MMD (13-20du/ac) Multi-Family Medium Density	19.3	232
MHD (20-30du/ac) Multi-Family High Density	19.5	311
Subtotal Traditional Residential	***681.1***	***3,332***
Age-Targeted Residential		
AT-SFHD (4-7du/ac) Age-Targeted Single Family High Density	119.5	526
AT-MLD (7-12 du/ac) Age-Targeted Multi-Family Low Density	20.0	144
AT-MHD (20-30du/ac) Age-Targeted Multi-Family High Density	10.0	160
Subtotal Age-Targeted Residential	***149.5***	***830***
Mixed-Use		
MU (9-30du/ac & 0.5 FAR) Mixed-Use Village *(Assumes 25% Residential / 75% Commercial)*	32.0	144
Subtotal Mixed-Use	***32.0***	***144***
Commercial, Employment & Civic		
GC (0.5 FAR) General Commercial	10.0	
IND/OP Complex (1.0 FAR) Industrial/Office Park UCDH Complex	100.0	
IND/OP Research (0.5 FAR) Industrial/Office Park Research	15.0	
PQP (0.5 FAR) Public/Quasi-Public Public Schools	10.0	
Subtotal Commercial & Employment	***135.1***	
Parks & Open Space		
P Parks	53.4	
OS Open Space	306.6	
OS-RR Open Space Rail Road Parcels	4.5	
OS Open Space Landscape/Trail Corridor	51.4	
Subtotal Parks & Open Space	***416.0***	
Circulation		
Major Circulation	46.2	
Subtotal Circulation & Misc	***46.2***	
EAST PLAN AREA TOTAL	**1,459.9**	**4,306**

Land Use Designations and Park & Population Generation Factors are based on the El Dorado County General Plan.

THE WEST PLAN AREA Land Use Summary Table

WEST PLAN AREA		
Land Use	**Gross Area (Acres)**	**Dwelling Units**
Residential		
SF (1-4du/ac) Single Family	131.9	369
SFHD (4-7du/ac) Single Family High Density	379.3	1669
MLD (7-12du/ac) Multi-Family Low Density	66.9	481
MMD (13-20du/ac) Multi-Family Medium Density	25.9	311
MHD (20-30du/ac) Multi-Family High Density	40.7	651
Subtotal Traditional Residential	***644.7***	***3,481***
Age-Targeted Residential		
AT-SFHD (4-7du/ac) Age-Targeted Single Family High Density	136.3	600
AT-MLD (7-12 du/ac) Age-Targeted Multi-Family Low Density	22.4	161
AT-MHD (20-30du/ac) Age-Targeted Multi-Family High Density	10.0	160
Subtotal Age-Targeted Residential	***168.7***	***921***
Mixed-Use		
MU (9-30du/ac & 0.5 FAR) Mixed-Use Village *(Assumes 25% Residential /75% Commercial)*	24.1	108
Subtotal Mixed-Use Village Residential	***24.1***	***108***
Commercial, Employment & Civic		
RC (0.5 FAR) Regional Commercial Lifestyle Center	30.1	
IND/OP Complex (1.0 FAR) Industrial/Office Park UCDH Complex	100.0	
IND/OP Research (0.5 FAR) Industrial/Office Park Research	15.0	
PQP (0.5 FAR) Public/Quasi-Public Public Schools	30.0	
Subtotal Commercial & Employment	***175.1***	
Parks & Open Space		
P Parks	56.6	
OS Open Space	233.2	
OS-RR Open Space Rail Road Parcels	13.0	
OS Open Space Landscape/Trail Corridor	36.8	
Subtotal Parks & Open Space	***339.6***	
Circulation		
Major Circulation	41.8	
SEC R.O.W. (White Rock Road)	22.5	
Subtotal Circulation & Misc	***64.2***	
WEST PLAN AREA TOTAL	**1,416.32**	**4,511**

Land Use Designations and Park & Population Generation Factors are based on the Folsom Plan Area Specific Plan.

Creekside (Winn Communities)

APNs: 117-720-012 & 117-010-032

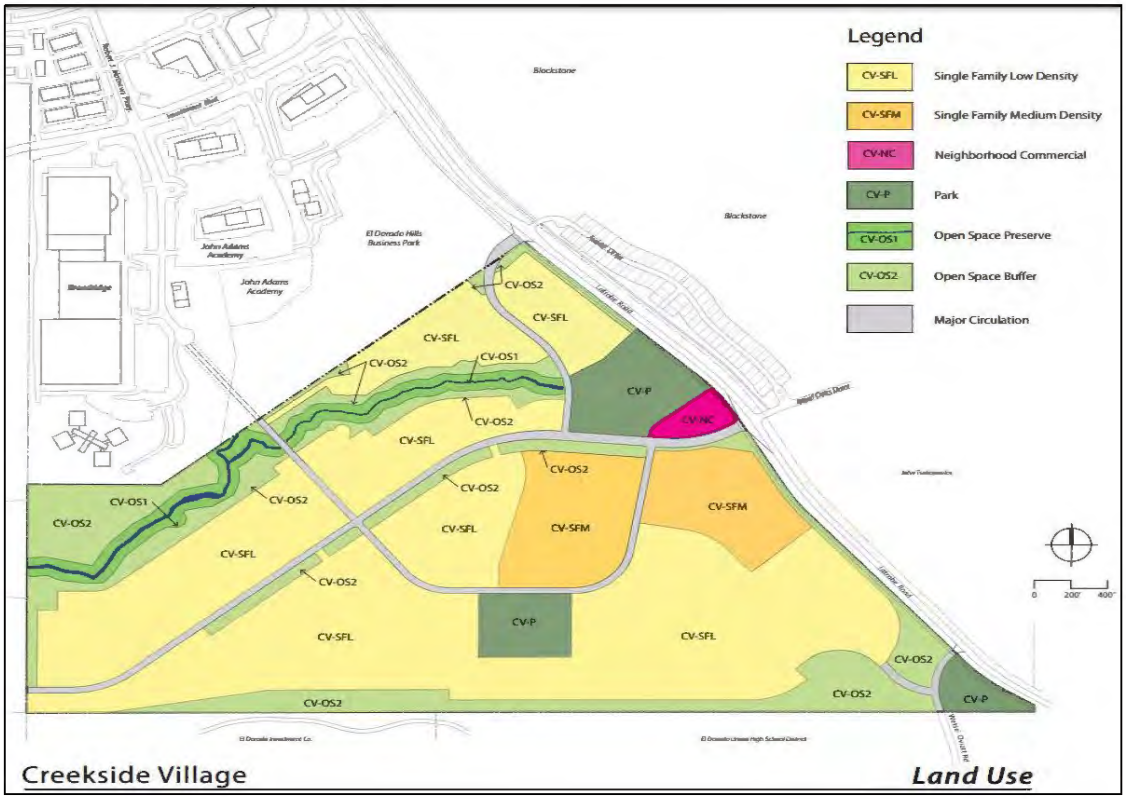
Proposed development of a new 918-unit residential community located on an approximately 208-acre site. The project would include **115.8 acres of approximately 668 Single-Family Low-Density** residential development, **20.8 acres of approximately 250 Single-Family Medium-Density residential development**, 1.8 acres of Neighborhood Commercial, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, and 10.4 acres of roadways. The proposed land use map is provided in the linked PDF. The current zoning and General Plan land use designation for the project site is Research & Development (R&D). The project would require a general plan amendment from R&D to AP - Adopted Plan, a rezone from R&D to SP - Creekside Village Specific Plan, a subdivision map, and establish a Development Agreement and Specific Plan for Creekside Village.

Creekside Village submitted by WINN COMMUNITIES for an Initiation Hearing (Conceptual Review) of a proposed new Specific Plan that would require amending the General Plan land use designation of a de-annexed portion of the El Dorado Hills Business Park from the current Research and Development to residential land uses to allow medium- and low-density single family residential development at a density of 5-24 units per acre with an expected **range of 700 to 900 dwelling units.** The property, identified by Assessor's Parcel Number 117-010-012, consisting of 208 acres, is located on the west side of Latrobe Road, approximately 1,600 feet south of the intersection with Investment Boulevard, within the El Dorado Hills Business Park, in the

El Dorado County Planning and Building Department issues Notice of Second Scoping meeting and early consultation with public for Draft EIR

The El Dorado County Planning Department has provided a Notice of a second Public Scoping Meeting for the proposed Creekside Village development located along Latrobe Road in El Dorado Hills. The first Public Scoping meeting was held virtually on November 19, 2020 regarding the proposed 208 acre site that would feature up to 918 units of low and medium density single family residential development. Following that November 2020 Scoping meeting, the County held a 30 day public comment period, with the expectation that the Draft Environmental Impact Report analysis would begin. However in October 2021 the applicants requested that the project application be placed on hold. Following this, Dermody Development sought to purchase the project site for the proposed Project Frontier 4-plus million square foot distribution center. With the withdrawal of the Project Frontier application, the property owner has engaged in discussions with multiple area Homeowners Associations to **gather feedback regarding their previous residential project**. Those discussions have led the property owner to reactivate their Creekside Village residential project.

The project applicant proposes to develop a 918-unit residential community located on an approximately 208-acre site. The Project remains consistent with the description in the Notice of Preparation with minor revisions, including the addition of an approximately 1.8-acre neighborhood commercial area in response to requests from the community to add a small neighborhood commercial component and the removal of 8 proposed units. The project would include 115.8 acres of single-family low-density residential development, 20.8 acres of single-family medium-density residential development, 13.6 acres of parks, 44.8 acres of open space preserves and buffers, 1.8 acre of neighborhood commercial, and 11.1 acres of roadways.



El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

Carson Creek

This proposed Specific Plan would allow **medium and high-density attached and detached residential development with a potential build-out of 600 to 800 dwelling units, approximately 110,000 square feet of new commercial floor** area, approximately 8.5 acres for a park and paseo site, and approximately 26.5 acres of open space. **The property consists of 98 acres and** is located within the existing El Dorado Hills Business Park (EDHBP) in the El Dorado Hills area. S

Executive Summary Pursuant to Board Policy J-6, this Initial Hearing is for the conceptual review of a proposed new Specific Plan in the El Dorado Hills Area that w**ould increase the allowable residential density by more than 500 dwelling units.** The proposed Specific Plan (Carson Creek Village) would amend a de-annexed portion of the El Dorado Hills Business Park (EDHBP) from the current General Plan land use designation of Research and Development to a combination of residential, commercial, and park/open space land uses. **The proposed future project would include approximately 47 acres of medium and high-density residential development, including both single-unit and multi-unit housing types, 10 acres of commercial uses**, 8.5 acres of park lands and 26.5 acres of passive open space on a 98-acre parcel, with a potential residential build-out of approximately 600-800 attached and detached dwelling units. Approximately 1.5 acres of existing Research and Development designated land along the southwest project boundary would remain, and these areas of land are included in the proposed Specific Plan.

~~Town Center West- Mixed Use Proje~~ct

Requires the Initiation Hearing because it ~~proposes a Specific Plan amendment to allow Mixed Use Development to occur in the Specific Plan area~~, which would result in a proposed ~~density increase of over 50 units.~~ The existing El Dorado Hills Specific Plan and Development Plan for El Dorado Hills Town Center West allow commercial uses only.

The proposed Town Center West Mixed Use Project contemplates a potential addition of 20 residential units per acre over 116 acres, for a maximum of 2,340 residential units, consistent with the density allowed in Zoning Ordinance Section 130.40.180, Mixed Use Development. **The Applicant intends to develop approximately 47 acres of Town Center West which would have a potential maximum of 940 residential units**.

MONSANTO MANOR

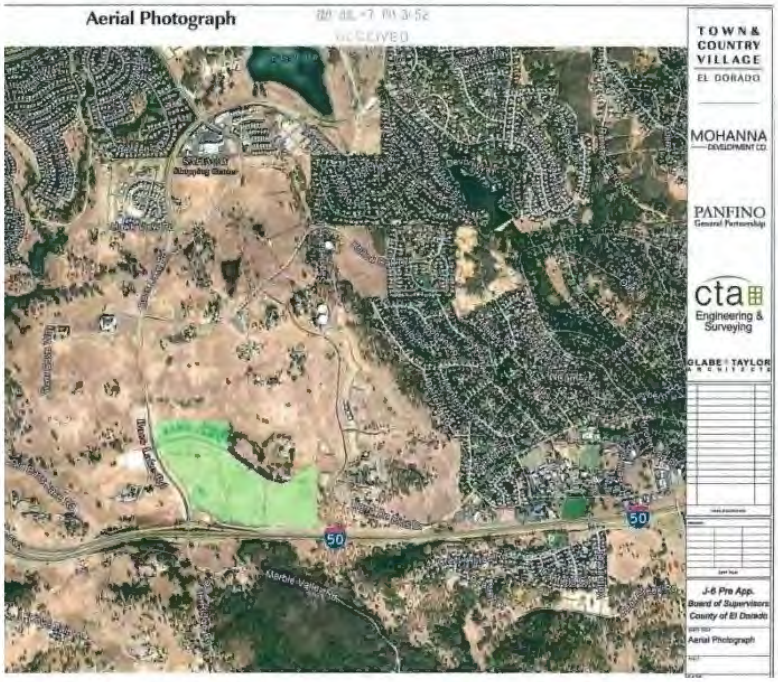
TOTAL 320 MULTI FAMILY UNITS

From the Pre-Application Supplemental Letter

We believe Montano De El Dorado is the prime "Mixed Use" project for this new trend and the future of El Dorado Hills living at this key area where EDH Town Center & Montano meet. This project will lend itself to the encouragement of the walkable path to goods and services directly from the residential front door in a horizontally Mixed-Use environment. Montano currently offers restaurants, banking, spa services, boutiques, morning coffee, and Pilates/fitness services. We are strategically located just one crosswalk away from EDH Town Center where the walkable path continues to movies, shopping, community events and much more.

In closing, while the El Dorado County "Mixed-Use" code and its (Mixed-Use Handbook) primarily focusses on historical revitalization -we ask that you consider the modern definition of "mixed-use" in a well-thought-out setting where the interaction of residential and commercial components can thrive as "a combined use" in an environment where driving can be the choice and a secondary thought. We ask that within the ministerial capacity of the Planning Administrator -Mixed-Use may be added to our Masterplan Entitlements of August 10, 2021.

~~Town & Country Village (Mohanna)~~



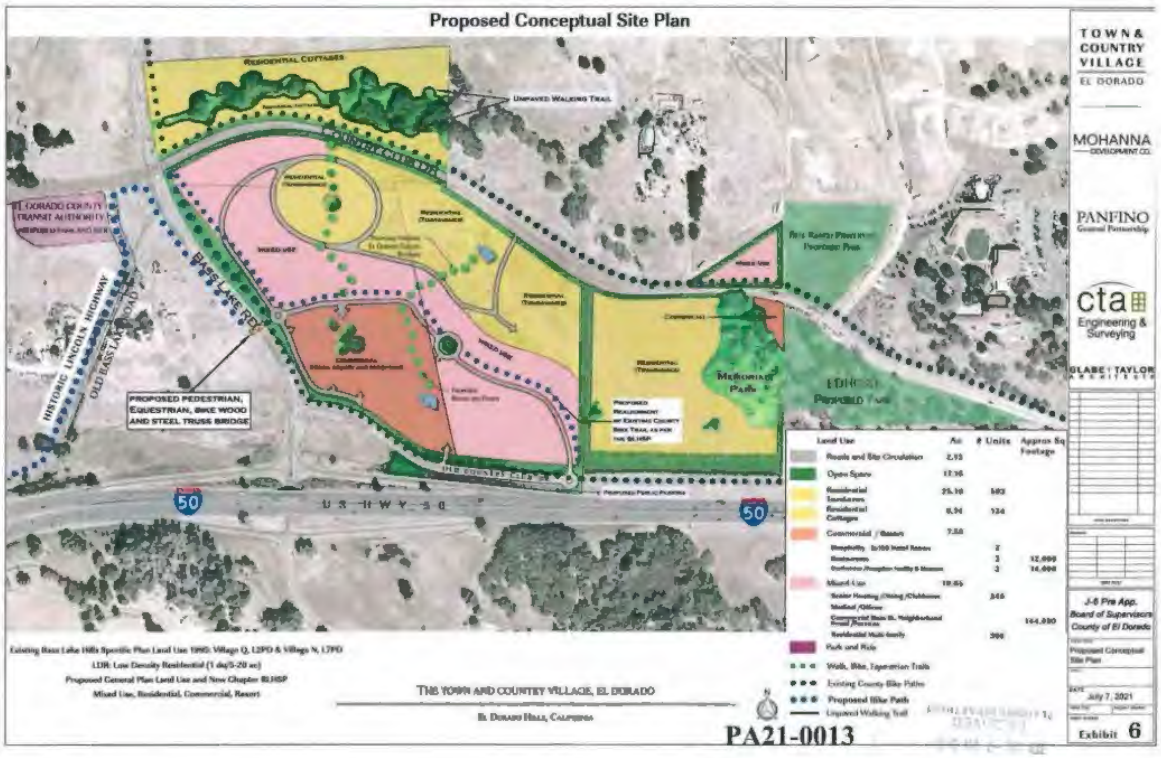


Exhibit B: Conceptual Land Use Matrix - Town & Country Village Pre-Application (PA21-0013)

		Ac.	Unit/Ac.	# Units	Approx. Sq Footage	Present Zoning 1995 Land Use BLHSP
	Roads and Site Circulation	2.13				
	Open Spaces	17.16				L7PD* / L2PD**
	Residential Townhomes	25.16	20	503		L2PD
	Residential Cottages	6.74	20	134		L7PD
	Commercial / Resort	7.55				L2PD
	Hospitality 2X150 Hotel Rooms 300					
	Restaurants 3				12,000	
	Conference/Reception Facility & Museum				14,000	
	Mixed-Use	19.65				L2PD / L7PD
	Senior Housing/Dining/Clubhouse		-	245		
	Medical/Offices					
	Commercial Main St. Neighborhood Retail/Services				144,000	
	Residential Multi-Family		24	390		
	Total	78.39		1,272	170,000	

* L7PD : Low Density Residential Planned Development Maximum 0.7 Units Per Acre (1.42 Acres Per Unit) Average Density

** L2PD : Low Density Residential Planned Development Maximum 0.2 Units Per Acre (5 Acres Per Unit) Average Density

- Townhomes = 503 Un.
- Cottages= 134 Un.
- Senior Housing= 245
- Residen. Mul.Fly.= 390
- **TORAL= 1272 Units**

Generations at Green Valley

Generations at Green Valley Project

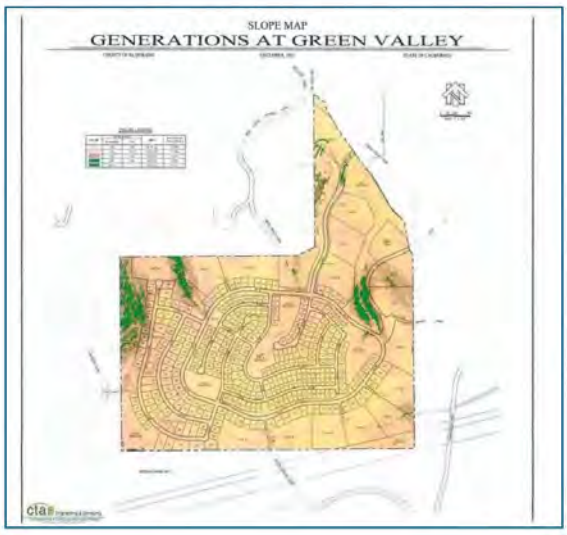
APNs: 126-020-001, 126-020-002, 126-020-003, 126-020-004, and 126-150-023

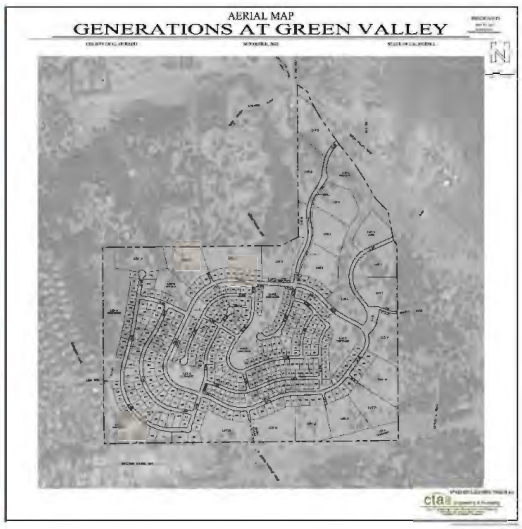
Generations @ GV; Submitted by True Life Companies for an Initiation Hearing (Conceptual Review) for a General Plan Amendment from Low-Density Residential to Medium- and High-Density residential consistent with General Plan Policy 2.2.1.2 for Low-Density Residential. **The Project would require future rezone and 439 residential lot tentative subdivision** map discretionary approvals

The Generations at Green Valley project proposes a General Plan Amendment GPA22-0001, Rezone Z22-0001, and Tentative Subdivision Map TM22-0001, to amend the General Plan land use designations from Low Density Residential (LDR), with approximately 1.4 acres designated Open Space (OS) associated with an existing Sacramento Municipal Utility District (SMUD) utility easement, **to High Density Residential (HDR**), **Low Density Residential (LDR), and Public Facilities (PF);** and a Rezone from Residential Estate, Ten-acre (RE-10), with the SMUD easement zoned as Recreational Facilities, Low Intensity (RF-L), the proposed C-Drive extension area is zoned Residential Estate, Five-acre (RE-5), and the proposed A-Drive Extension is RE-10, to Residential, Single-unit (R1), Open Space (OS), Recreational Facilities, High Intensity (RF-H), and Residential Estate, Five-Acre (RE-5); and a Tentative Subdivision Map to subdivide the -acre project site into **379 residential lots**, clubhouse lot, park site lot, thirteen landscape lots, nine (9) open space lots, and three (3) lots for project roadways.

Age restrictions would apply to 214 of the residential lots.

The project encompasses approximately 280-acres located on five current parcels, Assessor's Parcel Numbers (APNs) 126-020-001, 126-020-002, 126-020-003, 126-020-004, and 126-150-023, and is located on the south side of Green Valley Road approximately 100 feet southeast of the intersection with Malcom Dixon Road, in the El Dorado Hills area, in Supervisorial District 1. The proposed project includes a Development Agreement, DA24-0001. This project has been identified as a project requiring an Environmental Impact Report (EIR). There will be additional review and comment periods throughout the CEQA process.



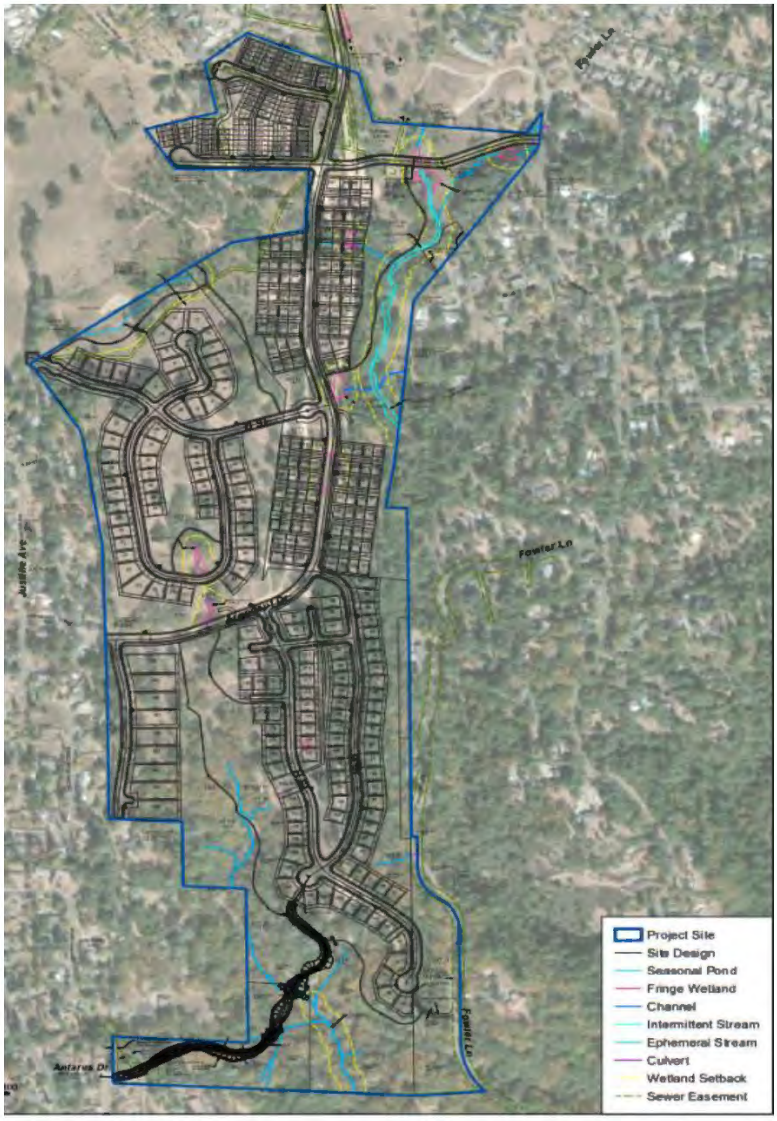


Dorado Oaks Tentative Subdivision Map

A Rezone (Application # Z19-0005) of an approximately 18.1-acre portion of the approximately 142.5-acre project site from Residential, Multi-Unit (RM) to Residential, Multi-Unit - Planned Development (RM-PD), in accordance with the El Dorado County Zoning Code;

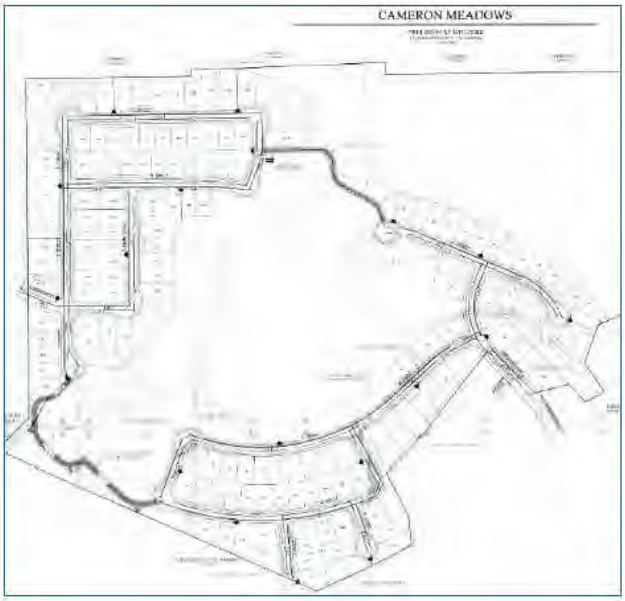
A Phased Tentative Subdivision Map (Application # TM18-1538), to subdivide the property into 14 Large Lots for financing and phasing purposes**, 156 single-family lots ranging in size from 6,000 square feet to approximately 24,000 square feet, 225 multi-family lots ranging in size from approximately 2,000 square feet to 7,170 square feet** ; one single-family lot of approximately 6.4 acres; seven roadway lots; and 18 open space/landscape lots open space/landscape lots in accordance with the El Dorado County Subdivision Ordinance;

- SFD lots = 156 units
- MFly Units= 225
- **Total= 381 units**



Cameron Meadows
APN: 070-011-051
A Tentative Subdivision Map that seeks to utilize the Housing Accountability Act, the Housing Crisis Act (also known as Senate Bill 330 [SB 330]), and the State Density Bonus Law.
The proposed project would **create 161 single-family residential lots ranging in size from 6,300 square feet (sf) to 16,668 sf**.

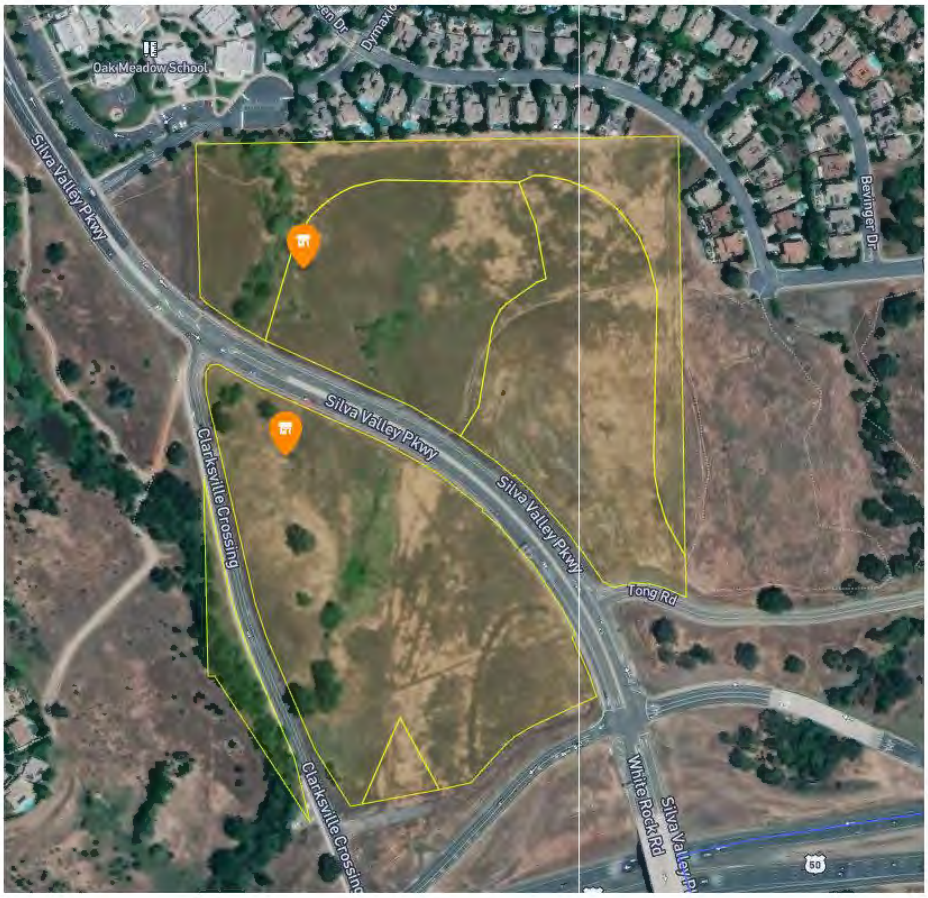
Sixteen of the lots would include an attached Accessory Dwelling Unit (ADU). The ADUs, which represent ten (10) percent of the total dwelling units, are proposed to be deed-restricted to low-income households, thereby qualifying the project to utilize the State Density Bonus Law. The proposed project would result in a density of 1.55 dwelling units per acre, which is within the 1-5 units per acre allowed in the High Density Residential (HDR) land use designation of the General Plan. Rasmussen Pond is located on the property. The property, identified by Assessor's Parcel Number (APN) 070-011-051, **consists of 104-acres**, and located adjacent to Rasmussen Park, east of Mira Loma Drive and north of Carousel Lane, in the Cameron Park area, Supervisorial District 2. This project has been identified as a project requiring an Environmental Impact Report (EIR). There will be additional review and comment periods throughout the CEQA process.



2525 Green Valley Road
PA22-0018
December 14, 2022 in GENERAL PLAN AMMENDMENT, PA22-0018, RESIDENTIAL DEVELOPMENT, REZONE
25.43 acres Green Valley Rd at Silver Springs Pkwy
Rezone from RL-20 (rural lands) to R1 (residential single unit)
General Plan Amendment from Rural Residential (RR) to High Density Residential (HDR)
54 Lots from 0.25 acres to 0.51 acres
LOT A – Preservation of 4.25 acre pond
LOT B – Donation of 0.87 acres (Pleasant Grove House)

EDH 52 Mixed-Use Center
APNs: 122-720-002, 122-720-018, 122-720-019, 122-720-020, and 122-720-021

Proposed development of a new mixed-use development located on both sides of Silva Valley Parkway on approximately **43.26 acres.**
The project would include 304 multi-family residences provided within five 4-story buildings and 14,000 square feet (sf) of retail building space contained within two buildings on the north side of Silva Valley Parkway (North Site) on 24.83 acres,
and an approximately 165,000 sf warehouse retail center on the south side of Silva Valley Parkway (South Site) on 18.43 acres.
The current zoning on the project site is predominantly Commercial, Regional – Planned Development (CR-PD), with small portions on the South Site zoned Commercial, Limited (CL), and Transportation Corridor (TC), and the General Plan land use designation for the project site is Commercial (C).
The project would require: Rezones from CR-PD to Multi-unit Residential – Planned Development (RM-PD) on the North Site and from CL and TC to CR-PD on the South Site; **a planned development for 304 multi-family residences,** 14,000 square feet (sf) of general commercial retail, and 165,000 sf of warehouse commercial retail; a conditional use permit for the establishment of an on-site master sign program; a variance for an increase in sign height and signage area from what is currently allowed in the Zoning Code; a parcel map to subdivide the three existing parcels on the North Site into five parcels ranging in size from approximately 0.94 acres to 9.3 acres in size.



Share Texas Hill Reservoir

Parcel Rezone and General Plan Amendment Project Z24-0002/ GPA 24- 0001
Consists of a ~~County-initiated General Plan Amendment and Rezone for 120 parcels within the site of the formerly proposed Texas Hill Reservoir including~~: The project site, consisting of approximately 1,614 acres, is located on the north side of Pleasant Valley Road at the intersection with Big Cut Road, approximately 1.7 miles south of the City of Placerville,

TEXAS HILL PARCEL REZONES AND GENERAL PLAN AMENDMENT PROJECT LOCATION MAP

El Dorado Hills & Cameron Park Projects Area Date: 24 June 2024 24 June 2024

Bass Lake Family Apartments

A Pre-Application for Bass Lake Family Apartments, an affordable housing project that seeks to utilize SB 330 and AB 2011 to provide 100% **affordable housing project comprised of 126 apartments with 124 of the apartments reserved for low-income households and two (2) manager's units**. The project includes five (5) buildings totaling 122,508 sq. ft. The proposed project is 100% affordable and eligible for Density Bonus Concessions. The Applicant requests a concession to allow 0% commercial floor area (GFA), whereas a minimum of 30% GFA is typically required as a commercial use in the Commercial Zones. The proposed project would be eligible for up to an 80% Density Bonus. The Applicant requests a +/- 25% Density Bonus. The project includes landscaping and 170 parking spaces. The property, identified by Assessor's Parcel Number 115-410-011, **consists of 5.27 acres**, and is located on the southwest side of Green Valley Road & Bass Lake Road.

Country Club Apartments

Approval of this Parcel Map would result in the creation of four parcels as follows: 4.52 acres (Parcel One), 4.45 acres (Parcel Two), 1.95 acres (Parcel 3), and 4.5 acres (Parcel Four). The resultant parcels meet the required development standards in the RM zone including minimum parcel size and parcel width. Approval of the Design Review would allow the construction and **ongoing occupancy of a 192-unit residential apartment complex** to include parking lot, landscaping, and accessory residential amenities. The proposed parcel map and design review would result in the creation of parcels for development of a multi-family residential apartment complex To be leased at affordable housing rates.

Share Serrano Village M5 Project

APNs: 123-020-023

Proposed development of a **new 20-unit residential subdivision on 20 lots, ranging in size from 7,000 to 19,763 square feet, located on an 8.42-acre site.** The project would include single-family attached residential development and open space, in addition to roadway improvements and new utility hook-ups. The proposed map is provided in the linked PDF. The current zoning of the project site is Single-unit Residential, minimum lot size 20,000 square feet (R20K) and the General Plan land use designation for the project site is AP (Adopted Plan). The project would require a Subdivision to 20 lots ranging in size from 7,000 sf to 19,763 sf, a Zone Change from R20K to R1-PD (Single-unit Residential, Planned Development Combining Zone) and OS (Open Space), and a Planned Development to add the PD overlay to the Zone Change.

Green Valley Road
PA22-0018 2525
December 14, 2022 in GENERAL PLAN AMMENDMENT, PA22-0018, RESIDENTIAL DEVELOPMENT, REZONE
25.43 acres Green Valley Rd at Silver Springs Pkwy
Rezone from RL-20 (rural lands) to R1 (residential single unit)
General Plan Amendment from Rural Residential (RR) to High Density Residential (HDR)
54 Lots from 0.25 acres to 0.51 acres
LOT A – Preservation of 4.25-acre pond
LOT B – Donation of 0.87 acres (Pleasant Grove House)

CAMERON PARK COMMUNITY SERVICES DISTRICT
2502 Country Club Drive – Cameron Park – California – 95682
530-677-2231

June 5, 2024

Robert J. Peters, Deputy Director of Planning
Robert.Peters@edcgov.us

> Re: Your email of May 23, 2024, notifying CPCSD the County is processing a Development Agreement for the proposed Village of Marble Valley and Lime Rock Village (DA 14-0002/DA 14-0004 and requiring the District to submit its requests by COB June 7, 2024

Deputy Director Peters,

I am the GM of Cameron Park Community Services District (CPCSD). I have been involved in planning and developments in multiple utility industries and in leading four prior governments. I have never seen an obviously impacted party that borders both developments appearing to be the only one in this County excluded from prior considerations. The CPCSD only recently heard from the developer that the projects were now active. The Planning Department's decision or oversight to not speak directly with the CPCSD about current and future impacts before writing the EIRs was a disservice to the residents of Cameron Park.

The draft EIR for Marble Valley does not identify, consider, or suggest mitigations for the real impacts that would occur on CPCSD. In addition, I just saw the Lime Rock draft EIR issued a week ago also does not identify, consider, and suggest mitigations for the real actual impacts that would occur on CPCSD. Nothing in these documents portrays the *current* actual use of CPCSD's recreational facilities that occurs in our lake, parks, sports, and aquatic facilities by people who live outside the CPCSD boundaries. Nor do they include the impact these projects will have on Station 89 of our fire service. If these projects are approved, it will further exacerbate the demand for services without any additional funding to support such demand.

After failing to include the *current* impacts from our neighboring districts in each EIR before adding the real ones from the new projects, on May 24, 2024, the CPCSD received the following in an email from you:

> The County is processing a Development Agreement (DA) with the applicants for the proposed **Village of Marble Valley and Lime Rock Village (DA14-0002/DA14-0004)** projects. The DA is an agreement adopted by ordinance and negotiated between a developer and the County. If approved, the DA establishes the timing and conditions under which the development may occur. El Dorado County Zoning Ordinance Section 130.58 (Development Agreements) outlines the regulations for establishing a DA within the County.
>
> Your organization may have an interest in providing terms for consideration in the DA process for these projects. However, we cannot guarantee any requested terms will be included in the recommended or final DA.
>
> Please respond to this email with any terms identified for consideration in the DA by **COB Friday, June 7, 2024**.

After no direct contact from the County for the entire time these projects were under active consideration and the EIRs being developed, we were given only two weeks from the receipt of your email notice to respond and list our needs. This lacks any essential fairness or concept of due process.

If these projects are approved, compared to Cameron Park, the two developments will increase housing by about 50% with a similar increase in population. Marble Valley will have some amenities, but nothing like those we have. Our community center, aquatics and parks are within a few minutes of the main entrance so it is reasonable to assume that many Marble Valley residents will use the services of the CPCSD. During a site visit of the Lime Rock site, the developer told us the only amenity would be a small park at the main crossroads. Three existing dirt road exits to the north take a few minutes to exit and will bring Lime Rock residents to us without the long travel through Marble Valley. The main planned back exit from Lime Rock is also close to the CPCSD, and no other similar set of amenities.

The CPCSD already serves substantial elements of El Dorado Hills CSD residents for our aquatics, sports programs, and fully developed lake activities. For example, in swim team usage, the CPCSD recently had 250 residents from Cameron Park and 500 from the EDHCSD. We also know that residents from the development between Bass Road and our western border come to Cameron Park for many of our programs without any of their property tax helping us maintain what they use.

The burden on all our parks, lake activities, intended pickle ball courts and programs from a 50% increase in adjoining housing and population is not sustainable by the

CPCSD. And since these areas are open to the public, we certainly cannot effectively exclude the residents from these projects, nor do we want to do so. Rather, appropriate measures need to be taken to provide sufficient revenue to the CPCSD to support this increased demand.

Further, our Fire Station 89 is the closest one to both projects. Under the County's Mutual Aid Agreement, the closest station always gets the call to respond first. Fire is already our most expensive service; we cannot fund the increased need for medical and fire suppression services for a 50% increase in adjoining housing and population.

The CPCSD's average share of ad-valorem property tax is 13.3%, with some TRA's as low as 3%. Unique to any other special district in El Dorado County, this share of property tax must support all services including fire protection services. Without additional funding to support the new burdens these projects will impose, CPCSD is not sustainable.

CPCSD staff have not had the opportunity to discuss the impacts of these two developments on our community with our Board of Directors so currently the CPCSD does not have an official position on the two developments. However, as the GM I raise these concerns because the increase in services with no additional revenue will render us a dependent district which would fall under the oversight of the Board of Supervisors.

Approximately seven weeks ago at the request of the developer we had started a conversation, but once the EIR was issued they pulled back and have requested that all future discussions occur with the County as the land use authority. We had suggested a deal on a level of impact fees, plus a means of continuing maintenance established now, but subject to the County's approval of the project(s) before any funds changed hands.

Impact fees are likely relatively simple. It is the ongoing funding for continuing maintenance that requires more consideration.

Since Lime Rock is not yet affiliated, despite its current request to join with EDHCSD, the project should come to the CPCSD. By any geographic and access analysis its residents will come to us first to the extent there is not a Marble Valley attraction they want. The development of a maintenance fee for the demand we receive from Marble Valley is open for consideration.

As staff for the CPCSD, we prefer identifying a mechanism that provides one time funding to improve our facilities to meet the expected increased demand if these projects are approved, as well as ongoing funding to address the increased demand on our services.

But, given the individual and total impacts on CPCSD that are NOT recognized or listed for mitigation in the EIRs as required by Appendix G of the State CEQA guidelines quoted below, I suggest they are <u>legally insufficient</u> without a significant formal reexamination.

> "Thresholds of Significance In accordance with Appendix G of the State CEQA Guidelines, the proposed project would be considered to have a significant effect if it would result in any of the conditions listed below. ● Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. ● Require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment."

If the Development Agreements still move forward, we request a seat at the table.

Respectfully submitted,

Alan Gardner, General Manager
Cameron Park Community Services District
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Additional CCs in a separate transmittal:

CPCSD's Board of Directors
All members of the Board of Supervisors
County Administrator's Office
County Auditor
Executive Director of LAFCO
CPCSD General Counsel
Mountain Democrat

El Dorado Hills Area Planning Advisory Committee

APAC 2024 Officers
John Davey, Chair jdavey@daveygroup.net
John Raslear, Vice Chair jjrazzpub@sbcglobal.net
Timothy White, Vice Chair tjwhitejd@gmail.com
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The County of El Dorado Planning Department
Cameron Welch Senior Planner
2850 Fairlane Court
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Sunday July 21, 2024

RE: Lime Rock Valley Specific Plan DRAFT Environmental Impact Report Public Comments

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following comments on the Lime Rock Valley Specific Plan DEIR. Comments were collected from EDH APAC members, El Dorado Hills residents, El Dorado County residents, and residents of Cameron Park.

Where necessary, supporting exhibits are attached as PDF Documents.

Initial Concerns

The Lime Rock Valley Specific Plan has been presented to the community as almost a co-project application along with the Village of Marble Valley Specific Plan. Many of the infrastructure elements, along with environmental mitigation proposed in the DEIRs for both projects' impacts seem to leverage the other project, or facilitate the elements of the other project. Recent community discussion, open house presentations, and review meetings in El Dorado Hills and in Cameron Park, have presented each project as part of a single cumulative review.

In the Lime Rock Valley DEIR it is suggested that where the project relies upon infrastructure, or environmental impact mitigation either provided by the Village of Marble Valley Specific Plan, or entangled between the projects, that in the event of the failure or delay of the Village of Marble Valley Specific Plan to gain adoption of the FEIR, along with project entitlements and approvals, that the Lime Rock Valley Specific Plan project will provide the infrastructure and environmental impact mitigation itself, in full. On its face, this concerns our volunteers and the community as to how the significantly smaller 800 unit Lime Rock Valley Specific Plan

project can provide those project elements in regards to funding the infrastructure/environmental impact mitigation, and how that would impact the infrastructure/environmental impact mitigation timing, likely with considerable delays, as the Lime Rock Valley Specific Plan indicates a potential build out over 20-25 years, and the much larger 3200 unit Village of Marble Valley Specific Plan DEIR suggests a build out over 19 years.

Even though it is the preference of EDH APAC that the projects be treated as separate and distinct applications for review and for study of each project DEIR individually, the DEIRs cite and rely upon each other in a manner that makes it difficult to separate the DEIRs for review. Therefore, EDH APAC offers our comments on the Lime Rock Valley Specific Plan DEIR relative to the manner in which both DEIRs have been presented, with entangled infrastructure, and environmental impact mitigation - in many instances, our comments, questions, and concerns submitted for the Village of Marble Valley Specific Plan DEIR are duplicated in our review of the Lime Rock Valley Specific Plan DEIR.

The Lime Rock Development is described by the project applicants to be an infill development between established Cameron Park communities and the proposed Marble Valley development.

EDH APAC feels that it is important to note that an infill, as established by the El Dorado County Adopted General Play POLICY 2.4.1.5 as:

> A. Projects site must be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
> B. Project sites **may not be more than five acres in size** and must demonstrate substantially development has occurred on 2 or more sides of the site.
> C. Project site has no value as habitat for endangered, rare or threatened species.
> D. Approval of a project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
> E. The site can be adequately served by all required utilities and public services.

The main access is through the proposed Marble Valley development with both a gated and non-gated community. There is no commercial or retail development. Retail and commercial development is located to a limited scale in the Marble Valley development, to the North of HWY 50 along Bass Lake Road and east in Cameron Park. This is important to note due the fact that this will generate additional VMT & LOS (El Dorado County General Plan Compliance - Transportation Elements based on LOS) within the proposal and will be added on to any

traffic study produced by the Marble Valley proposal.

The report is prepared by same company, ICF, 980 9th st Sacramento CA. Attn: Sahara Ashkar that completed the Village Marble Valley project and is very similar in design.

Question:
Is it common to have the same company do the DEIR for projects adjacent to each other that are seeking approval at the same time?

General Plan Consistency

Transportation Element

As was observed in our public comments on the Village of Marble Valley Specific Plan DEIR, Vehicle Miles Traveled is the transportation metric now considered in CEQA, but Level of Service (LOS) metrics are incorporated into the El Dorado County General Plan. EDH APAC is concerned that traffic LOS impacts have not been studied or mitigated for traffic generated by the project for high school student residents of the project that will be attending Union Mine High School located at 6530 Koki Ln, El Dorado, CA 95623.

Students will potentially have to travel by US 50 through some of the following US50 intersections: Bass Lake Road, Cambridge Road, Cameron Park Drive, Ponderosa Road/South Shingle Rd, Shingle Springs Drive, Red Hawk Parkway, Green Stone Road, El Dorado Road, and Missouri Flat Road. The DEIR does not study these US50 segments for LOS impact for commutes to and from Union Mine High School.

Travel to and from Union Mine High School via the El Dorado County surface road network would include many road segments - Bass Lake Road, Country Club Drive, Cambridge Road, Flying C Road, Lariat Road, Strolling Hills Road, Cameron Park Drive, Coach Lane, Durock Road, South Shingle Road, Sunset Lane, Mother Lode Drive, and Pleasant Valley Road. The DEIR does not study these road segments for LOS impact for commutes to and from Union Mine High School.

Q: LOS impacts of the project extend beyond the El Dorado Hills and Cameron Park communities, and over 20 miles of El Dorado County Roadways and the California Highway system, and require study and mitigation. Will LOS studies be completed to account for possible General Plan Transportation Elements Impacts from trips to Union Mine High School?

Housing Element

Affordable Housing

Under Key Project Attribute

Priority Area Key Project Attribute Project Consistency Analysis (prior to mitigation)

At least 20% of units included are affordable to lower-income residents Not Consistent.

The LRVSP does not include any affordable units.

Results in no-net loss of existing affordable units Consistent. The LRVSP will develop underutilized open space and does not result in a net loss of existing affordable units.

The County meets its RHNA allocation as calculated by SACOG. El Dorado County however lacks in actual construction of affordable or more affordable housing units based on the economics of housing development in California. In this citation of the Affordable Housing requirement, the determination fails to note that there is no-net loss of existing affordable units, because there is no existing development in the LRVSP - there was never any affordable housing built. This is undeveloped land.

Q: Why is the developer exempt from providing lower income housing, or varying housing types in this 800 unit development ?

Community Region Designation

The Lime Rock Valley Specific Plan area is proposed to be added to the El Dorado Hills Community Region via General Plan amendment. Many area residents in El Dorado Hills, Cameron Park, and in the adjacent rural regions have questioned whether the better alignment for an expansion of a community region via General Plan Amendment for the Lime Rock Village Specific Plan might be the Cameron Park Community Region. If the Village of Marble Valley Specific Plan is denied approvals and entitlements (which also includes expansion of the El Dorado HIlls Community Region to include the Village of Marble Valley Specific Plan area), it would leave an approved Village Of Lime Rock Valley as part of the El Dorado Hills Community Region - un-contiguous the balance of the El Dorado Hills Community Region. An element of the General Plan addresses Community Identity - by expanding the Cameron Park Community Region to include the Lime Rock Valley Specific Plan area, it would keep Community Regions more compact, and respect community identity, aligning the Lime Rock Village Specific Plan area with adjacent Cameron Park Communities along Crazy Horse Ct. and Beasley Drive. As such, the Lime Rock Village Specific Plan area would be better served by the Cameron Park Community Services District (CP CSD) for Parks and Recreation services. EDH APAC is in receipt of a letter of concern from the CP CSD dated June 5, 2024 expressing many items of concern, including impacts on their existing park facilities (attached as EDH APAC Exhibit CPCSD-1).

Traffic - Transportation

The EDH APAC Standing Transportation Committee offered the following comments.

EDHAPAC Standing Committee on Transportation

Lime Rock Valley Transportation Observation

6/29/24

Summary Assessment:

The report describes surrounding infrastructure as it relates to this project but is vague or only touches on amenities in the project. It only addresses traffic generically and defaults to the basic acceptable guidelines from CEQA and OPR. The lack of specific detail implies that this is a precursor to a detailed report, and it is the expectation of the EDHAPAC Standing Committee on Transportation that the developer will complete the detailed traffic impact study.

The committee also has questions on emergency evacuation, bike and pedestrian paths, and US 50 interchange,

Specific Issues:

Q: Lack of comprehensive traffic study - Unless there is a more comprehensive traffic report coming, their numbers VMT, etc come from the county and might not be accurate with respect to this project. This Transportation and Circulation report lacks much-needed detail for this project is initially based on studies from 2013/14. The expectation is that the majority of grocery, retail/fast food/restaurants, fuel stations will be on the Bass Lake Road north side of the freeway and will increase VMT out of and into the project, as well as LOS impacts on Bass Lake Road (El Dorado County General Plan Transportation Element compatibility).

Q: Lack of clarity on emergency evacuation plan - Will there be egress paths on the southern end of the project? Currently it looks like the main exit is Marble Valley Parkway to Bass Lake Road. The FD appears to have multiple access points. Will the public be able to use the FD access roads to

evacuate? With over 3,000 homes and businesses in a tight valley, lack of egress is a recipe for disaster and loss of life.

Q: Lack of clarity on bike and pedestrian paths - The committee continues to focus on bike and pedestrian paths that are available to everyone. The report emphasizes and envisions various pedestrian and bicycle pathways used to get to neighboring areas, parks, and retail.

The proposed class1 bike lanes are restricted to public roads which prevent the general public from utilizing the lower portions of both sites.

Gravel roads are not suited for road bikes and are not open to the public in these plans. These trails end at Deer Creek bridge.

The vision of many is for a bike /pedestrian trail system that traversed the entire proposed development. The jewel in the crown would be a connected bike/pedestrian/equestrian pathway that utilizes the old train line. Examples of this type of path can be found in Placerville and in much of the nation where old train lines are converted to serve the community.

Who will be responsible for maintaining the bike and pathways within the project and connected outside the project?

Q: Main access-Bass Lake Exit off of US50 - This is controlled by Caltrans and not the County DOT. What is the plan and timeline to improve this on/off ramp and access to the Bass Lake retail area north of 50? This would also apply to Cambridge Rd which looks like it will require a connector road to be built from Marble Valley Parkway to Cambridge. Who coordinates and pays for that?

Interim Interchange improvements - The DEIR indicates that “interim” improvements will be made to the Bass Lake Road - US50 interchange when the project hits a trigger of 800 building permits. What is the methodology that prescribes 800 building permits as the appropriate trigger to offset impacts to the Bass Lake Road - US50 interchange? What improvements are proposed? The costs to study, design, and improve a California Highway interchange are significant, and costly, and take years to achieve and then construct.

The DEIR indicates that “interim” improvements will be made to the Cambridge Road - US50 interchange when the project hits a trigger of 750 building permits. What is the methodology that prescribes 750 building permits as the appropriate trigger to offset impacts to the Cambridge Road - US50 interchange? What improvements are proposed? As with the Bass Lake Road interchange, the costs to study, design, and improve a California Highway interchange are significant, and costly, and take years to achieve and then construct.

“Interim” interchange improvements suggest a temporary, or short term solution. What are the permanent and long range solutions to the Bass Lake Road and Cambridge Road interchanges that purport to fully mitigate the project’s impacts? What is the timeline for these improvements?

Resident comments regarding transportation submitted to EDH APAC

Q: Bass Lake/US 50 interchange: The Bass Lake interchange will have to be totally redesigned and reconstructed in order to accommodate any additional population increase on the Bass Lake corridor. Traffic already backs up on the E/B off ramp in the afternoons. Traffic backs up onto the freeway causing delays to the current residents and an unsafe condition ripe for a collision on the freeway. No additional traffic should be added to this interchange without a plan and funding in place to be completed before any new residents move to the area. Since the interchange improvements will have to be a partnership with the state and county, this is likely a 10-20 year project before completion.

Q: Bass Lake Road: This road is already inferior and unsafe in a few locations between US50 and Silver Springs Pkwy. This is a small two lane county road that was not designed for the current traffic volume. The additional residents of Marble Valley/Lime Rock will only exacerbate the unsafe condition. There are no turn lanes, suicide lanes or turn outs on most busy intersections. Intersections, such as Hollow Oak/Bass Lake should already be signalized and is currently an unsafe intersection. No additional population should be planned without improving the roadway in advance.

Q: The fire access roads planned in Marble Valley/Lime Rock are restricted use roadways that will not be open to the public on a normal basis. The roads will be gated because the surrounding, existing neighborhoods, do not want additional traffic caused by these developments to impact their neighborhoods. There is no plan in place to open the gates during an emergency. If there is a wildfire and Marble Valley/Lime Rock residents need to evacuate the area they will have to wait for the gates to be opened before they can evacuate. This is a horrible plan with a single point of failure to think that someone (Fire Dept, Sheriff?) will have to respond to the gate and open it. If there is a fast moving wildfire, similar to Paradise or Oakland Hills, it will be too late and the evacuation roads will be irrelevant because people will not be able to get out.

Additional resident comments regarding traffic

The Lime Rock Development is proposed as an infill community project with a single entrance from the Marble Valley Parkway within the Village of Marble Valley Specific Plan to Lime Rock Valley Road. A significant portion of the housing development and Village Park are outside a single entrance gate. The main residential roads are a circulation plan with an off shoot to emergency exits. pg 2-9

Noting that there is a Gated Entry on Figure 2-6 and 2-8. The assumption is made that the majority of lower density plots are within the gate and all of the medium density plots are outside the gates. pg 2-7 and figure 2-5

There are no commercial/retail lots within this community. They exist on the North side of Hwy 50, in Cameron Park and potentially a small amount in the VMVSP project. All VMT will be in and out of the gated and non-gated portion of LRV along a two lane road that connects to Marble Valley Parkway and on to Bass Lake intersection.

This suburban infill project will result in an increase of VMT to and from the Village of Marble Valley Specific Plan area but will also add significant VMT to Bass Lake/Hwy50 interchange in addition to the Village of Marble Valley Specific Plan and the Cambridge Road HWY50 interchange.

Question:

In an earlier application for LRVSP, there is a comprehensive traffic study prepared by Fehr & Peers in Aug. 2014. It starts on page 488 of the 1118 document and uses the LOS system in their analysis. They also cite DOT CIP 10yr plan for some fixes. But as you can see it is now 2024. This is 10yrs old and the question arises as to what are the current DOT CIP and CalTrans projects as it relates to Marble Valley/Lime Rock developments and all the surrounding developments bothresidential/retail/commercial that have occurred on Bass Lake Road and Cambridge Road?

The original traffic study within the 2014 application can be obtained at this address:
https://files.ceqanet.opr.ca.gov/173416-2/attachment/b-7Z4l-h3RjTRVOZd86M4GSsJrMPQeGAlkLxxz697yiuilAg2gCJKU7OtgyjrXn-iUQaZwGeEi0NWb8c0
The 2014 traffic study starts on page 488/1118.

Throughout this DEIR the developer has stated that this development will not be held back if VMVSP is not approved by the time LRVSP is approved.

Items addressed:

1. Infrastructure

2. EID Water

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 PG 2-11

The LRVSP would rely upon roadway and water infrastructure associated with the Marble Valley Master Plan, which was approved in 1998 (TM95-1298, PD95-0004, DA97-001) and has since expired. The expired Marble Valley Master Plan and tentative map included proposed Lime Rock Valley Road which would have provided access to the project area through the Marble Valley Master Plan area. As noted previously, there is a new proposed specific plan for the Marble Valley Master Plan area (the VMVSP), which includes the same infrastructure on which the LRVSP would rely. Therefore, Lime Rock Valley Road and water infrastructure would be approved regardless of whether the VMVSP is approved, and these improvements would be in place if the VMVSP or the Marble Valley Master Plan is constructed prior to LRVSP construction. 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. pg 4-5

3. Utilities

If VMVSP is not constructed prior to the construction of the LRVSP, these improvements would be the responsibility of the applicant. Pg 2-10

These are three of the examples in which the developer has said they will move forward and pay for these projects if VMVSP is not approved by the time they will break ground.

Question:

Has the developer of LRVSP filed a financial statement with the county, showing they have the resources to back up this statement that they will pay for infrastructure, water and utilities if VMVSP is not approved when LRSP is ready to proceed?

Further Traffic Concerns

Additional Traffic from both sides of Bass Lake/Hwy 50 interchange and Cambridge Road interchange will be significant with the addition of these developments 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. According to the Near-Term Traffic Analysis for Lime Rock Valley Specific Plan memorandum prepared for the project (Fehr & Peers 2018), pg 2-11

Question:

The F&P traffic report 2014 is very detailed and comprehensive for that time, 10yrs ago. An update traffic report should be required to show impact on Hwy 50 Bass Lake/Cambridge interchange and how it will affect the surrounding traffic considering the amount of residential and retail/commercial has been completed within the last 10yrs?

The Bass Lake Hwy 50 interchange and the increased traffic from these two developments on Bass Lake Road to retail areas on the North side of Hwy 50 will require additional traffic control measures. What is DOT CIP for Bass Lake Road and Cambridge for next 10yrs?

A traffic presentation by DOT for this area is needed to present to public problems/solutions and timelines for correction to these traffic concerns caused by these developments as they move forward.

Can this be added to EDHAPAC calendar for future meetings?

What will be the trigger point to start modifications of Bass Lake/Hwy 50 interchange. The Village of Marble Valley Specific Plan DEIR specifies a trigger of 800 building permits for the ‘interim’ interchange improvements to the Bass Lake Interchange, and 750 building permits for the ‘interim’

interchange improvements to the Cambridge Road Interchange - EDH APAC observes that these are rather arbitrary triggers, and recommends that defined metrics be established to determine the triggers for both interchange improvements. Further,interim interchange improvements will not suffice as a permanent mitigation for projects that feature a cumulative 4000 housing units, and hundreds of thousands of square feet of commercial development. The Bass Lake Road interchange in particular features a constrained two lane alignment under the US50 Bass Lake Road Overpass, and would need to be demolished and rebuilt to add additional travel lanes. Such an improvement would conceivably cost multiple tens of millions of dollars to construct. The Cambridge Road interchange features a two lane overpass that crosses US50. Additional lanes for Cambridge Road would again be a project that would exceed multiple tens of millions of dollars.

Has the applicant been in contact with DOT and Caltrans for a timeline and design study for the Hwy 50 intersections effected Bass Lake/Cambridge interchange?

Will modifications at the Hwy 50 interchange on day one of approval to manage construction traffic or will it be on as needed basis? How is both County DOT and CalTrans involved in that?

Environmental Comments

Biological Resources

The biological review is very thorough and comprehensive.

Of the potential 32 special status plants only 2 were observed and identified in the project area

1. Bisbee Peak Rush-Rose

2. Layne's Ragwort

These reports are very detailed on efforts to preserve these two special status species that grow in the development. For example 3.3-71 efforts shall be made to preserve Layne's Ragwort in the purposed sewage line.

A minimum avoidance buffer of 100 feet shall be incorporated into the revised sewer line location to ensure that no direct or indirect impacts on the Layne's ragwort plants shall occur during installation of the sewer line. Avoidance fencing, as described in Mitigation Measure BIO-1a, shall be erected around the Layne's ragwort population during construction and shall be removed when construction of the sewer line is complete. If total avoidance is not feasible, the project applicant shall implement compensation for the loss of Layne's ragwort as described in Mitigation Measure BIO-5d.

Language 3.3-71 talks about acreage compensation for loss of habitat-2acre for 1 acre lost.

Language 3.3-71 talks about collecting seeds for restoration of loss species.

Preventive measures will be required during construction to prevent loss of species and habitat
Mitigation Measure BIO-1a: Install construction barrier fencing around the construction area to protect sensitive biological resources to be avoided

Mitigation Measure BIO-1b: Conduct environmental awareness training for construction employees

Mitigation Measure BIO-1c: Conduct periodic site visits during construction

Mitigation Measure BIO-5a: Conduct floristic surveys in the project area for special-status plants during appropriate identification periods

Question:

Who in the county and the developer's staff administer these measures and insure that they take place?

Will the botanist be required to file a report with the county on progress and interventions which will be available to the public?

Similar to special status plants, there are special status species.

The extensive review determined that the following were in the development area:

1. Blainville's Horned Lizard

2. Northwestern Pond Turtle

3. Foothill yellow Legged Frog

4. Red Legged Frog

5. Palled Bat

6. Western Red Bat

7. Ringtails

The DEIR outlines extensive measures to preserve the species

Mitigation Measure BIO-1a: Install construction barriers around the construction area to protect sensitive biological resources to be avoided

Mitigation Measure BIO-1b: Conduct environmental awareness training for construction employees

Mitigation Measure BIO-1c: Conduct periodic site visits during construction

Mitigation Measure BIO-3a: Avoid and minimize disturbance of waters of the United States, including wetlands

Mitigation Measure BIO-7: Conduct pre-construction survey and implement California redlegged frog/Foothill yellow legged frog avoidance and minimization measures

The hired biologist has extensive responsibilities 3.3-73-74 in protection of these species and environments, up to and including shutting down an construction till mitigation measures are carried out. It requires them to write daily logs and report to county and developer.

This also applies to:

Nesting Birds/Raptors

Mitigation Measure BIO-11a: Conduct vegetation removal activities outside the breeding season for birds and raptors To the maximum extent feasible, the project applicant shall conduct all necessary vegetation (trees, shrubs, grasses) removal and pruning during the nonbreeding season for most birds and raptors (generally September 1–January 31). If vegetation removal cannot be accomplished in accordance with this timeframe, there is a high potential that birds or raptors shall nest in the project area and require no-disturbance buffers. If vegetation removal or pruning shall be conducted during the nesting season (February 1–August 31), preconstruction nesting bird surveys shall be required, and additional protective measures shall be implemented (see Mitigation Measure BIO-10b).

Mitigation Measure BIO-11b: Conduct preconstruction nesting surveys for special-status and non–special-status birds and implement protective measures during construction The project applicant shall retain a qualified wildlife biologist(s) to conduct preconstruction nesting bird surveys prior to the start of construction that would take place between February 1 and August 31.

Blainville's Horned Lizard

Approximately 163 acres of suitable chaparral habitat for horned lizard would be removed by construction of residential housing and associated roads in the western portion of the project area. The project would protect within open space approximately 122 acres of suitable horned lizard chaparral habitat.

Pond Turtles

When there is northwestern pond turtle habitat within 300 feet of construction activities, exclusion fencing will be installed along the perimeter of construction sites to protect northwestern pond turtle habitat and minimize the potential for turtles to enter the construction work area.

Bats

Mitigation Measure BIO-12: Identify suitable roosting sites for bats and implement avoidance and minimization measures

Ringtails.

Mitigation Measure BIO-14: Identify suitable shelter and denning habitat for ringtail and implement avoidance and protective measures

Question:

How will the county ensure and verify that the developer is following the requirements set forth in DEIR?

How is a single person or firm able to oversee such responsibilities for such an extended period of time? This project could take 20-25 yrs according to the developer.

This project has similar requirements to Marble Valley's DEIR. If both of these projects are approved and are developed together, will the contracted biological companies have enough staff to ensure requirements of the EIR are followed over the years of development?

How will this be monitored by the county for two similar adjacent projects?

Environment

This project will alter the following environments

1. Oak Woodland

2. Riparian Woodland

3. Jurisdictional Wetlands

These are the common mitigations sited:

Mitigation Measure BIO-1a: Install construction barriers around the construction area to protect sensitive biological resources to be avoided.

Mitigation Measure BIO-1b: Conduct environmental awareness training for construction employees

Mitigation Measure BIO-1c: Conduct periodic site visits during construction

<u>For Oak Woodland</u>

Mitigation Measure BIO-1d: Avoid and minimize potential disturbance of oak woodland habitat and compensate for loss of oak woodland and individual trees 31% of oaks will be removed 82 acres

Mitigation Measure BIO-1e: Maintain retained oaks in development areas

For Ripairan Woodland

Mitigation Measure BIO-2: Compensate for permanent loss of riparian woodland

For Jurisdictional Wetlands

Mitigation Measure BIO-3a: Avoid and minimize disturbance of waters of the United States, including wetlands

Mitigation Measure BIO-3b: Compensate for loss of jurisdictional wetlands

Question:

The common answer throughout the report is to remove unwanted habitat is "Compensate"

Who makes that determination, developer or county and how is it enforced and monitored?

Who makes the periodic inspections and do they report anywhere?

Who in the county is responsible for working out the compensation for loss of habitat?

Who will monitor the replacement trees and habitat after construction is done?

Is the developer required to inform the county of which acreage will be transferred from the development to other areas of the project to protect special species of plants?

This removal of interfering oaks would include the area around the Bass Lake interchange on the South side if the adjacent Village of Marble Valley Specific Plan project does not get approved.

It is recommended that at some future APAC meeting before grading starts that the bio/botantist monitor or firm gives a presentation on how they hope to comply with this complicated project and monitoring. Then take questions from the public at the end.

Additional comments, concerns, and questions provided by area residents.

1. Why do the project applicants believe that using data from 2012 is appropriate? The drought, global warming, excessive winter rains have greatly changed the environmental setting. The flora and fauna have changed in the last seven years. The out-of-date report is simply not enough to make any determination of what is present in the project area now.

Q: Biologists need to do thorough new fieldwork and studies, identify plants and animal life that are present or could be there, and identify project impacts based on current information,

not 2012 studies. Then you can develop meaningful mitigation measures based on what is present—not what used to be there 11 years ago.

2. Several Biological Reports date to 2012 Perhaps citizens should also point out some of the problems with your reports to the Corps so they are aware of this attempt at "sneaking" this through process in their permit review without doing current surveys?

Q: Will the Corps of Engineers accept old or expired reports?

Archeological/Cultural Resources

1. As with the biological studies, the DEIR uses expired reports based on 2012 studies. Are any of the sites still there? What has been damaged in the interim? A 2023 or 2024 report reporting on the condition of the resources is required. Also, the way sites are treated now is changing—districts create great difficulties in determining significance and in creating mitigation measures.

Q: A 2023 or 2024 report reporting on the condition of the resources is required.

2. Native American consultation dates to 2013 - 11 years ago. Much has changed since that time. There are many more groups on the Native American Heritage Commission list for El Dorado County. There is also a group, not federally recognized yet, but reported to have descendants of the nearby tribelet of *Wapumne* near Latrobe. This group believes in the importance of bedrock mortar sites. Their opinion should also matter, as well as the current views by other groups, and new mitigation measures developed.

Q: Native American Heritage Commission list for El Dorado County should be consulted for updated 2024 consultations and new mitigation measures developed.

3. The analysis requires using a truly impartial archeological firm to do some current work with an up-to-date survey and mitigation measures for the current project design. The team used in the past will simply defend their old studies. They should be advocating for an update, knowing their report is expired.The Corps of Engineers is unlikely to accept this expired study, and should also request a newer report.

Q: Impartial archeological firm should be engaged to do some current work with an up-to-date survey and mitigation measures for the current project design. The Corps of Engineers is unlikely to accept this expired study, and should also request a newer report.

Public / Community Benefits

1. What value does this project have for existing residents of El Dorado Hills and Cameron Park? How will this enhance the lives of current residents? Does it mean more than the traffic impacts it will cause at an already backed up intersection of the Bass Lake Road exit and Highway 50.
2. Why is an archeologist doing the DEIR documents? No generalists available? Or perhaps someone else might call out the problems with using out of date environmental technical studies that environmental authors seem to think are adequate?
3. There are concerns about the potential health effects of breathing lime, and problems with circulation of lime through buildings by an HVAC system.

Water Supply

EDH APAC member Alastair Dunn, with years of experience in land development, acquisition, and entitlements, not just in El Dorado Hills and El Dorado County, but nationally, has expressed major concern regarding water supply in El Dorado Hills, as well as with the calculation methodology and value of older reporting data. Mr. Dunn has provided the following detailed analysis to EDH APAC for inclusion in our response to the DEIR for the Village of Marble Valley Specific Plan - EDH APAC includes here for reference for the Lime Rock Valley Specific Plan as well.

EDH APAC EXECUTIVE SYNOPSIS: WATER SUPPLY

Water Supply - General Plan Consistency

The data suggests that <u>on a local - EDH -level the supply and demand situation appears in a deficit of supply, not only in the short run, but also in the medium and long term.</u>

Summary:

Given the positive assertion that: “there is sufficient water to cover the needs of all EDH projects” in general and Marble Valley and Lime Rock Valley Specific Plans, in particular; is false.
The main issue of imbalance in the medium and long term is the certainty of water rights secured and capital improvements achieved, see Exhibit 8 & 9. It is beyond my ability and the scope of this work to make any qualifying remark other than to say; I am uncomfortable with the caveats made in memoranda qualifying EID’s water availability. To quote one such caveat*: “The water rights applications and environmental analysis are still pending”. And “the District cannot predict whether or when El Dorado Water Reliability Project may be approved”. Indeed, the Tully and Young Memo of May 30, 2014, is rife with caveats that are now eleven ten years old.

Admittedly EID has achieved much since 2013, however, to continue to write long memos and outdated references in the Marble Valley DEIR underscoring the water rights secured and capital improvements

made, it is imperative that a fresh review of these critical issues are factually reviewed, and if possible, qualified by a concrete probability (0 to 100) to give a measure of credibility as to water supply. (*MSR & SOI Update (final) Public -Service & Infrastructure, page 7-16 in reference to 2010 EDWPA's environmental report).

CONCLUSION

The fact that 17000 units are planned in the EDH area should give anyone reason to question the availability of water for such a fantastic, planned demand.

Throughout the DEIRs from 2013 to 2024 there are statements concluding that there "is" sufficient water to attend Marble Valley's (and Lime Rock's) potable water needs. I suggest that this is not true for the EDH area.

Regarding Appendix B - Consistency with the El Dorado County General Plan in objective 5.2.1.2 and 5.2.1.4: The attached memorandum forwarded by this EDH APAC Member suggests that:
Q: <u>The Project Consistency statement made that there "is" sufficiency of water is not true.</u>

Q: The County must insist that the proponent, Marble Valley LLC have a full and proper update of the SB 610 Water Supply Assessment of August 2013 by Tully & Young updated prior to proceeding with any hearing by the Planning Commission for such a project.

EID & EDH: Water Supply & Demand Study by Alastair Dunn

The following documents were reviewed:

➢ DEIR, Water Supply Assessment, Tully & Young, October (2021)

➢ Village of Marble Valley Specific Plan, DEIR, May, 2024: Other Considerations, Impact Analysis.

➢ BAE Memorandum, November 2023

➢ EID's Urban Water Master Plan 2020, Chapters: 2 Water Service and System Description, 3 Water Supply, 4 Water Use, 5 Water System Reliability.

➢ Tully & Young Memorandum, May 2014 (19-1670 G 216 of 360)

➢ El Dorado Water Supply Assessment for Central El Dorado Specific Plan, August 2013.

The Marble Valley DEIR document constantly refers to past EID studies now between 11 and 5 years old, which to my mind brings into question the validity of the statements made in the DEIR itself.

On the 11th of June last in the Planning Department's presentation in Cameron Park of Marble Valley and Lime Rock Valley, the proponents' leaflets on Water Supply said: "Based on these estimates from the EID's Urban Water Management Plan (UWMP-2020) there would be sufficient water supply for the proposed project, as well as other planned developments". It is that assertion I wish to qualify in this document.

Methodology

I attempted to reconstruct the many tables presented by EID throughout the documents into Excel tables to clearly show both historical (2015-2020) and projected (2020-2040) data so that one may quantify the basis of the assertions made as to adequacy of water availability for future projects in EDH.

All data was taken from the referenced documents above. However, it was incredibly difficult to link the many tables referenced into a logical array. Accordingly, I had to make some assumptions to present an array of data from 2015 to 2040 in a logical manner.

Particular attention was given to EDH's "pipeline*" of active and future projects undergoing the CEQA process in the County Planning website (projects in your area) to construct a nexus between residential units and acre feet of water to be supplied. See Exhibit A. (*Land developers generally refer to projects in the pipeline, to identify for planning purposes the number of residential units and commercial development for a given area).

All EID documents reviewed from 2013 to 2024 were internally consistent and factually referenced. They are sound documents. The problem arose when attempting to combine the data in each into summary tables on both supply and demand of water.

Table 6: Water Supply for EID Area

EID AREA - SUPPLY	In Use	Ac. Feet	Long term	Very Long	TOTAL
Sub Total Existing Contracts	23,000	27,190	17,000	-	67,190
Sub Total Planned	-	-	7,500	30,000	37,500
Recycled water	2,800	-	-	-	2,800
TOTAL Acre Feet	25,800	27,190	24,500	30,000	107,490
CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490	
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871	

Note that the table is consistent with the totals given by EID in their public service infrastructure: EID MSR & SOI Update pages 7-16.

EDH Water Supply

Unfortunately, EID does not give – or I could not find– EDH's supply broken out from the above table.

I developed a ratio from EID's 2019 supply breakdown where I determined that EDH uses 28.7% of EID total supply. The table below summarizes my assumptions:

➢ EDH takes 42.1% of the EID total supply, Table 11.

	Tota EID		EDH	Other + P'ville	Est+West+ otr
	Acre Feet	100.0%	42.1%	17.4%	40.5%
Sub Total Residential area	14,684	55.9%	8,926	-	5,758
Sub Total ommer +Ldsc+Tf	3,225	12.3%	2,015	-	1,210
Sub Total Ag	3,803	14.5%	137	-	3,666
Sub Total P'ville + other	4,571	17.4%	-	4,571	-
Total Usage 2019	26,283	100.0%	11,078	4,571	10,634

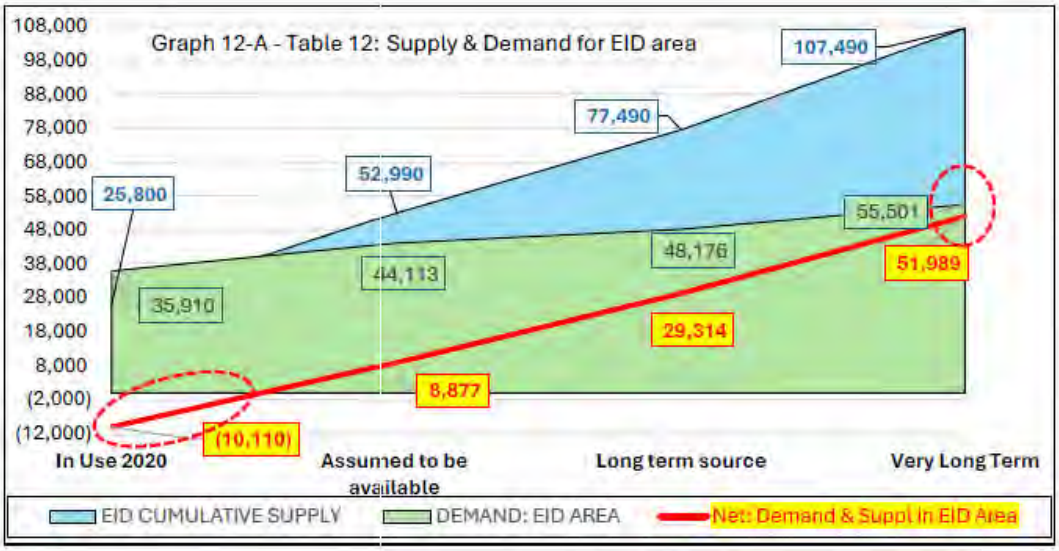
➢ Where (residential takes 55.9% of total plus 12.3% for commercial uses etc. to give EDH a total of 68.2%; that when multiplied by 42.1%-acre feet of water share, gives a factor of 28.7% representing EDH's share of total EID water supply.

I detail this assumption because it is critical in determining the supply and demand estimate for the EDH area.

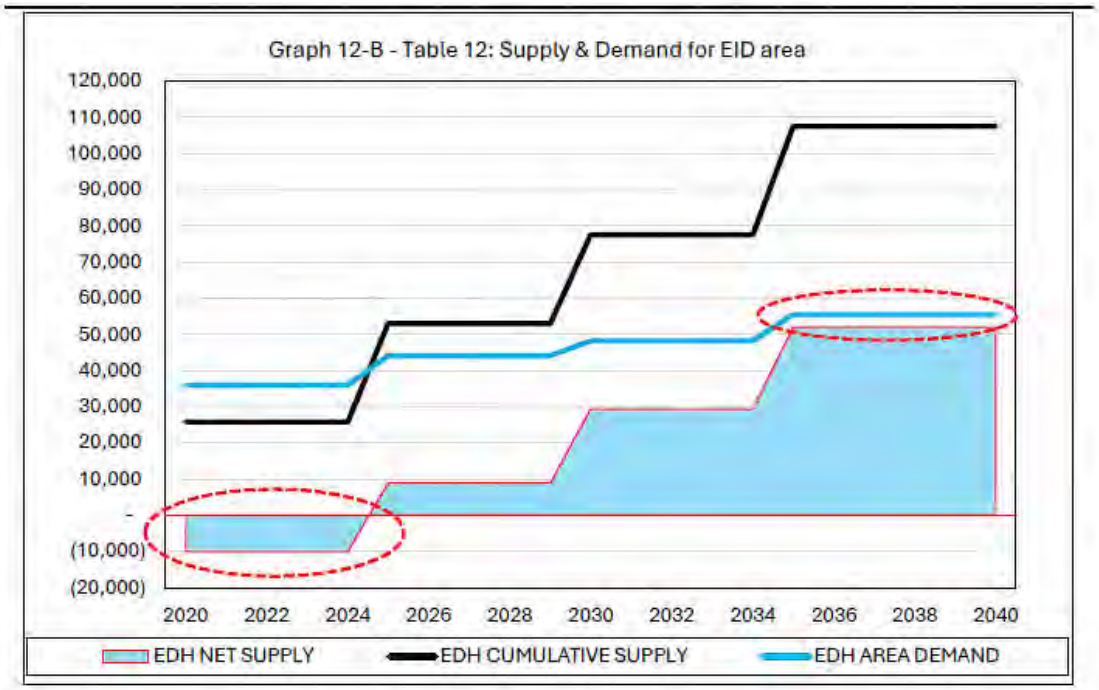
Neither Tully & Young nor the Proponent (Marble Valley LLC) make this distinction. It is only with this desegregation can anyone make the necessary nexus with EID's acre feet projections and the EDH pipeline. The positive supply availability statements made rely exclusively on EID's total supply to reach their availability supply statements regarding EDH. I maintain that this is erroneous because it is not that EID Area has a problem of water supply, but EDH as an area within EID that does.

Supply & demand for the EID area (Table 12).

SUPPLY & DEMAND for EID area (in Ac.Ft)	In Use 2020	Assumed to be available	Long term source	Very Long Term
EID CUMULATIVE SUPPLY	25,800	52,990	77,490	107,490
DEMAND: EID AREA	35,910	44,113	48,176	55,501
Net: Demand & Suppl in EID Area	**(10,110)**	**8,877**	**29,314**	**51,989**



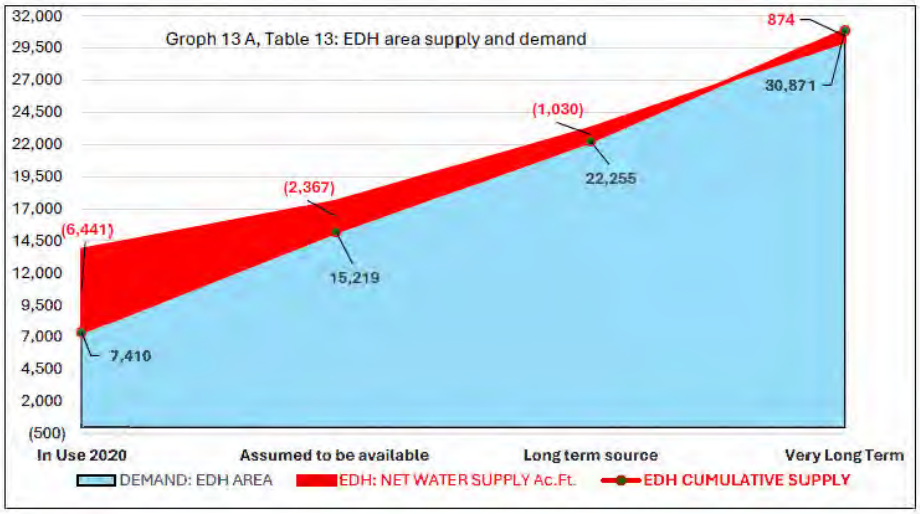
Maybe viewing the data in a different graph (12-B) shall illustrate EID's overall supply and demand situation better showing a small deficit in the 2020/25 period largely because of the net water demand of approved projects in the area. The data also shows that in the very long term the S&D balance is "thin".

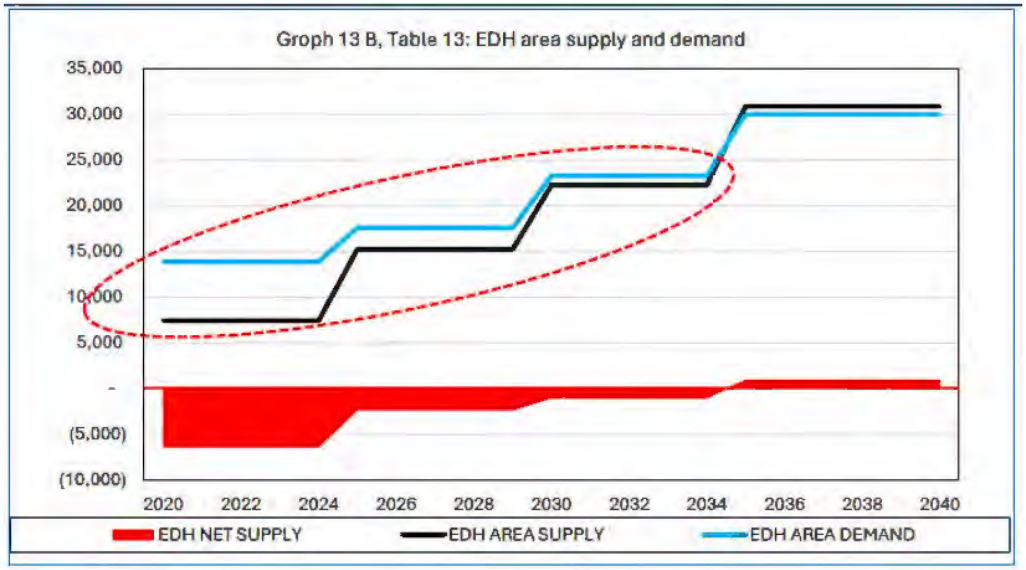


Conclusion: The EID area is not particularly threatened by a deficit of supply except possibly in the short run. However, this is largely dependent on the current net demand situation, that given the coarseness of the demand data derived requires better market data.

Supply & demand for the EDH area (Table 13)

EDH AREA: SUPPLY & DEMAND (in	In Use 2020	Assumed to	Long term	Very Long
EDH CUMULATIVE SUPPLY	7,410	15,219	22,255	30,871
DEMAND: EDH AREA	13,851	17,586	23,285	29,997
EDH: NET WATER SUPPLY Ac.Ft.	**(6,441)**	**(2,367)**	**(1,030)**	**874**





The data suggests that on a local - EDH -level the supply and demand situation appear in a deficit of supply, not only in the short run, but also in the medium and long term.

Sensitivity Analysis

This study would be incomplete unless a sensitivity analysis were conducted on the two of the most sensitive variables to assess the severity of supply and demand imbalance:

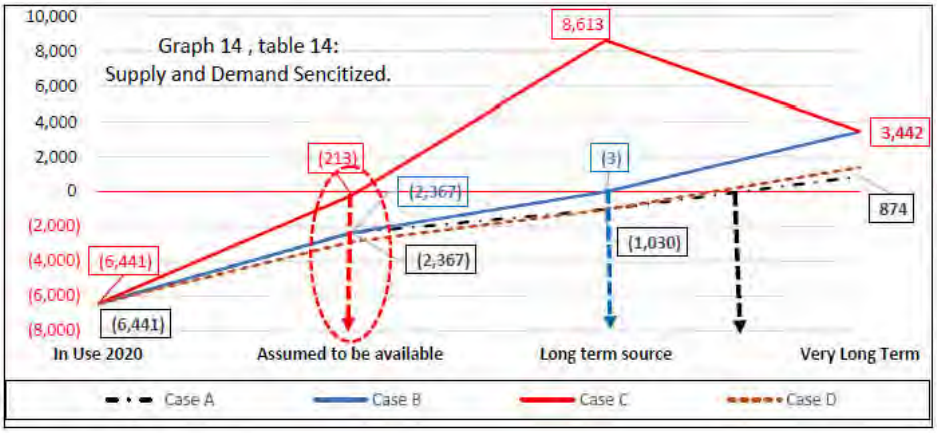
➢ For water supply, which in this case is dependent on EID's capital investment program to secure the water right in Exhibits 8 & 9; and

➢ the predicted absorption of residential units in the EDH area – particularly in the short run.

Table 14: Variables sensitized (in red).

EDH Area	In Use 2020	Assumed to be available	Long term source	Very Long Term	Base Case	Average Absorption 2025-30	Average Absorption 2030-35	Average Absorption 2035-40	Average Absorption 2035-40	AcFt brought forward "assumed available)2025-30
Case A	(6,441)	(2,367)	(1,030)	874		25%	35%	40%	0%	
Case B	(6,441)	(2,367)	(3)	3,442		25%	25%	25%	25%	
Case C	(6,441)	(213)	8,613	3,442		25%	25%	25%	25%	37500 ac.ft. planned.
Case D	(6,441)	(2,881)	(1,030)	1,388		30%	30%	35%	5%	37500 ac.ft. planned.

I modified the absorption to benefit the overall availability of water and in one case brought forward Permit 2112 (Warren Act)17000 ac. Ft.+ CVP Contract- Fazio 7500 ac. Ft. Below the results graphed for the EDH area:



As the arrows show, no matter what, EDH has an imbalance of supply of water, particularly in the short run.

Mr. Dunn's full documentation is attached as:

ExhibitW-FULL	EDH WATER - Supply + Demand Analysis -W-FULL.pdf
ExhibitW1	EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf
ExhibitW2	EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf
ExhibitW3	EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf
ExhibitW4	EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf
ExhibitW5	EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf
ExhibitW6	EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf
ExhibitW7	EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf
ExhibitW8	EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf
Exhibit A-Dunn1	EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf

Air Quality

Submitted to EDH APAC by a concerned Cameron Park resident. While the initial concerns were directed towards the Village of Marble Valley Specific Plan, the questions and concerns raised here remain applicable to the Lime Rock Village Specific Plan.

Village of Marble Valley Specific Plan (VMVSP) DEIR Air Quality Comments

General Comments:

Diesel Exhaust Emissions Quantification Errors

- **Omission of SO_2 Emissions and Omission of Local NO_2 Impacts:** (DEIR Page 3.2-9): "[Footote 3]: As discussed above, there are also ambient air quality standards for SO_2… However, these pollutants are typically associated with industrial sources, which are not included as part of the project. Accordingly, they are not evaluated further. [Footnote 4]: Most emission of NO_x are in the form of nitric oxide… Conversion to NO_2 occurs in the atmosphere as pollutants disperse downwind. Accordingly, NO_2 is not considered a local pollutant of concern for the proposed project and is not evaluated further"

Discussion:

SO2: Emissions of SO_2 occur commonly in diesel-fired equipment, including mobile on-road and off-road sources, due to the presence of sulfur in diesel. Even though formulations of diesel are required to be "Ultra Low Sulfur Diesel" (ULSD), there are still SO_2 emissions, and this is a material omission/error in quantification.

NO_x: While it is true that emissions of NO_x from mobile sources tend to be predominantly in the form of NO, combustion of diesel does lead to a non-trivial quantity of NO_2, with ratios of NO_2/NO varying depending on engine load, cold-start, and many other factors. For heavy-duty diesel engines, the percentage of No2 in NOx can range anywhere from 10 – 30% during normal operation, while in diesel-powered passenger vehicles it can be up to 60%[1]. Primary oxidation of N_2 to NO occurs around 1000K, while secondary oxidation to NO_2 occurs around 1500K, hence the contribution from cold starts and low loads in diesel-powered construction equipment. A conservative approach to NO_x and NO_2 should be taken since NO_x is an ozone precursor, and NO_2 does present local health impacts.

- **Potential underquantification of emissions from heavy-duty diesel truck emissions (and associated health impacts)**

The study (Appendix C) relies heavily on CalEEMod runs, a model that is used commonly for construction emissions modeling in California. While such a long construction period with a wide variety of potential scenarios can create a number of issues when estimating associated emissions, it is not clear that the Applicant quantified heavy-duty diesel truck emissions to the nearest highway (or beyond) which would provide a more representative estimate of DPM, NO_x, SO_2, and other

associated emissions (see next point) associated with the impacts from new heavy-duty diesel truck trips associated with construction and operation of the proposed project. This may underestimate the project and cumulative health impacts associated with diesel emissions to the public from the project (including to proposed sensitive receptors, e.g., the middle school, slated for construction during construction year 12).

- **Absence of speciation/calculation of TAC/HAP from diesel combustion emissions (and associated health impacts)**

While DPM is the primary toxic air contaminant (TAC) of concern associated with diesel combustion, organic and particulate fractions of emissions from diesel combustion can be further speciated into TAC/hazardous air pollutants (HAP, also considered to be TAC under California Air Resources Board (ARB) law). Example compounds include the following: acrolein, benzene, 1,3-butadiene, formaldehyde, ethyl benzene, hexane, propionaldehyde, styrene, xylene, chrysene, and naphthalene. Such specifications are available via EPA MOVES guidance on Mobile Source Air Toxics (MSAT)[1]. In the absence of the quantification of these compounds, potential health impacts to the public (including sensitive receptors) cannot be ascertained and the project's overall health impact cannot be determined.

General Mobile Source Emissions Quantification Errors or Omissions

- **Absence of information around impacts from additional annual average daily traffic (AADT) from proposed project**

Appendix C (Air Quality) provides an additional 37,927 AADT associated with the build out of the VMVSP relative to a baseline AADT on Highway 50 of 61,000 – 62,000 AADT. The increase of ~61% AADT is quite substantial and warrants an evaluation of associated emissions and health impacts. It is unclear whether emissions (both criteria pollutant and TAC/HAP) from the additional AADT have been considered in the analysis. The omission of this analysis does not enable an assessment of the potential health impacts to the community within the VMVSP nor to the surrounding community from increases in mobile source criteria pollutant and TAC/HAP emissions. Such impacts may be acute (short-term); chronic (long-term but non-cancerous); or additional cancer cases. Additionally, since the Sacramento Federal Nonattainment Area (SFNA, which includes the western portion of El Dorado County) is in severe non-attainment for ozone, the impacts from the proposed VMVSP on achieving attainment with the National Ambient Air Quality Standard (NAAQ) for ozone by August 3, 2033 (and the impact on current air quality) cannot be assessed (see discussion on the lack of EPA air monitors in El Dorado County below).

Cumulative Impacts Analysis Does Not Provide Adequate Information to Determine Impact of Project

While the California Building Industry Association v. Bay Area Air Quality Management District (2015) decision did not affirm that CEQA required an "analysis of how existing environmental conditions will impact future residents or users (receptors) of a proposed project", lead agencies may still need to

determine whether environmental impacts from a project will exacerbate existing environmental conditions[1].

With numerous development projects underway in the Folsom area, and several proposed adjacent to the project area, along with construction and operational impacts to sensitive receptors possible during the protracted construction period (2025 – 2045), it is likely that the project will present even more severe incremental impacts to the environment and health of the community. BAAQMD's recent 2022 CEQA guideline update ("nonbinding recommendations intended to assist lead agencies with navigating the CEQA process"[2]) address this in Section 5: Project-Level Air Quality Impacts, by providing recommended project and cumulative impacts thresholds. While El Dorado County Air Pollution Control District (EDCAPCD) has a project-level threshold of 10 in one million cancer cases, such an evaluation (with all TACs considered) would provide the public with transparency into cumulative health impacts from the project and nearby development projects.

Additionally, commuting emissions impacts to the SFNA weren't quantified as part of the DEIR. Available data suggest a mean commute time of 29.3 minutes each way for residents of El Dorado County. These emissions are likely to be dispersed throughout the SFNA, increasing atmospheric ozone concentrations beyond those already designated as "severe non-attainment". While emissions from motor vehicles are anticipated to decline over time as lower emissions options become available, impacts to public health from the additional 37,927 AADT associated with the proposed project are not negligible. One such example of cumulative impacts of ozone in regions designated as non-attainment have occurred in recent weeks within the South Coast Air Quality Management District and other Southern California air districts where atmospheric ozone concentrations were such that the public was advised by regional air agencies to avoid fueling for several days at a time during daytime hours to help minimize impacts to regional ozone concentrations[3].

Lack of Quantitative Assessment of Health Impacts from Proposed Project

While the DEIR and associated Air Quality Appendix presents emissions of DPM (and a qualitative discussion of health impacts) associated with the proposed project, there are a number of omissions:

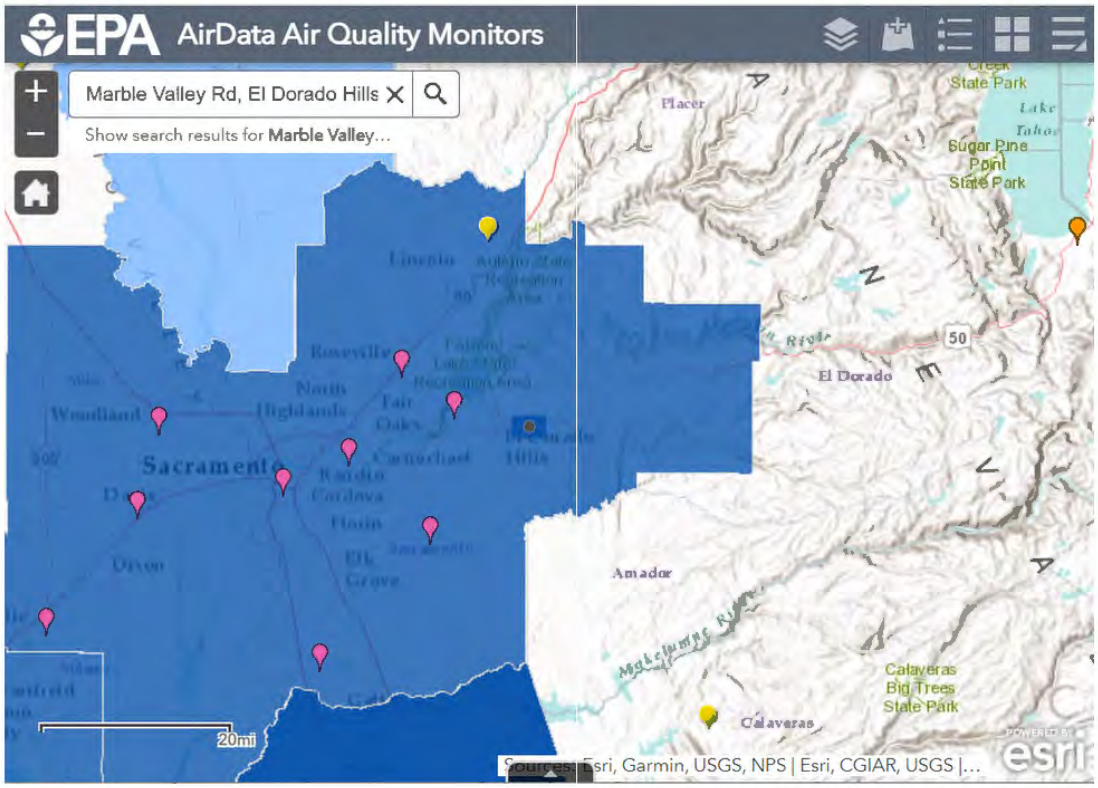
1. A quantitative assessment of risk from DPM to the residents and public residing in the VMVSP during the 20-year construction period is not included in the analysis. A CO Hot-Spots analysis was conducted, but there is not a quantitative analysis of the impacts of DPM emissions on the residents of the community (including impacts to students at the proposed middle school, which will be operational during concurrent construction of the community, exposing them to emissions of DPM). Such analyses should be performed using AERMOD and site-specific meteorological information since spatial and temporal elements are included to improve the accuracy of such modeling outputs.

2. As noted above, it is not clear whether TAC/HAP emissions from on-road mobile sources from the VMVSP were quantified. When such emissions are quantified, a quantitative health risk assessment should be performed to provide the public with an accurate representation of the

potential acute, non-cancer chronic, and cancer-related health impacts associated with the proposed project.

3. As noted within the DEIR and Appendix C accompanying the DEIR, there are no EPA air quality monitoring stations near the study area. The nearest monitor with an adequate amount of ozone baseline data is located in Sacramento County (50 Natoma St, Folsom). It is recommended (as a potential mitigation measure) that the project applicant fund the installation of ozone and particulate monitoring stations near the proposed project and prohibit construction on days where either the NAAQS or Air Quality Index (AQI) exceed certain values to be protective of public health. A map representing the nearest air quality monitoring stations (pink are ozone monitoring stations) and the boundary of the severe non-attainment area for ozone are presented as Figure 1 below).

Figure 1. EPA AirData Air Quality Monitors for the Study Region



Inadequacy of Proposed Mitigation Measures

While the implementation of mitigation measures to increase park lands, preserve open space, and provide bike trails as an alternative means of transport are desirable and broadly supported, they do not reduce the outdoor inhalation burden of additional criteria pollutants and TAC/HAP from the proposed project. In fact, since the mean commute time in El Dorado County is ~29 minutes, the addition of bike paths cannot be expected to decrease the number of motor vehicles on the road. Residents biking and enjoying park facilities will be exposed to the additional criteria pollutant and TAC/HAP emissions from the proposed project without abatement while outdoors since the installation of MERV 6 and MERV 8 filtration in residential buildings will only protect residents while they are indoors.

[Footnotes]

[1] https://www.respire-asso.org/wp-content/uploads/2015/09/2015_09_Five_facts_about_diesel_FINAL.pdf

[2]
Furthermore, the EPA has identified 20 Key Mobile Source Air Toxics associated with either evaporative or exhaust emissions from mobile source combustion.
https://www.epa.gov/sites/default/files/2019-08/documents/1050am_cook_508_0.pdf

[3]
Practical Recommendations for Implementing California Supreme Court's Latest CEQA Decision - Court: CEQA Does Not Generally Require an Analysis of Environment's Impacts on a Project | Casetext

[4]
https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en

[5]
California Drivers Told To Avoid Gas Stations in Multiple Cities (msn.com) (June 2024), Drivers Told To Avoid Gas Stations Across Multiple States - Newsweek (June 2024)

Conclusion

EDH APAC appreciates the engagement of the project applicants in our community. The applicants spent a significant amount of time at our June 2024 EDH APAC public meeting, providing a presentation of the project elements, discussing aspects of the projects, and answering questions from EDH APAC meeting attendees.

We look forward to providing additional input and feedback on the project, and encourage the applicant to continue active engagement with the community to clarify issues, concerns, and mitigations as the approval and entitlements process continues.

EDH APAC relies on the input and participation of residents.

EDH APAC appreciates the opportunity to review and provide resident feedback on development projects in and around the El Dorado Hills Community.

John Davey Chair
Tim White Vice Chair
John Raslear Vice Chair
Brooke Washburn Vice Chair

El Dorado Hills Area Planning Advisory Committee
"Non-Partisan Volunteers Planning Our Future Since 1981"

RE: Lime Rock Valley Specific Plan SP12-0001 public workshop August 8, 2024

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

John Raslear <jjrazzpub@sbcglobal.net>
Wed 8/7/2024 2:49 PM

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Greetings, Kudos to the members of APAC and John Davey for the research that has been done for this specific plan. We expect that this information be made available at this work shop.
I repeat again my comment at the El Dorado Hills Community Council on Monday that this workshop should be held in EDH for the residents who will be most affected by these developments.

John Raslear

John Raslear
Vice Chair EDH Area Planning Advisory Committee
jjrazzpub@sbcglobal.net

From: El Dorado Hills Area Planning Advisory Committee [mailto:info@edhapac.org]
Sent: Tuesday, August 6, 2024 8:17 PM
To: planning@edcgov.us; Aurora M. Osbual; Andy Nevis; Daniel Harkin; Lexi Boeger; brandon.reinhardt@edcgov.us; bob.williams@edcgov.us
Cc: tjwhitejd@gmail.com; washburn_bew@yahoo.com; jjrazzpub@sbcglobal.net; jdavey@daveygroup.com; g.steed@att.net; bjamaca@gmail.com
Subject: Lime Rock Valley Specific Plan SP12-0001 public workshop August 8, 2024

Hello,

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following comments, questions, and concerns in regard to the Public Workshop for the proposed Lime Rock Valley Specific Plan SP12-0001 Draft EIR in advance of your scheduled August 8, 2024 public meeting

The comments and questions have been collected from EDH APAC volunteer members, El Dorado Hills and Cameron Park residents, and residents of El Dorado County Rural Regions adjacent to the proposed Plan Area.

Included to begin our comments document is the following:

> **Initial Concerns**
>
> The Lime Rock Valley Specific Plan has been presented to the community as almost a co-project application along with the Village of Marble Valley Specific Plan. Many of the infrastructure elements, along with environmental mitigation proposed in the DEIRs for both projects' impacts seem to leverage the other project, or facilitate the elements of the other project. Recent community discussion, open house presentations, and review meetings in El Dorado Hills and in Cameron Park, have presented each project as part of a single cumulative review.
>
> In the Lime Rock Valley DEIR it is suggested that where the project relies upon infrastructure, or environmental impact mitigation either provided by the Village of Marble Valley Specific Plan, or entangled between the projects, that in the event of the failure or delay of the Village of Marble Valley Specific Plan to gain adoption of the FEIR, along with project entitlements and approvals, that the Lime Rock Valley Specific Plan project will provide the infrastructure and environmental impact mitigation itself, in full. On its face, this concerns our volunteers and the community as to how the significantly smaller 800 unit Lime Rock Valley Specific Plan project can provide those project elements in regards to funding the infrastructure/environmental impact mitigation, and how that would impact the infrastructure/environmental impact mitigation timing, likely with considerable delays, as the Lime Rock Valley Specific Plan indicates a potential build out over 20-25 years, and the much larger 3200 unit Village of Marble Valley Specific Plan DEIR suggests a build out over 19 years.
>
> Even though it is the preference of EDH APAC that the projects be treated as separate and distinct applications for review and for study of each project DEIR individually, the DEIRs cite and rely upon each other in a manner that makes it difficult to separate the DEIRs for review. Therefore, EDH APAC offers our comments on the Lime Rock Valley Specific Plan DEIR relative to the manner in which both DEIRs have been presented, with entangled infrastructure, and environmental impact mitigation - in many instances, our comments, questions, and concerns submitted for the Village of Marble Valley Specific Plan DEIR are duplicated in our review of the Lime Rock Valley Specific Plan DEIR.

We also provided the following comments in our email message for the Village of Marble Valley Specific Plan Public Workshop - we repeat it here for the point of clarity:

> EDH APAC members would also like to share our concern with two large specific plan projects seemingly being processed as one project. Or belief is that these projects should be processed separately, with at least 30-60 days space between hearings. As the larger project, the Village of Marble Valley Specific Plan should be processed first, as many of the infrastructure and mitigations proposed in the VMVSP project are included as infrastructure elements and mitigation actions for the Lime Rock Valley Specific Plan. Two Specific Plan applications, two projects, two hearings.

ATTACHMENTS

ExhibitW-FULL	EDH WATER - Supply + Demand Analysis -W-FULL.pdf
ExhibitW1	EDH APAC ExhibitW1 EID Water Demand Master Pop Projections Sheet1.pdf

ExhibitW2	EDH APAC ExhibitW1 EID Water Demand Master EID Growth Projections Sheet2.pdf
ExhibitW3	EDH APAC ExhibitW1 EID Water Demand Master EID Demand Est Sheet3.pdf
ExhibitW4	EDH APAC ExhibitW1 EID Water Demand Master Demand Fut Proj Unit Sheet4.pdf
ExhibitW5	EDH APAC ExhibitW1 EID Water Demand Master Supply and Demand Sheet 5.pdf
ExhibitW6	EDH APAC ExhibitW1 EID Water Demand Master Customer Use 2019 AFt Sheet6.pdf
ExhibitW7	EDH APAC ExhibitW1 EID Water Demand Master Supply in Sc Ft 2019 Sheet7.pdf
ExhibitW8	EDH APAC ExhibitW1 EID Water Demand Master Supply EID Reliability Sources Sheet8.pdf
Exhibit A-Dunn1	EDH Projects in EDH - CamPk plan areas - may 2024-A-Dunn1.pdf
EDH APAC Exhibit CPCSD-1 June 5-2024 CPCSD	2 EDH APAC Exhibit CPCSD-1 June 5-2024 CPCSD Response concerning Development Agreements for Marble Valley and Lime Rock.pdf
EDH APAC LRVSP DEIR COMMENTS	1 EDH APAC Lime Rock Valley Specific Plan DEIR Public Comments

Respectfully,
John Davey
Chair
El Dorado Hills Area Planning Advisory Committee

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