**El Dorado Hills Area Planning Advisory Committee**

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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.

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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.

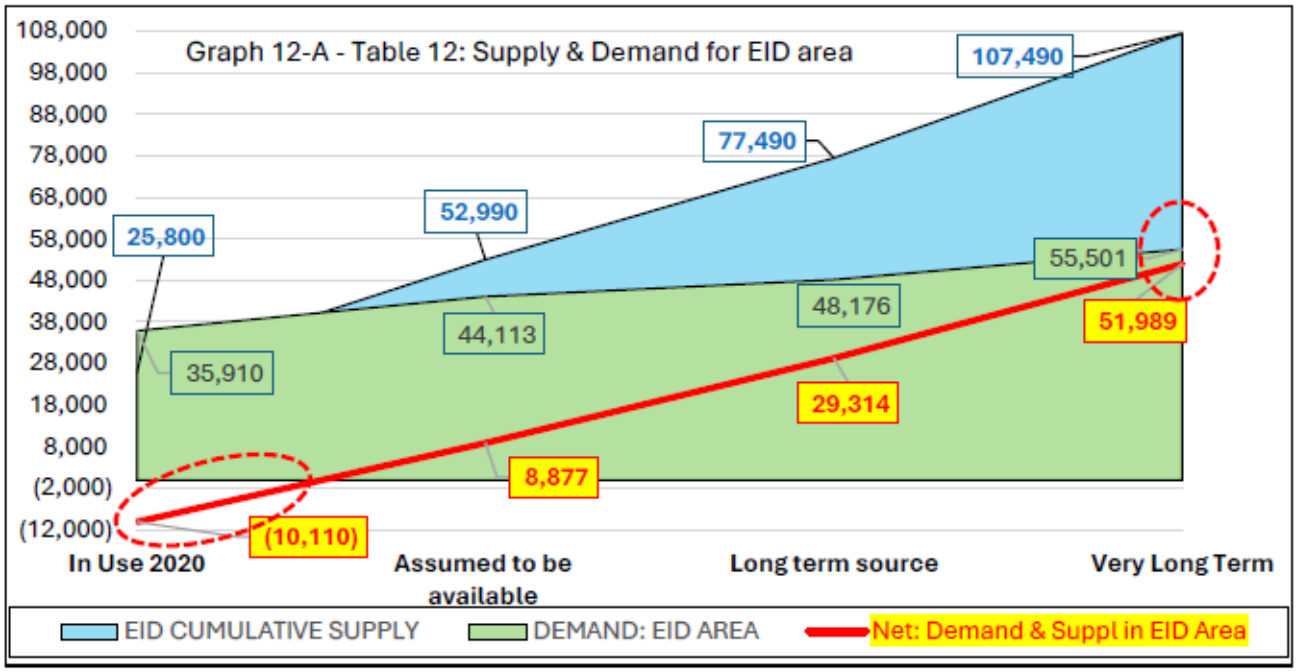
I detail this assumption because it is critical in determining the supply and demand estimate for the EDH area.

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.

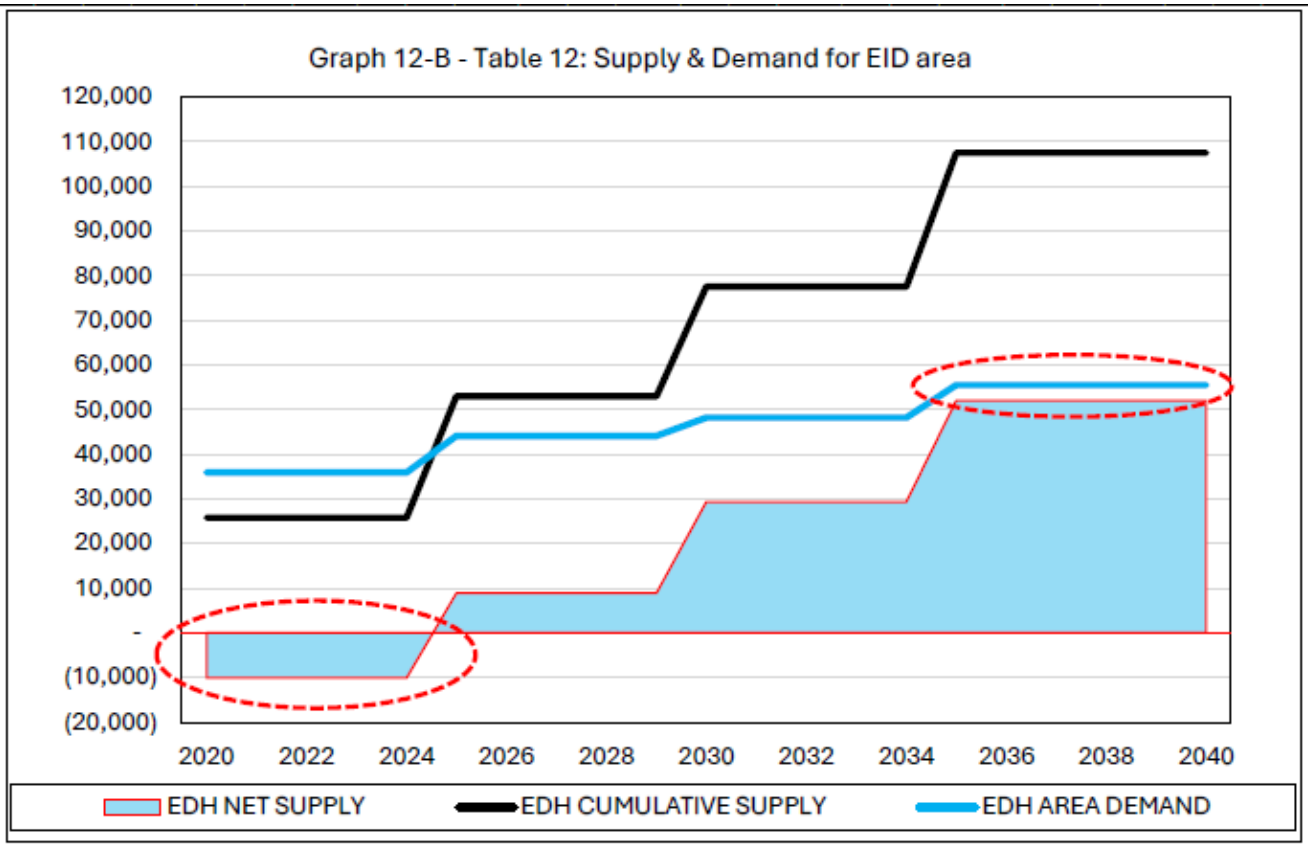
---

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** |



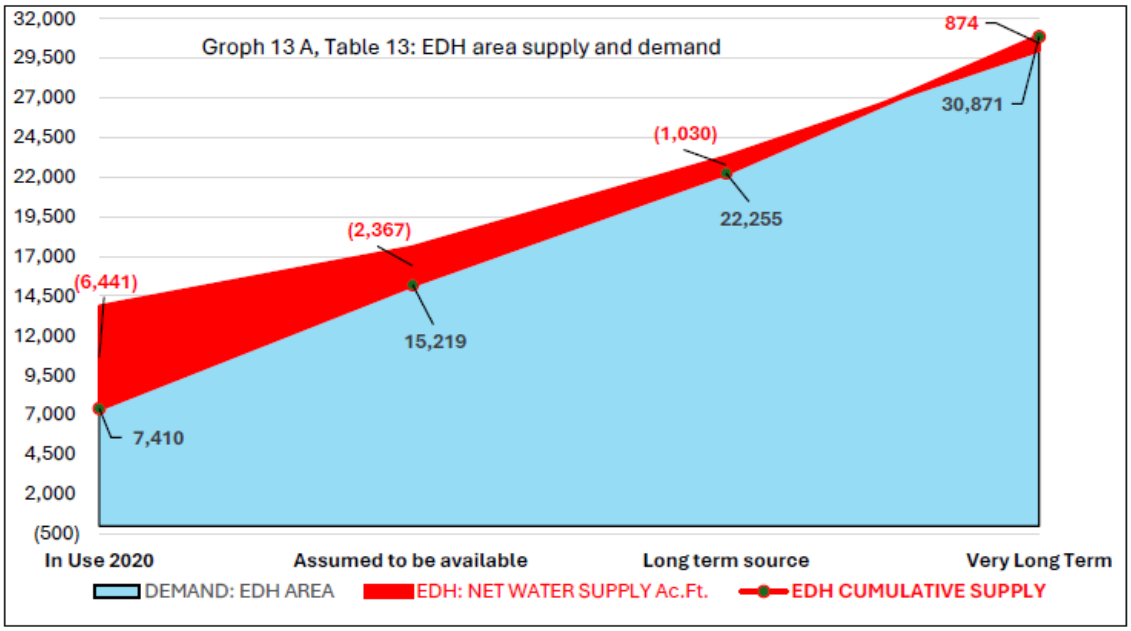

Maybe viewing the data in a different graph (12-B) shall illustrate EID's overall supply and demand situation better showing a small deficit in the 2020/25 period largely because of the net water demand of approved projects in the area. The data also shows that in the very long term the S&D balance is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

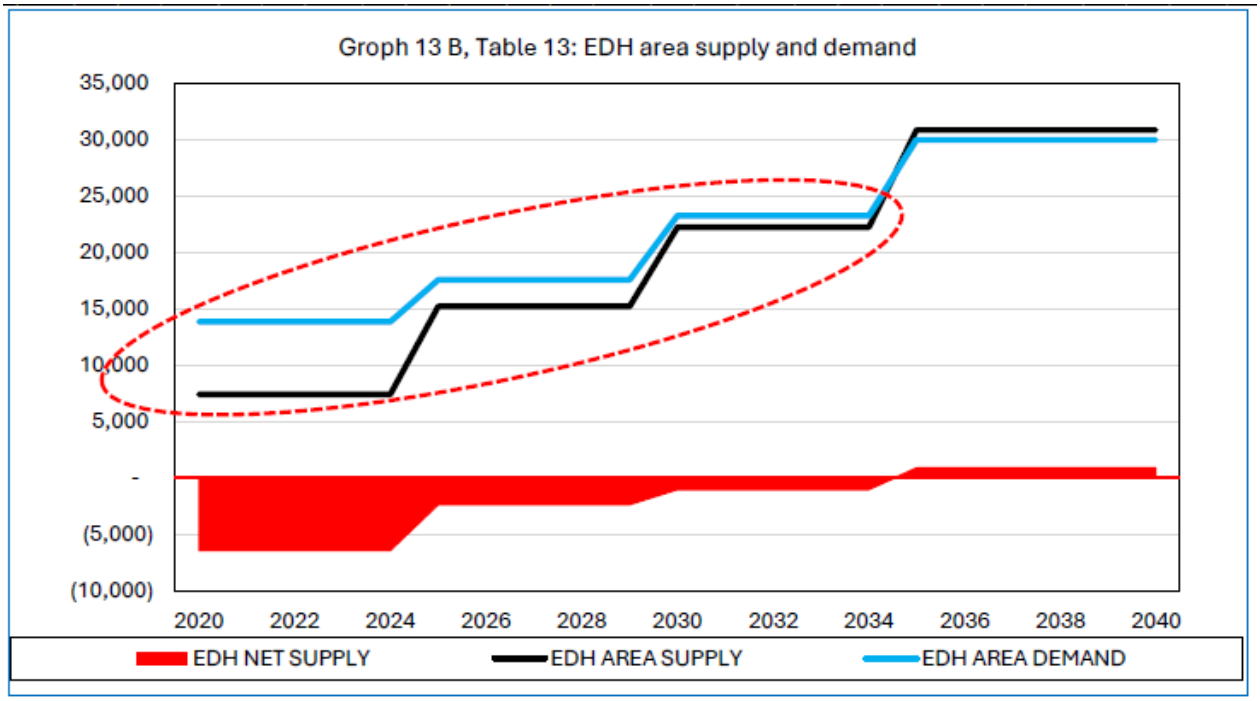



Conclusion: The EID area is not particularly threatened by a deficit of supply except possibly in the short run. However, this is largely dependent on the current net demand situation, that given the coarseness of the demand data derived requires better market data.

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:

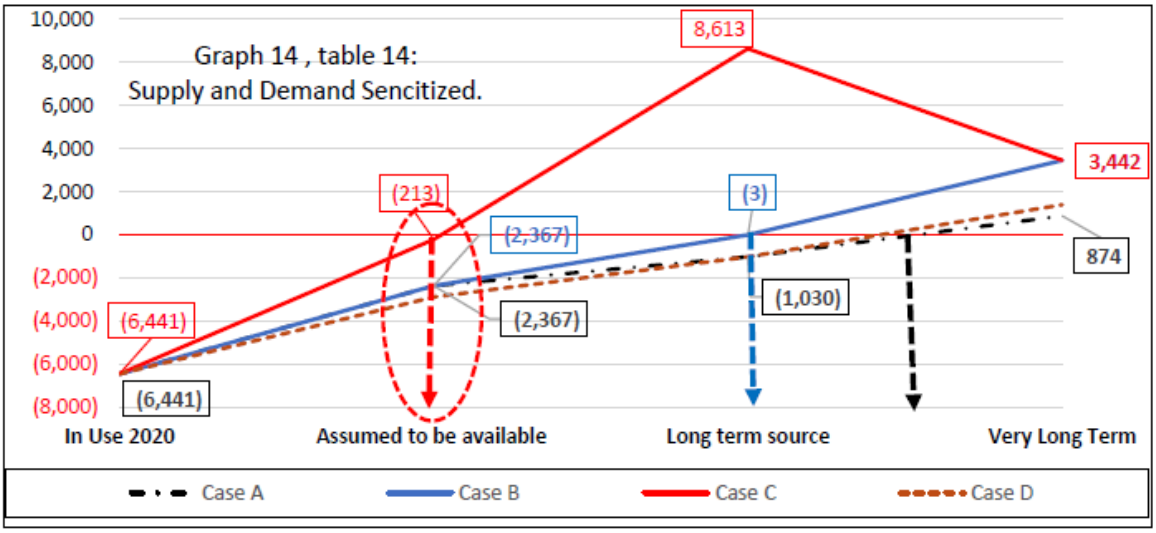
➢ For water supply, which in this case is dependent on EID's capital investment program to secure the water right in Exhibits 8 & 9; and

➢ 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.

<u>General Mobile Source Emissions Quantification Errors or Omissions</u>

- **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).

<u>Cumulative Impacts Analysis Does Not Provide Adequate Information to Determine Impact of Project</u>

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].

<u>Lack of Quantitative Assessment of Health Impacts from Proposed Project</u>

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:

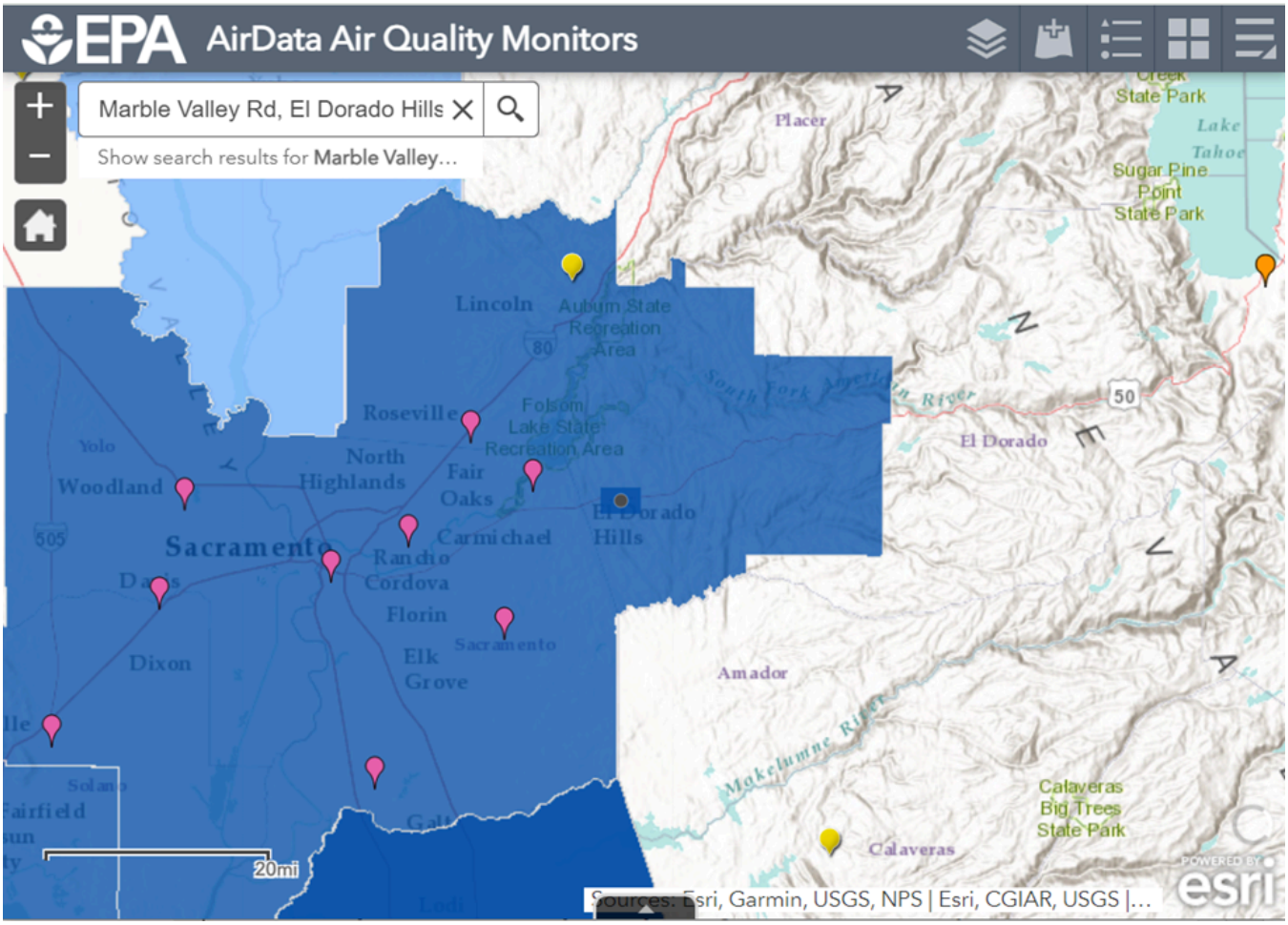
1. A quantitative assessment of risk from DPM to the residents and public residing in the VMVSP during the 20-year construction period is not included in the analysis. A CO Hot-Spots analysis was conducted, but there is not a quantitative analysis of the impacts of DPM emissions on the residents of the 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.

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[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”*