



CAMERON PARK COMMUNITY SERVICES DISTRICT

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June 5, 2024

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

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

Deputy Director Peters,

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

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

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

The County is processing a Development Agreement (DA) with the applicants for the proposed **Village of Marble Valley and Lime Rock Village (DA14-0002/DA14-0004)** projects. The DA is an agreement adopted by ordinance and negotiated between a developer and the County. If approved, the DA establishes the timing and conditions under which the development may occur. El Dorado County Zoning Ordinance Section 130.58 (Development Agreements) outlines the regulations for establishing a DA within the County.

Your organization may have an interest in providing terms for consideration in the DA process for these projects. However, we cannot guarantee any requested terms will be included in the recommended or final DA.

Please respond to this email with any terms identified for consideration in the DA by **COB Friday, June 7, 2024**.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully submitted,



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Additional CCs in a separate transmittal:

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