



Proposed Development of Lake Camanche Village 3B Subdivision

Milton Bender <miltonbender@volcano.net>

Sun, Oct 11, 2020 at 2:46 PM

To: planning@amadorgov.org

10/11/02020

Dear Planning and TAC Committee,

Thank you allowing me to share my concerns in regards to the Camanche 3B sub-division project.

I will be brief as possible with my comments and concerns as follows:

1. The negative impact that increased traffic will have on the village roads, I believe there should be 2 paved roads exiting out of the proposed 3B division to Camanche Parkway or Hwy 88 to reduce traffic in the village and most importantly as proper emergency/fire exits.
2. Water and sewer availability for the new project. There are already existing strains on the infrastructure in the village area.
3. Should this project be approved , I would request that the entire infrastructure for the 3B project be installed prior to any lots being sold in that sub-division.
4. I would request that an up to date/new Environmental impact study be completed.
5. I have concerns about the developer Ryan Voorhees and the negative articles I have read about past developments he has been involved with.

Thank you for your time and please consider seriously the impact this will have on the existing community and environment before approving this or any future project.

Milton Bender
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lone Ca 95640

miltonbender@volcano.net
209-274-9112



Chairman Mike Israel
County Technical Advisory Committee
810 Court St
Jackson, CA 95642

October 12, 2020

By e-mail transmittal to Chuck Beatty for distribution to October 14, 2020, Technical Advisory Committee members and meeting attendees

Re: Camanche Village Unit 3B Scoping Comments

Dear Chairman Israel and Members of the Technical Advisory Committee:

Section 15130 of the CEQA Guidelines requires analysis to determine whether or not a proposed project may have a significant impact on the environment due to cumulatively considerable environmental impacts, even when the environmental impacts of the project itself may be limited. Cumulatively considerable, as defined by Section 15065(c) of the CEQA Guidelines, means the incremental impacts of an individual project are considerable when viewed in connection with the related impact of recent past projects, other current projects and probable future projects. When the project has possible cumulative impacts, a comprehensive CEQA analysis is required.

Since the subdivision map for Camanche Unit 3B received final approval prior to CEQA, the subdivision map approval itself is not subject to CEQA. However, the approval for the planned infrastructure improvements is discretionary and therefore is subject to CEQA.

CEQA requires the lead agency to examine the reasonably foreseeable impacts of its decision, in this case the approval of infrastructure improvements. The proper CEQA baseline is *existing* conditions (vacant land) and the impact would be the change from those conditions that would likely result from approval of the infrastructure improvements. The proposed improvements would facilitate construction of previously approved homes that do not exist at present.

Please note that in *City of Antioch v. City Council (1986) 187 Cal.App.3d 1325*, the court held that a city's analysis of a proposed road and sewer project must take into account future development that would utilize the improved infrastructure.

The appropriate question for the required cumulative impact analysis for this project is: If the proposed infrastructure improvements are approved, what would be the reasonably foreseeable level of development that would then occur, and would that development, considered along with other foreseeable projects that could be completed in the vicinity in a similar time frame, result in cumulatively significant impacts to the environment?

Because the subdivision was previously approved, the reasonably foreseeable development would be number of houses that could be built and the impacts resulting from their construction and use. These would include not only the 281 single-family units approved through the tentative map process, but also additional dwelling units that might be built, since SB 13 now permits construction of an accessory dwelling unit (ADU) on any single family home lot in California. A reasonable level of ADU construction should be estimated and these units added to the total number of housing units likely to be built.

In addition, other recent, current, or foreseeable projects in the vicinity should also be taken into consideration, including the new Harrah's Northern California Casino, the proposed Ninnis-Goose RV Park, the Jackson Valley quarry expansion, recent or planned road improvement projects, and any other approved or reasonably foreseeable projects county staff and consulting agencies find in their review for the project. The cumulative impact analysis must evaluate potential cumulative impacts on traffic, vehicle miles traveled, greenhouse gas emissions, demand for services (fire protection, emergency medical services, police, schools, etc.), as well as water supply and wastewater treatment.

Questions regarding the availability of water for the project alone requires preparation of a detailed CEQA analysis. According to a letter submitted by the Amador Water Agency, the agency does not have sufficient capacity to extend services to this subdivision that was approved a half-century ago, and a new well would be required for potable water supply. This is problematic because the Camanche 3B area is located in the Eastern San Joaquin Subbasin. The California Department of Water Resources has identified that subbasin as one of the state's 21 critically overdrafted subbasins. The related groundwater management authority has concluded that the basin is already overdrafted by 78,000 acre feet per year. Therefore, further groundwater pumping in the basin would be a significant environmental impact. The CEQA analysis must take these facts into account. We ask that the full groundwater sustainability plan, included at this link, be incorporated into the record for this project - <http://www.esjgroundwater.org/>

Sincerely,



Sherry Pease
Executive Director

Cc: Mr. Brian Brown,
Buena Vista Rancheria of Me-Wuk Indians
John Gedney, Amador County Transportation Commission
Larry McKenney, Amador Water Agency
Eastern San Joaquin Groundwater Authority
East Bay Municipal Utility District

October 13, 2020

Chuck Beatty, Planning Director
Amador County Community Development Agency, Planning Department
810 Court Street
Jackson, CA 95642-2132

Re: Notice of Public Scoping Session – Lake Camanche Village Subdivision Unit 3B,
Amador County

Dear Mr. Beatty:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the scoping session for the Lake Camanche Village Subdivision Unit 3B located in Amador County (County). EBMUD commented on the Negative Declaration for the project on May 5, 2008. EBMUD's original comments (see enclosure) still apply. EBMUD has the following additional comments.

GENERAL

In 2009, EBMUD entered into a Safe Harbor Agreement (Agreement) with the United States Fish and Wildlife Service. This important Agreement provides further considerations in regards to federally listed species management and protection on EBMUD lands enrolled in the Agreement. Compliance with the requirements of the agreement will have to be addressed during the scoping of this project, as it pertains to EBMUD property. Construction of new facilities (including roads) is not allowed under the Agreement, and the proposed road construction could lead to unpermitted take of listed species for which EBMUD would be responsible.

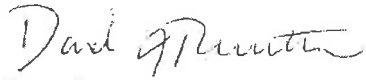
Additionally, in consideration of constructing an access road through EBMUD property, we have serious concerns in regards to the significant conflict between disparate adjacent land uses – residential development and firearm-based hunting on the open landscape.

At this time, EBMUD does not support construction on EBMUD lands due to the impact to existing operations in that area, and the listed species impact. Any construction proposed on EBMUD property cannot be assumed without consultation with EBMUD and approval and compliance with all regulatory requirements.

Please e-mail future notices regarding this project and other CEQA projects to timothy.mcgowan@ebmud.com, planning.review@ebmud.com, and jac.tan@ebmud.com. If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Chuck Beatty, Planning Director
October 13, 2020
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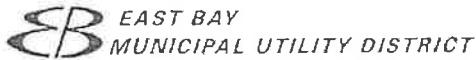
Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:TRM:btf
sb20_216.doc

cc: Ryan Voorhess
Old Golden Oaks, LLC
801 Briarwood Street
Weatherford, Texas 76087



May 5, 2008

Nathan Lishman
Amador County Planning Department
810 Court Street
Jackson, CA 95642

Re: Notice of Intent to Adopt a Negative Declaration – Lake Camanche Village
Unit 3B Development, Amador County

Dear Mr. Lishman:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Negative Declaration for the Lake Camanche Village Unit 3B Development in Amador County. EBMUD has the following comments.

GENERAL

EBMUD is very concerned with development within the Camanche watershed. EBMUD owns considerable land in the area and is responsible not only for recreational activities on Camanche Reservoir but also for water releases (quantity and quality) to manage the fisheries in the Lower Mokelumne River.

It should be noted that the Map Act does not “operate to defeat the legitimate exercise of the police power of a municipality in connection with matters outside the scope of the act and which are not calculated to circumvent its express provisions...” *Lincoln Place Tenants Association v. City of Los Angeles* (2007) 155 Cal.App.4th 425 (quoting *McMullan v. Santa Monica Rent Control Bd.* [1985] 168 Cal.App.3d 960, 962-963, 214 Cal.Rptr 617). Thus, “[w]hile the act may be the final word respecting the subdivision process, it does not purport and may not be understood to be preemptive of all land use regulation,” particularly laws related to species, wetlands, and other natural resources. *Id.*

EBMUD is concerned that the narrow scope of the Negative Declaration has deferred a complete and necessary analysis of the impacts from the construction of the Lake Camanche Village Unit 3B Development. As the Negative Declaration notes, there are several listed species that may be impacted by the development. In addition, full development of the planned units, in addition to the construction of the roads, will result in urban runoff that could reduce the water quality in Camanche Reservoir and ultimately impact aquatic species in the Lower Mokelumne River, including listed fish species. Additionally, EBMUD and Amador County have historically worked together to jointly manage water and wastewater issues at Camanche North Shore. California

Environmental Quality Act documents should clearly discuss urban runoff and impervious surfaces, as well as describe the water supply source and treatment and the wastewater treatment and disposal for the development.

EBMUD expects that the County will ensure that the developer of this 281 home development on roughly 300 acres undertakes this project in compliance with state and federal species protect laws, wetlands and water quality requirements, and permitting requirements regarding stormwater discharges and other discharges that may impact Camanche Reservoir and the surrounding EBMUD lands.

PROJECT RELATED

On page 3.0-57, under Section 3.8 Hydrology and Water Quality, Operation Drainage and Water Quality Impacts, the Initial Study does not mention the use of weed control measures for the emergency access road (mechanical or herbicidal). Either method, if used improperly, could cause degradation of water quality by potential soil erosion or chemical contamination. Additionally, while the emergency access road will be locked, there is potential for security breach and vandalism, which could lead to uncontrolled dumping of hazardous materials and water quality impacts if not monitored and mitigated. These potential water quality impacts should be analyzed in the Negative Declaration and the potential impacts should be mitigated.

On page 3.0-76, under a) of Discussion of Impacts, it states that the proposed project "would not directly or indirectly result in the expansion of such services" with services being identified as new water and/or sewer service mains. It is EBMUD's understanding that wastewater capacity is currently limited and that an increase in capacity is needed. As stated in the Mokelumne/Amador/Calveras Integrated Regional Water Management Plan (November 2006), the water demand in the area is anticipated to grow at a rate of 2.9 percent annually. This increase in demand would result in the need for additional capacity in water and wastewater services and should be analyzed in the environmental documentation. EBMUD has been working with Amador County and will continue to do so on this issue.

EBMUD requests the opportunity to review and provide comments on the Recreation, Fire Management, and Rangeland Management Plans as they are developed. EBMUD also intends to review the stormwater management plans and other documents prepared for this development.

Please note that Amador County must obtain an easement or license from EBMUD for the Emergency Vehicle Access (EVA) road crossing EBMUD property. If the Amador Water Agency plans on using the EVA road, they must also obtain an easement or license from EBMUD.

Nathan Lishman
May 5, 2008
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If you have any questions concerning this response, please contact David J. Rehnstrom,
Senior Civil Engineer, Water Service Planning at (510) 287-1365.

Sincerely,



William R. Kirkpatrick
Manager of Water Distribution Planning

WRK:TNS:sb
sb08_120.doc



October 13, 2020

Chuck Beatty, Planning Director
Community Development Agency
810 Court Street
Jackson, California 95642

Dear Mr. Beatty:

I am writing in response to the proposed development of land which is adjacent to the Camanche Hills Hunting Preserve.

Camanche Hills has been a respected and vibrant part of the Amador community since 1978. It has been our pleasure to partner with them through the years, as they offer a multitude of family outdoor sporting activities. As you know, their facility is located on 1500 beautiful acres in the foothills of the Sierra and is currently leased from the East Bay Municipal Utility District. Family owned and operated, Camanche caters to sport shooting enthusiasts from all over the state and they offer exceptional instruction in safety and technique - valuable tools for such outdoor activities. Additionally, they strongly support the heritage and discipline of hunting and encourage families to teach such responsibilities to their children. They offer guided hunts, are the largest sporting clay and shooting sport facility in California, have a 3-D archery range, an onsite restaurant, pro-shop and also provide a popular county event venue. Put simply, Camanche Hills Hunting Preserve and Sporting Clay facility's existing use and long-standing business relationship with the County serves as a valuable resource for residents of Amador and beyond.

The hunting season begins in October and extends through March, and given this and other extenuating circumstances such as the year-round use of outdoor target shooting, approval of land development for multi-family housing in such close proximity to Camanche is not compatible. In the most possible robust terms, I would encourage the County's reconsideration of this particular project. The public participation process is vital to the future of Amador County – an area that boasts a phenomenally beautiful rural lifestyle in an ever-increasingly urban California.

I appreciate the opportunity to express the concerns of Gun Owners of California.

Respectfully,

Sam Paredes, Executive Director

GUN OWNERS OF CALIFORNIA
1190 Suncast Lane, Suite 2, El Dorado Hills, CA | (916) 984-1400 (916) 984-1402 fax
www.GunOwnersCA.com

A Political Committee Dedicated to Crime Control – Not Gun Control

Linda & Larry Patterson
1675 Duck Creek Road
Lone, CA 95640

Comments

Lake Camanche Village Unit 3b
Initial Study/Environmental Checklist
October 10, 2020

The following are our comments on the 2020 Initial Study/Environmental Checklist for the Lake Camanche Village ("the Village") Unit 3B. Please include our comments in the record of the October 14, 2020 TAC Meeting.

Comments on Initial Study/Environmental Checklist

XVII – Transportation

Emergency Access/Evacuation – The 2020 Initial Study/Environmental Checklist indicates that the project will have an impact that is less than significant with mitigation. From the 2007 MND this finding is related to the emergency access road that will be provided as part of the project. However, it does not acknowledge the impacts to emergency access/egress for residents during a major fire. There will be only one way in or out for the new (and existing) residents needing to evacuate. With climate change and the increased fire hazards in California it is essential that a second paved, public vehicular access be provided as part of the project. This could be done by upgrading the planned emergency access road or as a separate access that would provide a separate access to an external regional roadway. The new (and existing) residents cannot be effectively evacuated in an emergency if all are required to use Village Drive to access Curran Road and safety.

Construction Impacts on existing streets - The mitigation monitoring plan should include a verification of impacts of construction on the condition of Goose Creek, Duck Creek and Village Drive. Photo Documentation should be recorded of conditions before and after construction and repairs required where truck traffic has resulted in degradation of the pavement condition. Alternatively, all construction traffic could be required to use the new emergency access road during construction.

XX Wildfire

Evacuation Plan – The 2020 Initial Study/Environmental Checklist indicates that there is a less than significant project impact that would “substantially impair an adopted emergency response plan or emergency evacuation plan.” A meaningful and effective emergency evacuation plan is not possible with only one way in and out of the entire Village. The Village circulation system relies on a single “spine” roadway, Village Drive. All other roadways are cul-de-sacs or loop to and from Village Drive. None provide direct egress out of the development. Anyone evacuating from the Village must use Village Drive between Grapevine Gulch and Curran. Our residents could easily be trapped without a second evacuation route when a wildfire originates near Curran Road. Adding the new homes and residents to this problem compounds the significant threat to

public health and safety. The new residents would have the farthest to travel if required to egress the Village at Curran. A second public access road connecting the Village to Camanche Parkway North, State Route 88 or another existing regional roadway should be required as part of the project.

XIX Utility System and Services

Wastewater treatment - The project includes a new wastewater treatment facility but on page 3.0-76 the 2007 Neg Dec states that "The proposed project would not require the construction of new water or wastewater treatment facilities." The Environmental Checklist indicates that water and wastewater utility impacts are not significant **with mitigation**, but the mitigation monitoring plan only requires a letter of water availability from AWA. No reference is made to the project's construction of the wastewater treatment facility or mitigation of potential impacts of this part of the project. The 2020 Initial Study/Environmental Checklist indicates the wastewater impact to be less than significant with mitigation. The new environmental document needs to be clear that the project is self-mitigating if lots cannot be sold and occupied until the new wastewater treatment facility is completed and operational.

Water System and Supply – The 2007 Mitigated Negative Declaration requires a letter from AWA indicating that sufficient water supply is available to serve the project. The 2020 Initial Study/Environmental Checklist indicates that the impacts to the water system and supply are not significant if mitigated. Requesting an "ability to serve" letter is not an adequate mitigation. The County should request a plan from AWA regarding how the new subdivision will be served and steps that will be taken to avoid any impacts to existing private wells within Lake Camanche Village. The study should include consideration of impacts during prolonged drought. More frequent and more severe droughts are anticipated impacts of climate change. This was not known when the 2007 MND was prepared. AWA should also be required to certify that the system of fire hydrants in Unit 3B and elsewhere within the Village are operating properly

Related Comments on Process

Previous Mitigated Negative Declaration – The November 2007 MND is provided as Appendix A to the 2020 Initial Study/Environmental Checklist. Simply republishing this document without significant additional analysis will not adequately address the Lake Camanche Village residents' concerns.

Timing of Project Components - Completion of all project components must be required prior to the sale of and construction on any of the Unit 3B lots. Otherwise, significant impacts will not be mitigated.



Public Scoping Session TAC 10/14/2020

SAM KING <samking@aol.com>
To: planning@amadorgov.org

Wed, Oct 14, 2020 at 2:04 PM

I would like to object to the placing of the waste water system for the residents of Unit 3B in the middle of 3A. It belongs where the waste water is created.

Further, it would reduce the effort to create the system since it would not require digging up Village Drive and inconveniencing everyone who lives in the back of 3A. Also the cost should be significantly less.

Just an indication of how inconsiderate that Ryan Voorhees and Old Golden Oaks, LLC and what a bad neighbor they would be.

Sam King
1464 Goose Creek Rd.
(SamKing@aol.com)



Camanche 3B Scoping

T B <boitanotb@gmail.com>
To: planning@amadorgov.org

Wed, Oct 14, 2020 at 2:26 PM

Attention: Amador County Technical Advisory Committee

My husband and I have lived in the Jackson Valley area, at 5001 Buena Vista Road, for 34 years. We've seen many changes in our agricultural community during this time which have negatively affected us.

We're sending this email because we understand that regarding the scoping analysis of Camanche 3B, the County is presently of the opinion that the 281 previously approved lots in the Camanche 3B phase do not have to be considered. Nothing could be further from the truth.

The County is obligated by governing law, in this case, the California Environmental Quality Act ("CEQA"), to analyze all foreseeable future impacts. Although the 281 lots were approved prior to CEQA, the fact remains that "cumulatively," they will have a dramatic impact on our community, and therefore must be included in your analysis.

We cannot comprehend the County ignoring so many significant impacts. It is no secret that our water tables are already depleted and contaminated. We can't imagine the effects that 281 new homes will have on those water tables. Our area's traffic issues are no secret as well.

We are glad our children are now adults so that we won't have to worry about putting them on the County's school busses with the additional traffic. Those busses have to traverse old, narrow, country roads, already in disrepair. But add to that, not only the traffic from the new casino (which is always in a hurry to get there, and often too tired to be driving home), but the additional commuter traffic, inherent to 281 new homes. They both drive these roads like they're in a NASCAR race! They honk at our slow moving busses, pass those busses on blind turns, and double yellow lines. Not to mention, running stop signs. We've seen it, so we know it.

Additionally, to ignore the effects on our agriculture, both livestock and crops, is unacceptable. And we are not "liberal tree huggers." But our area has seen it's share of environmental contamination, such as the carbon omitted from the pipes of the old carbon plant across from the casino. We recall the black soot that could be seen each morning on my white horse trailer. It was omitted from the plant, often under the cover of the darkness of the night. That soot was also on the grasses and hay that our livestock ate, and the vegetables that we ate, and the water we drank. Additionally, was the contamination to our ground water from the poisons leached from the dump.

We must be more prudent in protecting our community. And for the County to ignore the future foreseeable impacts of Camanche 3B is not only against governing law, it would be the height of irresponsible behavior to turn a "blind eye" on the future foreseeable impacts of 281 additional homes in our area.

As long time members of this community, we ask that you include the cumulative impacts that Camanche 3B will have on what is considered the prime agricultural land in our county, and our lives.

Thank you for your time and consideration.

Teryn and Wayne Boitano

