

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 31 of 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, and use and	Suitability Rating	Residential	Commercial	Industrial Park
<b>Moderate</b>	<b>Satisfactory</b>	<b>6–12%</b>	<b>6–12%</b>	<b>2–6%</b>
<b>Severe</b>	<b>Marginal</b>	<b>12–18%</b>	<b>12–18%</b>	<b>6–12%</b>
<b>Very Severe</b>	<b>Unsatisfactory</b>	<b>&gt;18%</b>	<b>&gt;18 %</b>	<b>&gt;12 %</b>

<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**

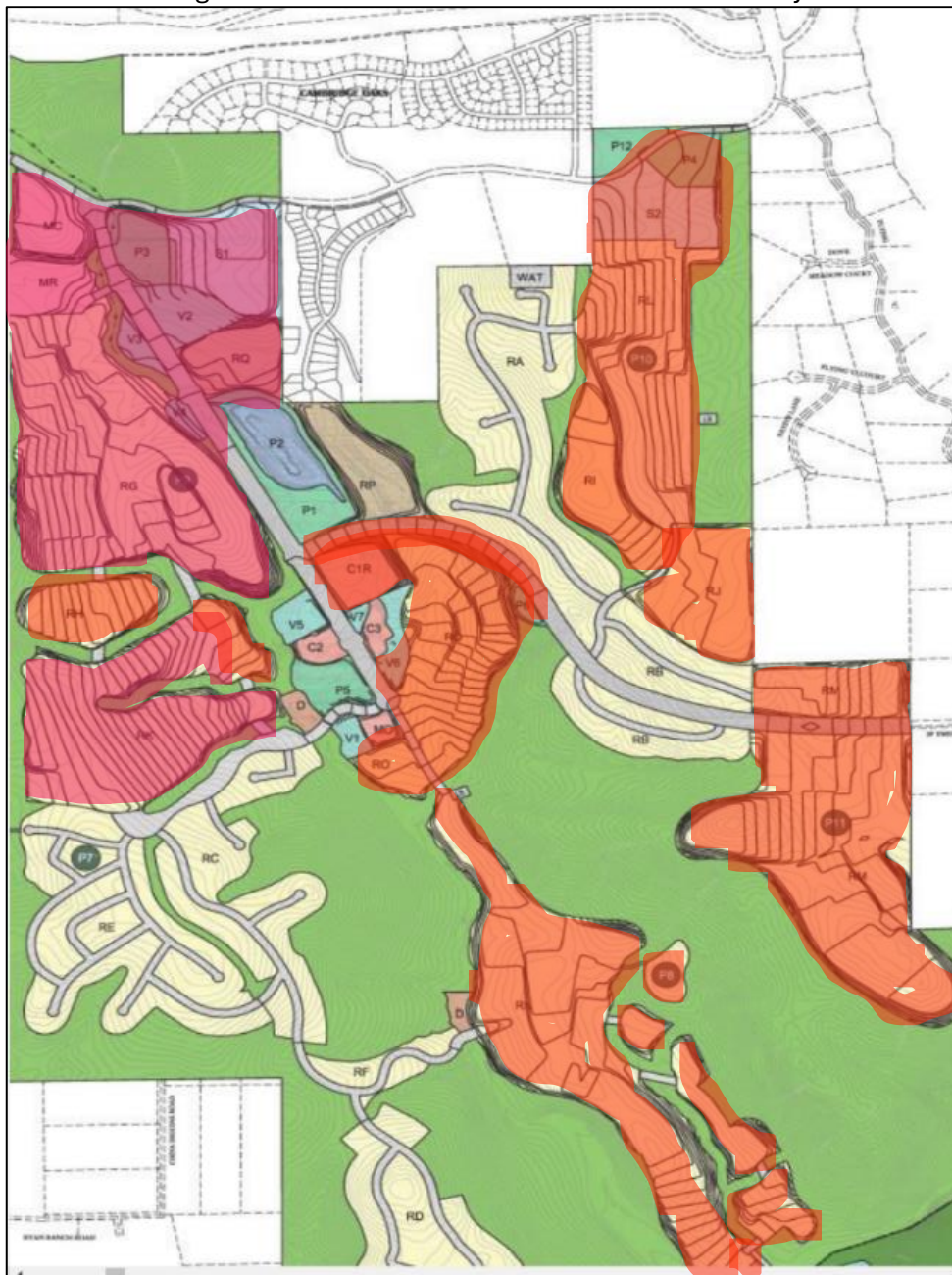
Albeit comparing apples to oranges, I find it hard to reconcile the mass grading area of 712 acres with 150 acres of canopy where only 130 acres are impacted. Does having 1137.8 acres of canopy justify impacting 227.6 of Oakland?

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
<b>Totals</b>		<b>1,137.8</b>	<b>227.2</b>
<b>Maximum Oak Canopy Impact per GP Policy 7.4.4.4</b>			<b>227.6</b>
<b>Minimum Oak Canopy to be Retained per GP Policy 7.4.4.4</b>			<b>910.2</b>

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
<b>AREAS TO BE MASS GRADED</b>			<b>712.0</b>	<b>3,043</b>	
<b>Percent (%) of Total</b>			<b>78%</b>	<b>94.0%</b>	
<b>TOTAL RESIDENTIAL PLANNED</b>			<b>909.0</b>	<b>3,236</b>	

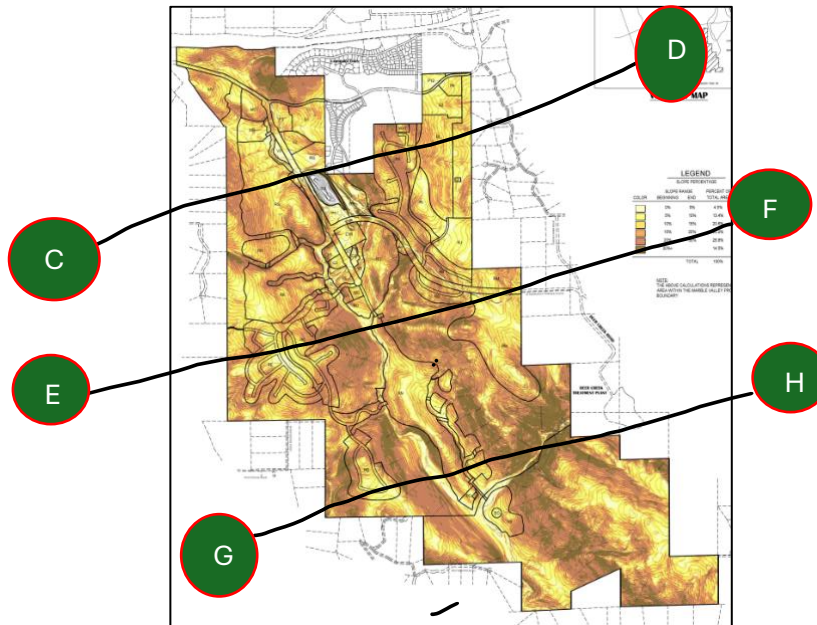
Below: Excerpt of Figure B.8 Preliminary Rough Grading Exhibit, Site design Standards b-18 MVSP- Public review draft -May 2023



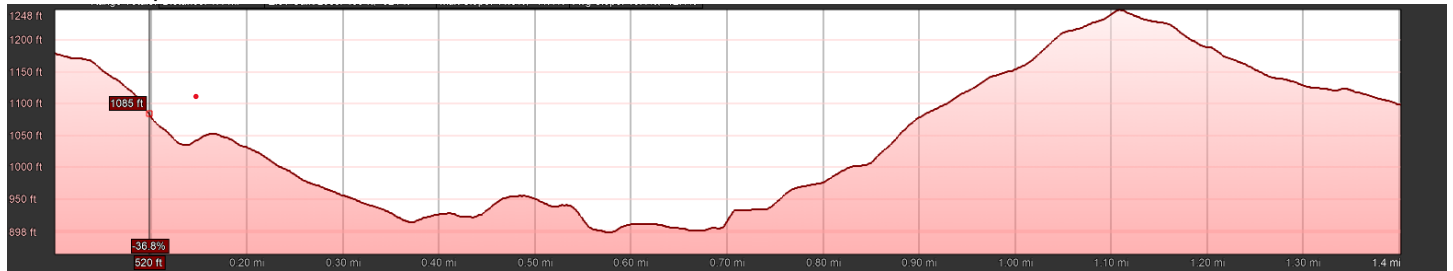
Just by visual inspection one may appreciate the impact of mass grading shall have.

**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



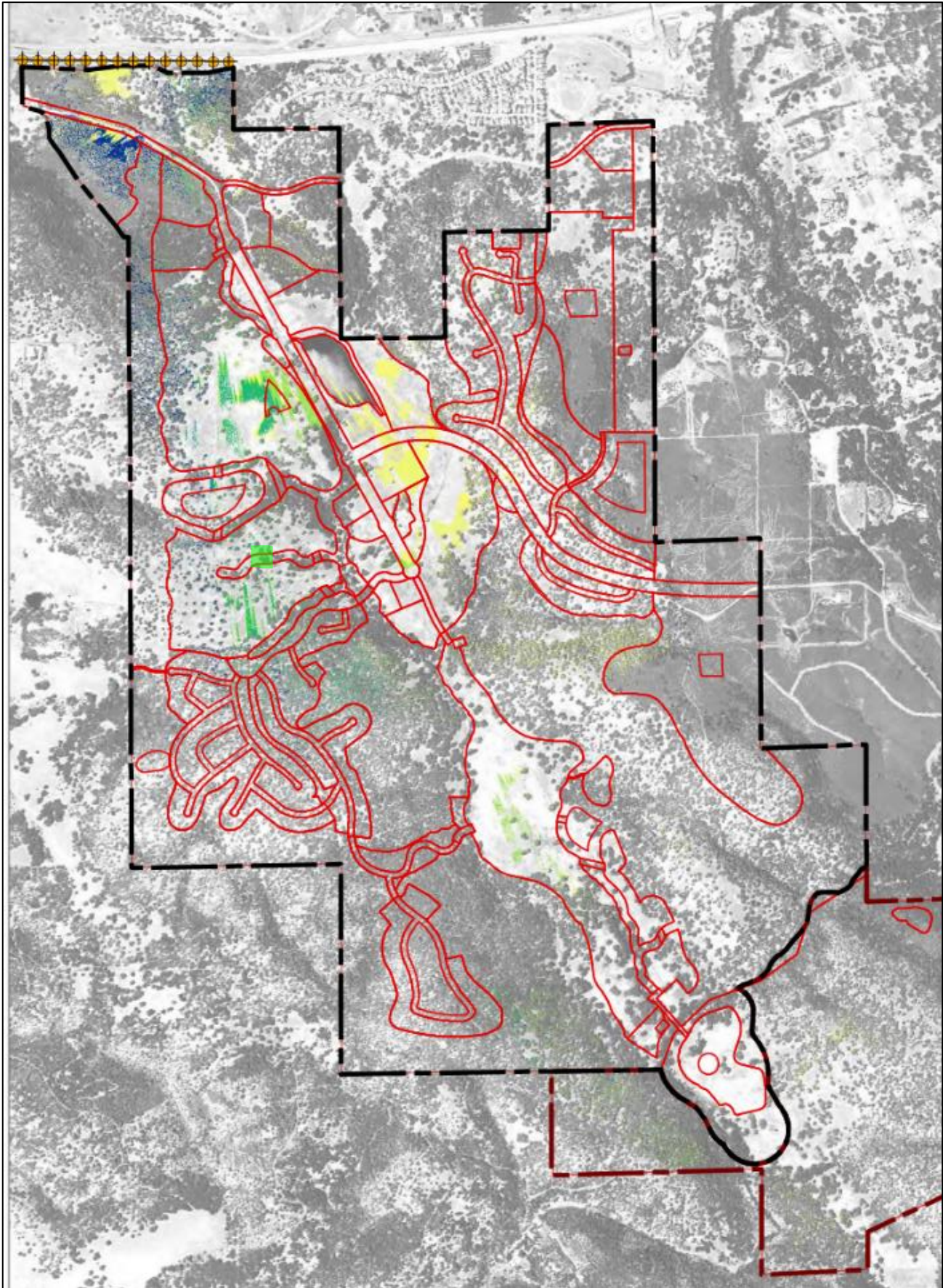
Cross section G > H



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

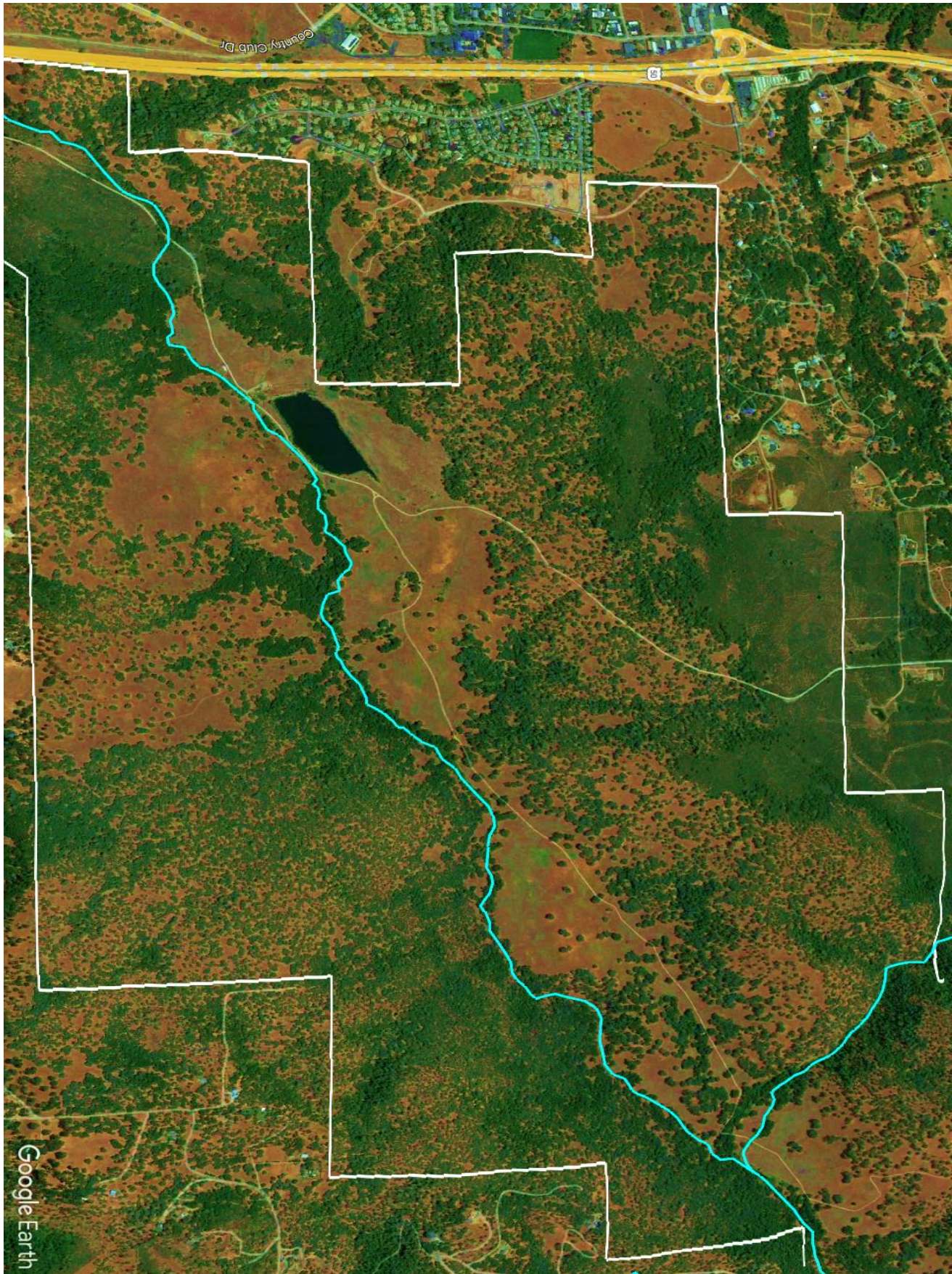


**EXHIBIT 1: MAPS**

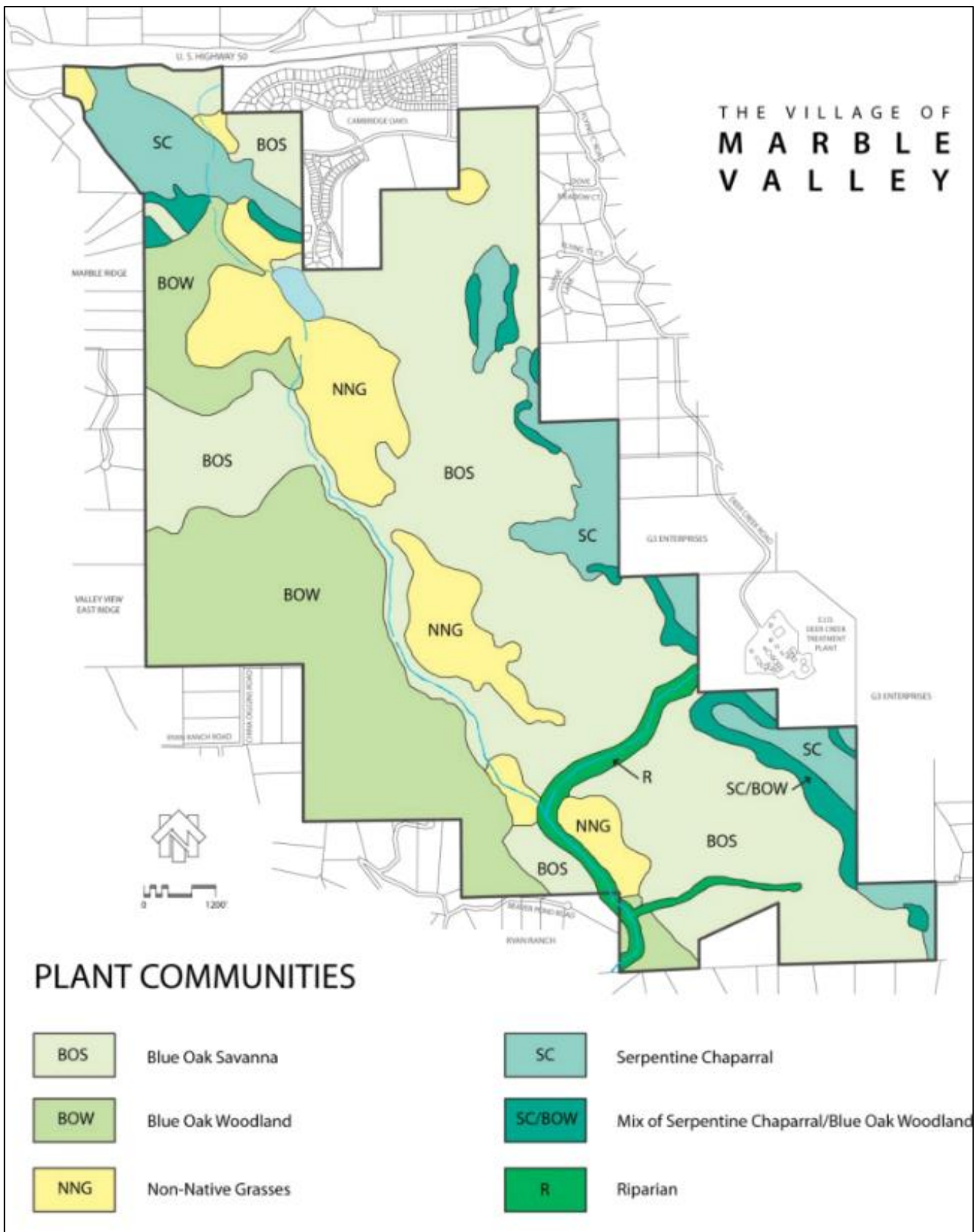




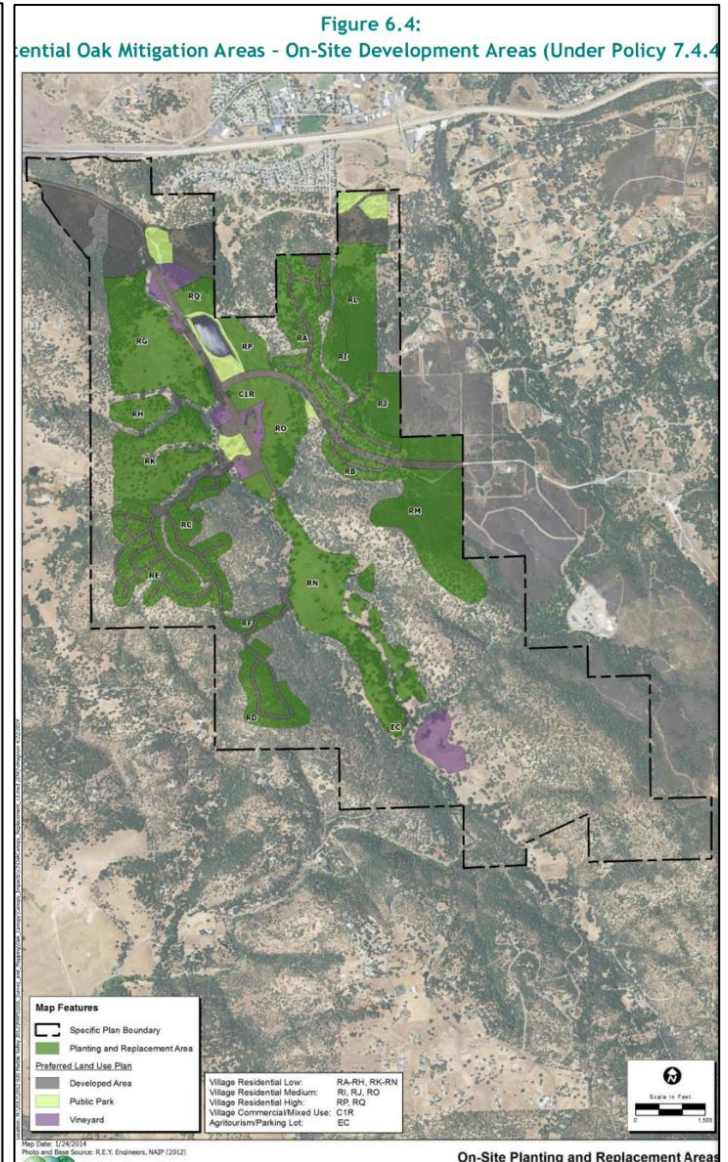
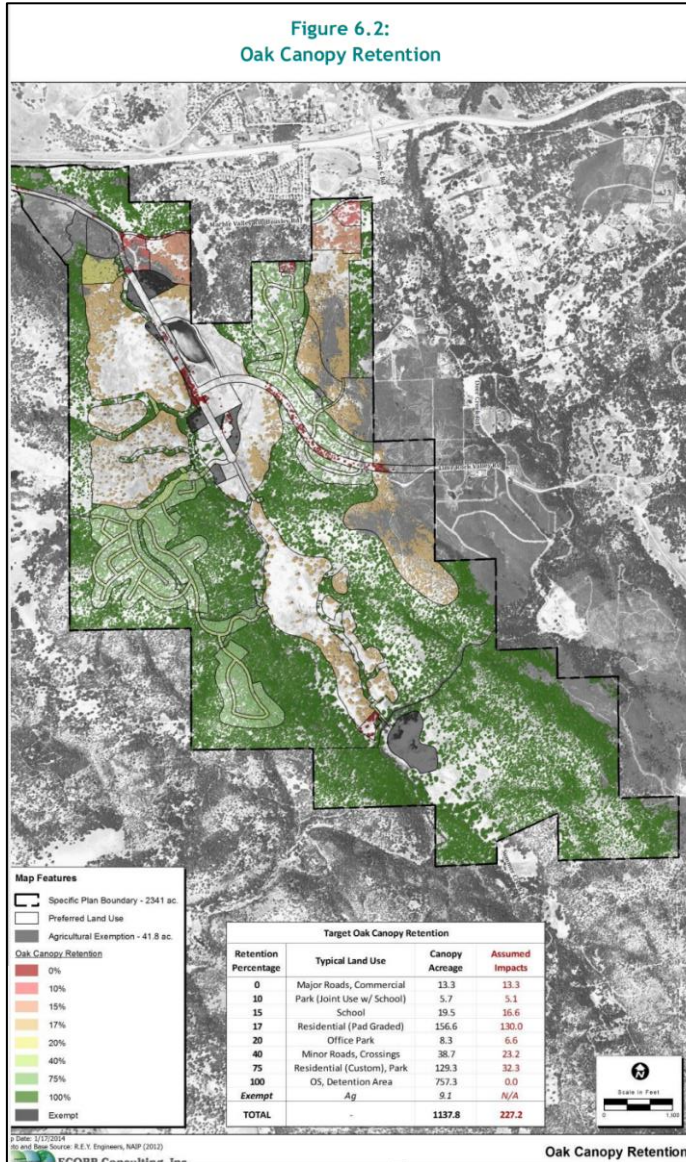
Google Earth – 2021 Canopy Coverage







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**

