

August 27, 2015

Ms. Karen Osborn, Clerk of the Board of Supervisors
Honorable Cliff Edson, Chairman, and
Supervisors Ponte, Kearney, Oliveira, and Wright,
Calaveras County Board of Supervisors
891 Mountain Ranch Road
San Andreas, CA 95249-9709

VIA ELECTRONIC MAIL & HAND DELIVERY TO BOARD CLERK:

kosborn@co.calaveras.ca.us

Re: Appeal of Planning Commission August 13, 2015, Action and Resolution 2015-017 approving a Modification to Existing Permit (MEP 2012-038) for the Olive Orchard Estates Subdivision (Project 2003-157) for Applicant Old Golden Oaks LLC—Ryan Voorhees and removing the requirement for certain off-site improvements to Olive Orchard Road

Dear Ms. Osborn and County Board of Supervisors,

By this letter, Joyce Techel, Carol Parks, Don Kuhn, Lora Most, Don Most, and Clyde Clapp (“Appellants”) do file an Appeal of Planning Commission Resolution 2015-17 approving the 2012-038 MEP for Olive Orchard Estates, and allowing for removal of Olive Orchard Road CEQA Mitigation Measures XV-7 (1. and 2.). These mitigations were to be road improvements constructed on the reach of Olive Orchard Road between the subdivision and State Highway 26, as well as left turn lanes at the intersection with Hwy. 26.

We are appealing the Planning Commission decision because we do not agree with the findings the Resolution was based on; we believe there were important points the Planning Commission did not adequately consider and the analysis done by Planning was incomplete; and we feel there was a lack of balanced consideration by all commissioners before reaching the decision. We will be submitting further explanation and documentation of the basis of our Appeal.

Appeal. Section 17.98.040 of county code provides for an appeal avenue to the Board of Supervisors “within 15 calendar days from the date of the commission decision.”

Filing Fees. As required, we have paid One Hundred Dollars (\$100.00) to satisfy filing fee requirements for this appeal.

Aggrieved Party. Pursuant to Calaveras County Municipal Code (the "Code") section 17.06.0120, "Aggrieved party" means a person, organization, corporation, concerned citizen, or any individual or group which demonstrates to the appellant board that they have an interest, either financial or otherwise, in property affected by the decision of the original decision maker. Beginning in 2004, Joyce Techel, Carol Parks, and Don Kuhn were associated with a group of citizens with road impact concerns

who attended and commented at county meetings related to the review and eventual approval of the Olive Orchard Estates Subdivision. Joyce Techel also submitted written comments, documentation, and gave testimony at the August 13, 2015, Planning Commission MEP project hearing. Don Most and Lora Most live nearby and travel Olive Orchard Road regularly and are concerned that the agreed upon off-site road improvements for Olive Orchard Estates subdivision are proposed to be removed. Mr. Clyde Clapp is a building contractor and has lived in Calaveras county since the early 70s. He travels Olive Orchard Road frequently and he is concerned about the removal of needed improvements.

As such, all Appellants are aggrieved parties.

Supplemental Documentation. The Appellants reserve the right to submit supplemental information and supporting facts, law, and other documentation as soon as feasible after filing this appeal.

We, the undersigned, do not support granting the requested MEP and removing the offsite Olive Orchard Road improvements. We request you overrule the August 13, 2015, decision by the Planning Commission approving the MEP.

Respectfully submitted,

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Cc: Julie Moss-Lewis, Deputy County Counsel
Peter Maurer, Planning Director

September 3, 2015

Ms. Karen Osborn, Clerk of the Board of Supervisors
Honorable Cliff Edson, Chairman, and
Supervisors Ponte, Kearney, Oliveira, and Wright,
Calaveras County Board of Supervisors
891 Mountain Ranch Road
San Andreas, CA 95249-9709

VIA ELECTRONIC MAIL & HAND DELIVERY TO BOARD CLERK:

kosborn@co.calaveras.ca.us

Re: Supplement to Appeal of Planning Commission August 13, 2015, Action and Resolution 2015-017 approving a Modification to Existing Permit (MEP 2012-038) for the Olive Orchard Estates Subdivision (Project 2003-157) for Applicant Old Golden Oaks LLC—Ryan Voorhees and removing the requirement for certain off-site improvements to Olive Orchard Road

Dear Ms. Osborn and Calaveras County Board of Supervisors,

This letter **supplements** the August 27, 2015, filed Appeal from Joyce Techel, Carol Parks, Don Kuhn, Lora Most, Don Most, and Clyde Clapp (“Appellants”) of Planning Commission Resolution 2015-17 approving the 2012-038 MEP for Olive Orchard Estates, and allowing for removal of Olive Orchard Road CEQA Mitigation Measures XV-7. Appellants are submitting a Supplement to Appeal in order to state clear grounds why we are filing the appeal, and to provide supporting facts, law, and other documentation.

BACKGROUND

In 2003, the Olive Orchard Estates subdivision was proposed on what used to be a 256 acre olive orchard. There is also a very large reservoir, called Lake Beth, on the back side of this land. The project was approved in December 2004. While preparing the land for development, there were impacts to wildlife (CTS and Valley Elderberry Longhorn beetles). Elderberry bushes were moved and the land was fragmented to accommodate roads for the project, but... “This horse is already out of the barn!”

After four Planning Commission meetings in 2004 where many citizens commented about Olive Orchard Road impact concerns, and where no required Traffic Study was produced by the developer/applicant, Planning and Public Works Staff met with the applicant and developed a set of mitigating conditions for road impacts of the 47-lot subdivision project. The applicant agreed, **in writing**, to implement the required conditions for off-site improvements to Olive Orchard Road. With this written agreement in hand, the Planning Commission recommended approval of the

project and the citizens felt their concerns had been resolved. At that time we citizens still had faith in the system.

The Olive Orchard Estates project was approved by the Board of Supervisors on December 20, 2004. As reported, **“Since the development would add 500 vehicle trips per day to the road, Voorhees must widen and straighten about one mile of Olive Orchard Road from Highway 26 to his development. He will also have to build turn lanes on Highway 26 to access his project. All of these improvements, Voorhees figures, will cost him \$1 million. ” District 5 Supervisor Victoria Erickson said, “... I’m pleased to see we’re doing something with roads up front instead of in arrears”** (“Upscale Burson project moves forward”, December 22, 2004, Calaveras Enterprise).

On June 28, 2007, the project developer Ryan Voorhees entered into a Subdivision Agreement with Public Works to allow recordation of the final subdivision map **without completion of the required roadway improvements**. The first two houses were built in 2009. As of August, 2015, fourteen (14) houses have been built. Specified off-site improvements to Olive Orchard Road **have not been constructed and the applicant has what he wanted all along, his map.**

The applicant started making his move to have off-site road improvement conditions removed in 2010. Of course, the citizens were still under the impression that as the economy improved and houses were once again under construction, Olive Orchard Road would have the required improvements in place. **At this point we still felt a written agreement meant something, even though we had concerns based on the applicant’s history.**

APPLICANT HISTORY

There is a **troubling pattern of avoidance** with this applicant and his development projects. Following are examples from Gold Creek Estates, Hogan Oaks 1 and 2, and Olive Orchard Estates.

1. Applicant’s projects **Hogan Oaks I and 2 “were pulled off a Feb. (2004) Planning Commission meeting agenda to wait for the traffic study.”** “Olive Orchard Estates, a proposed 47 single-family home development off of Highway 26, was continued by the Planning Commission Thursday due to road impact concerns.” **“The commission directed the Public Works Department, Planning Department and the developer to get together to work on the road issues”** (“Valley Springs: 210 homes planned”, June 18, 2004, Calaveras Enterprise).
2. **“The project (Olive Orchard Estates) has the potential to generate 500 vehicle trips per day on Olive Orchard Road.** At 9 a.m. Thursday, the commission will consider the project (Olive Orchard Estates) but the **road issues have not been mitigated**, Public Works Deputy Director Tim McSorley said. **‘The developer wished to move forward and have some discussion without final resolution of the road issues’**, McSorley said” (“Valley Springs houses plan back on table”, September 15, 2004, Calaveras Enterprise).

3. “The federal **Environmental Protection Agency** has ordered **CRV Enterprises and Galt developer Ryan Voorhees to stop dumping dredged and fill material into Cosgrove Creek and surrounding wetlands near Valley Springs.**” “The agency inspected Gold Creek Estates off Highway 26 in June of 2004 at the request of the Army Corps of Engineers and found that the **development company had filled about 3 acres of creek and wetlands without permits from the Corps**” (“Feds order builder to restore wetlands”, February 15, 2005/ Calaveras Enterprise). **Voorhees was fined \$47,500 by the Environmental Protection Agency (EPA) “for dumping dredged and fill material without a permit** into Cosgrove Creek, its tributaries, and wetlands in the Calaveras River watershed in Valley Springs, a violation of the Clean Water Act” (US EPA Press Release, July 22, 2005).
4. “Just days after being cited by the U.S. Environmental Protection Agency, Gold Creek Estates developer **Ryan Voorhees has been issued a notice of violation from the state Water Quality Control Board for failing to properly manage storm water on site.**” “The water board’s Feb. 23 notice wasn’t the first one it has issued Voorhees” (“Troubles mount for Gold Creek developer”, March 14, 2005/ Calaveras Enterprise). Also from the above article, “**According to Voorhees, his other development, Olive Orchard Estates in Valley Springs, received a notice of violation for doing tree removal without a water permit. ‘We didn’t realize we were going to need a permit,’ he said.**”

On-going storm water discharge violations went uncorrected over several months. It took multiple site inspections and finally the **applicant was fined.** According to the California Regional Water Quality Control Board Administrative Civil Liability Order No. R5-2005-0120, **CRV Enterprises (the Discharger) was directed to pay a penalty of \$225,000.** The staff person working on this site was the Regional Board’s storm water construction coordinator and had inspected over a thousand construction sites in his career. **“The Gold Creek Estates property is one of the most significant problem sites in the 7 counties under his jurisdiction”** (Administrative Civil Liability Order No. R5-2005-0120, September 16, 2005). **Because of these kinds of abuses of storm water management, eventually Calaveras County, with a population nearing 50,000, was required to develop a Grading Ordinance before reaching the usual mandated 100,000 population threshold because of construction site storm water runoff which impacted creeks and streams.**
5. “An elderberry shrub growing next to Olive Orchard Road will be moved to a new home in a matter of days.if Voorhees transplants those four shrubs, he **must comply with all federal laws and get any necessary permits.** Voorhees and his attorney say that since there are no beetles living in the shrubs, **he doesn’t need any permit and will immediately move at least one plant out of harm’s way. Both county and federal officials are uneasy with Voorhees’ approach.**” “Voorhees said he trusts his attorney’s advice and that calling the Fish and Wildlife Service could delay his project for years” (“Shrub that supports beetle at center of flap,” Stockton Record/ February 17, 2006).

6. One of the **applicant's justifications** for removal of the Olive Orchard Road improvements included a **mistaken assumption that the County would have responsibility to prepare CEQA documents and obtain all necessary additional permits and entitlements for road construction** (Caltrans, Corps of Engineers, US Fish and Wildlife Service, CA Department of Fish and Wildlife). **This applicant is an established, experienced developer who knows exactly what he is doing. It is not credible that he would claim ignorance of such long established building requirements. He had a plan and he executed it.**

AGREEMENT AND CONDITIONS

Can developers treat project agreements like they are written on nothing more than toilet paper? How many projects in Calaveras County are going forward without mitigations being completed? Are there no repercussions from tearing up a signed agreement worth millions of dollars to the County? On August 13, two members of the Planning Commission **did not agree** with removal of the project agreement's Olive Orchard Road conditions. **"To me, the message ought to be that when you make a deal with the county in writing, and the community relies on it, you ought to uphold your end of it,"** said District 4 Commissioner Wooster. **"I feel there's an obligation to uphold that promise as well"** said District 2 Commissioner McLaughlin (from meeting video). **Both commissioners voted against the Modification to Existing Permit.**

The applicant agreed to his subdivision map Conditions in 2004 and did not contest or appeal conditions during any of the statutory appeal periods. He further agreed to the conditions in 2007 by posting a bond for the road improvements in order to get his subdivision map recorded. **By 1) agreeing in 2004, 2) not contesting in 2005, and 3) posting a bond in 2007 guaranteeing that the road work would be done, the assumption remained that road improvements were necessary to offset project impacts, and that the applicant intended to do the road improvements he agreed to in 2004.**

At the August 13 Planning Commission meeting about removing road improvement mitigation measures, Commissioner Wooster asked, **"What is the benefit to the County and residents if the applicant complied? What is the benefit that would be lost?"** At the time, *County staff did not know the answer to his question*, so the answer wasn't taken into consideration in the MEP decision. Since then, we have done the math, based on published estimated capital project costs in the Valley Springs Benefit Program. **The benefit that would be lost to the County and the public by removing the applicant's written agreement to install left-turn lanes on Hwy. 26 and improve a portion of Olive Orchard Road could exceed \$3.5 million.**

The Olive Orchard Road improvements conditioned in 2004 are not a NEW mitigation measure, so the current traffic study does not legally affect these road conditions. **Existing Conditions may**

remain in place—this is a discretionary decision. There was a clearly identified nexus to assumed road impacts when the map was approved in 2004, as a “potential to generate 500 vehicle trips a day.” The applicant agreed to these conditions in lieu of doing a Traffic Impact Study in 2004. Predicted impacts may or may not be less than anticipated, but clearly the mitigation need is incremental for increases in traffic from the subdivision. And clearly there is a substantial monetary benefit to the County and the public that will be lost if agreed-to road conditions are removed. Conditions may not be deemed “required” under the new Traffic Study, but the existing conditions are certainly beneficial and desirable. These and *other reasons* can be the basis for a decision to leave conditions in place. The Board of Supervisors has the discretion and full authority to recommend approval or denial of the MEP request. The County may continue to impose the existing, agreed-to, Olive Orchard Road improvement conditions.

OLIVE ORCHARD ROAD

A. SERVICE LEVEL (LOS) AND SAFETY

The applicant and traffic study is justifying no road improvements on the premise that Olive Orchard Road is designated a Level of Service (LOS) B. Residents that use Olive Orchard Road don’t agree with this “good grade”, and the 2012 KD Anderson LOS Study **shows Level of Service C in Table 2** in for all peak hours based on volume. **The reliance on various LOS standards is problematic, and there are safety concerns.** Physical conditions of the road are important. In the 2015 LSC Traffic Study, it states, “No roadway LOS mitigation measures are necessary under 2014 or 2035 conditions. **Note that the adequacy of the existing roadway cross-section was not evaluated as a part of this.” The existing roadway cross-section should have been evaluated--it is inadequate and dangerous.** In the 2012 KD Anderson letter to the applicant it states, “The roadway has graveled shoulders that range from 1 to 2 feet.” **This is not correct. From the project to Highway 26, short portions have gravel 1 to 2 feet, but the majority of that section of road has ditches, areas with a six-inch-drop-off, and banks on one or both sides of the road.** If an emergency vehicle were to approach that road during a call, and they encountered multiple vehicles, the only option would be for the passenger vehicles to stop and the emergency vehicle would have to “snake” through the vehicles as there is no way for cars to pull off the road. Olive Orchard Road is narrow, has ditches or steep banks immediately off the road pavement, lacks shoulders and pull-outs, and has blind curves and hills. **At the Planning Commission meeting August 13, District 5 Commissioner Tunno said Olive Orchard Road “is really dangerous.”** From the article “Valley Springs: 210 homes planned”(June 18,2004/Calaveras Enterprise), **“The road (Olive Orchard Road) is not being kept up at Level B,** said Tim McSorley, **public works deputy director.”** The road was resurfaced and the lines were repainted, but the road remains as it has been for years, a vital but dangerous connector road. **The addition of over 500 trips a day from the Olive Orchard Estates project warrants road improvements “up front” to mitigate impacts and increase safety.**

B. EVACUATION ROUTE

Olive Orchard Road is used heavily by locals, especially Rancho Calaveras residents, to travel from Hwy. 26 to Hwy. 12 via Olive Orchard Road to Burson Road to Southworth Road to Pettinger Road to Hwy 12. This route is shorter and allows them to avoid the serious bottleneck at the 12/26 intersection in Valley Springs. Olive Orchard Road is also a key evacuation route in the event the 12/26 intersection is blocked during an emergency (as happened during the Pattison Fire). There are many proposed projects at various stages of the development process located in the general area and when built out can be expected to substantially increase the traffic burden on most roads in the area, but definitely on Olive Orchard Road. (See attached 2011 Calaveras County map of Subdivision and Parcel Splits in the Valley Springs Area with this alternative route noted.) We are concerned that cumulative impacts for this road have not been adequately addressed. Members of the Public have requested that cumulative impacts be addressed on almost every subdivision project for the last 10+ years.

C. VALLEY SPRINGS BENEFIT BASIN & DEVELOPMENT IMPACTS

Olive Orchard Road improvements are a Capital Project in the Valley Springs Benefit Basin (VSBB) road impacts fee program. The VSBB mitigation program was established October 2004 (using 2001 RTP road project costs) but has not been updated since then. The VSBB program requires regular review and adjustment in fees, project lists, and project costs, but **fees have stayed the same for 11 years, the approved projects list has not been reviewed annually as required, and capital projects costs have not been updated for 11 years.** Are development projects like Olive Orchard Estates really being adequately mitigated by road fees paid into the 2004 Valley Springs Benefit Basin Program? The 2004 VSBB Capital Projects cost estimate for the “Olive Orchard Road/Hwy 26 Left-turn Pocket” is over \$1 million. The “Western Connector” Project, a 6-mile long road improvement project which includes Olive Orchard Road, costs nearly \$13 million. The section of Olive Orchard which was to have been improved by the applicant, Ryan Voorhees, is over a mile long, and would have contributed millions of dollars to needed Olive Orchard Road improvements in the VSBB. The 2004 VSBB fee for a single-family home is still **only \$1,275.** At full buildout, the 47 Olive Orchard Estates homes will only pay \$59,925 into the Benefit Basin for road impacts. How is this mitigating the impacts of over 500 new vehicle trips a day on Olive Orchard Road? At this rate, there will never be adequate funds in the out-of-date VS Benefit Basin to improve Olive Orchard Road or its intersection with Hwy. 26. **Road impacts need to be directly paid for by the developer causing the impacts, as promised in 2004.**



So, let’s see if we have this right. Calaveras County isn’t effectively addressing cumulative impacts, or enforcing mitigation measures, or ensuring that adequate RIM and Benefit Basin fees address the growing traffic impacts from development. **Calaveras County is allowing itself to be gamed and manipulated by some developers to the detriment of County residents and property owners.**

The applicant has several other projects in the Valley Springs area that are in various stages of the development process (Hogan Oaks I and 2, Charboneau Estates, and Old Golden Oaks). **All of these projects require road improvements to proceed.** After watching the applicant's Olive Orchard Estates project traffic mitigations being removed, **why should the public believe these next projects, or any projects, will complete necessary, extensive road mitigation measures?**

LEGAL STANDARD TO ELIMINATE A MITIGATION MEASURE

The proposal is to completely eliminate traffic mitigation measures. Such a decision must be supported by substantial evidence and an adopted Statement of Overriding Considerations. What is the substantial evidence of conditions that have changed?

1) *"The applicant asserted that the County's pavement overlay was a change in circumstances that made Mitigation Measure XV-7 (1) and (2) no longer appropriate or necessary."* **But resurfacing an existing bad road is not the same as "constructing" a new road "in compliance with County road Template D."** **A pavement overlay does not make a "left turn lane" intersection improvement unnecessary.** The Mitigation Measures are:

*XV-7: 1. **Olive Orchard Road is to be constructed** from the easterly boundary of the project to State Highway 26 **in compliance with Template D. Structural section for the road is to be based on a Traffic Index of 6.0 and the R-value of the soil with a minimum of 2" A. C. over 6" Class 2 A.B.; and***

*XV-7: 2. **Construct a left turn lane at the intersection of Olive Orchard Road and State Highway 26 in compliance with Caltrans standards.** (a) Provide Public Works with copies of Caltrans permits, recommendations and approvals as a part of the improvement plan review and approval.*

This minor change in circumstances does not warrant removal of the Mitigation Measures.

2) Does the April 2015 Traffic Study state something different than was known when the mitigation measures were imposed? Back in 2004, **Public Works estimated 500 additional trips a day would be generated by the project.** The 2015 Traffic Study estimates project trip generation as, **"524 one-way vehicle trips over the course of an average weekday."** This is no big difference and is not substantial new evidence.

Traffic impacts still exist. There was no prior traffic study. There is nothing new, no new facts or evidence that could not have been known and was not known in 2004. Delaying the traffic study does not create new facts. There will still be the same number of trips. What is being requested is to reverse, without new evidence, a mitigation measure agreed to by all parties. This is not a case where a new traffic study was done showing a prior traffic study was inaccurate. It is not a case where conditions have changed. It is a case where a mitigation measure was approved and a traffic study required. The prior mitigation measure was not conditioned on a certain level of traffic

determined by the traffic study, as it could have been. **This is merely a developer delaying a traffic study, which is in itself a failure to timely implement a mitigation measure, and using that delay as an excuse not to perform the actual on the ground traffic improvements. The impacts are the same as when the mitigation measure was adopted, only now we have a study.** The facts do not support the need for substantial evidence.

3) *"The applicant has also argued that the 2003/2004 environmental document did not identify the need for the mitigating condition, and that there was no proper CEQA nexus to allow the legal placement of the mitigating condition on the project."* That is not new evidence but just a legal challenge or appeal of the decision made in 2003/2004. **The nexus argument is a legal argument he should have made in 2003/2004 and the time to legally challenge that is long past.**

4) *"The applicant stated that site acquisition for the added right of way would be difficult to obtain and that significant environmental damage would occur as a result of constructing the required road improvements."* **All this is saying is that the mitigation required is going to be expensive. So what? That's not new evidence making the mitigation unnecessary.** Every developer could come along and argue 10 years later the mitigation is more expensive.

Mitigation measures adopted when a project is approved may be modified or deleted if the agency gives a legitimate reason for making the change and supports those reasons **with substantial evidence.** [Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors \(2001\) 91 CA4th 342](#), 359. An agency may cancel a mitigation measure without reviewing the continuing need for it, stating its reasons for the change, **and supporting its decision with substantial evidence.** [Katzeff v Department of Forestry & Fire Protection \(2010\) 181 CA4th 601](#), 614. The reasons for deleting the mitigation measure and the effect of doing so must be addressed in a supplemental EIR or other CEQA document such as an addendum. See [Lincoln Place Tenants Ass'n v City of Los Angeles \(2005\) 130 CA4th 1491](#), 1508. **Where is the substantial evidence here? There is none. There is not a substantial change in the traffic generated in this project since it was approved. There is no matching of two traffic studies to show a prior study overstated traffic impacts. This is merely a developer asking for reconsideration of a decision made over 10 years ago unsupported by an evidence to justify the change.** The Planning Commission and Board of Supervisors is not allowed to just change its mind without substantial evidence of some changed circumstances, not just the delaying of a traffic study that should have been done over 10 years ago.

An agency may not eliminate a mitigation measure that has previously been adopted for a significant environmental effect unless it finds that the measure is infeasible and adopts a statement of overriding considerations finding that the benefits of the project outweigh its unmitigated significant effects on the environment. *Napa Citizens for Honest Gov't*, 91 CA4th at 359. Here there is no argument that the road improvements are infeasible, therefore a statement of overriding considerations must be adopted. That statement must conclude that because of the project's overriding benefits, it is approving the project despite its environmental harm. 14 Cal Code Regs §15043. The agency must set forth the reasons for its action, in this case the elimination of mitigation measures, based on the final EIR or other information in the record. [Pub Res C §21081\(b\)](#);

14 Cal Code Regs §15093(a). There was no adoption of any Statement of Overriding Considerations and this is fatal to the Planning Commission decision.

To set aside a mitigation measure, the burden is on the County to show that new mitigation completely eliminates the need for the old. If the Board of Supervisors approves the MEP, the County will be giving away improvements due now. The TIS is just a way to appeal an agreement made 10 years ago.

Please give us reason to believe needed road improvements will actually be completed when agreements are signed. We ask that you deny the application for Modification to Existing Permit for Olive Orchard Estates.

Respectfully submitted,

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Cc: Julie Moss-Lewis, Deputy County Counsel
Peter Maurer, Planning Director

Attachments

- Feds order builder to restore wetlands_CE_02_15_05.doc

- R5-2005-0120.pdf
- Shrub that supports beetle at center of flap_SR_02_06.doc
- Troubles mount for Gold Creek developer_CE_03_14_05.doc
- Upscale Burson project moves forward_CE_12_22_04.doc
- US_EPA fines Galt developer \$47,500_EPA PR__07_22_05.doc
- Valley Springs 210 homes planned_CE_06_18_04.doc
- Valley Springs houses plan back on table_CE_09_15_04.doc
- Planning Projects Northwest Calaveras Co_05_2011_Western Connector-half.jpg