



March 14, 2023

Robert Williams, Secretary
El Dorado Hills Area Planning Advisory Committee
1021 Harvard Way
El Dorado Hills, CA 95762

**RE: Responses to Technical Advisory Committee Questions from EDH APAC
Project Frontier (CUP22-0016)**

Dear Mr. Williams and EDH APAC Officers:

As the applicant of Project Frontier (CUP22-0016) (“project”), we received a copy of the questions El Dorado Hills Area Planning Advisory Committee (“EDH APAC”) submitted to the El Dorado County (“County”) Planning Department for the Technical Advisory Committee meeting for the project. We appreciated the opportunity to discuss the project with EDH APAC Officers on January 27, 2023 and are looking forward to providing a project presentation at EDH APAC’s monthly meeting on March 15, 2023 as part of our outreach efforts within the El Dorado Hills community. We look forward to highlighting many of the benefits of the project for the El Dorado Hills community and greater County, including a substantial increase in property and sales tax revenue and significant new employment opportunities. We are excited to advance a project that is consistent with the long-standing zoning and that will produce significantly less traffic than has been assumed and analyzed for the project site. In our continued commitment to transparency, please find answers to EDH APAC’s questions below. For ease of reference, we included the question from EDH APAC in blue text and the response below each question. Additional information about the project is available at www.projectfrontierinfo.com.

Question 1

1. EDH APAC members have concerns regarding ministerial approval of the proposed project based on its immense scale and potential of significant impacts in the El Dorado Hills Community. EDH APAC members are concerned about any effort to designate the process as ministerial approval. A program that significantly transforms a segment of El Dorado Hills requires review and approval by the Planning Commission and the EDC Board of Supervisors. EDH APAC believes that public review and input is required with the level of transparency afforded by public hearings where EDC departmental officials can disclose recommendations and the applicant can present its proposal in the light of day.

Answer to Question 1:

The project applicant is not seeking ministerial approval. The project applicant has applied for a conditional use permit to allow one of the buildings to exceed current height limits. A conditional use permit is a discretionary approval and the El Dorado County Zoning Code (“Zoning Code”) requires a noticed public meeting for a conditional use permit. Section 130.52.021 provides for the Zoning Administrator or Planning Commission to be the review authority for a conditional use permit, and “[t]he determination of the review authority shall be made by the Director based on the nature of the application, and the policy issues raised by the project.”

A conditional use permit is not required to allow the project uses. The Matrix of Allowed Uses in Table 130.23.020 of the County Zoning Code provides that “Wholesale Storage and Distribution,” the same use as the proposed project, is an allowed use in the Research and Development Zone. A local agency cannot selectively or arbitrarily require a discretionary approval for uses that the Zoning Code allows by right with a ministerial building permit approval.

The applicant understands that, because the proposed project uses are consistent with zoning, are allowed by right, and have been previously analyzed in numerous environmental analyses, the Planning Department has determined that the Zoning Administrator is the appropriate decision-making body for the conditional use permit that is limited to the proposed building height.

Question 2

2. The applicants have made known their desire to minimize impacts to private school functions inside the El Dorado Hills Business Park. While appreciated, EDH APAC also recognizes that the El Dorado Union High School District owns approximately 200 acres of property on the south side of Wetsel-Oviatt Road for a future High School site immediately adjacent to the proposed project. What mitigation measures might be appropriate in light of the proximity of the future High school Site?

Answer to Question 2:

The applicant understands El Dorado Union High School District owns an approximately 215-acre site to the south of the project site. The 2018 Master Plan for the El Dorado Union High School District does not identify a planned new high school at this location. Based on enrollment and growth projections in that Master Plan, the El Dorado Union High School District did not anticipate needing to begin planning for a potential new school site before 2028. While the applicant is not aware of new school plans to consider, the northern portion of the El Dorado Union High School District’s parcel includes Wetsel-Oviatt Road, which provides access to an existing trucking facility. If the El Dorado Union High School District decides at some point in the future to construct a school at this

location, it is assumed the school would be south of Wetsel-Oviatt Road, which would place the school more than 1,000 feet from the project. The project site has also been zoned Research and Development since the 1980s. The project Acoustical Analyses - Sound Study also considered the existing school to the north of the project site and determined that any noise from the project would not impact that sensitive receptor. A potential school on the El Dorado Union High School District parcel would be approximately the same distance from the project as the existing school and the project would not have noise impacts on a potential new school at the El Dorado Union High School District parcel. While the project does not include housing and therefore will not increase the demands on schools, the County estimates that the project will pay approximately \$3.1 million in school district fees.

Question 3

3. The Project Application Packet indicates square footage of the two buildings that is significantly larger than the project marketing website, or what has been discussed in published news reports:

Application: Building 1 5-story distribution & sortation building (- +/- 2,800,000 SF) Application: Building 2 1-story distribution & sortation building w/mezzanine (+/1,330,820 SF)

Application Total - 4,130,820 SF

Project Marketing Website (projectfrontierinfo.com): “will include two buildings with a *total footprint of about 1.7 million square feet*”

The TAC meeting Initial Consultation Letter (Revised) indicates a third number - 4,818,210 SF

- 3.1. So what is the actual proposed size of the buildings?

Answer to Question 3.1:

One important difference is between the project footprint, which is the area directly impacted by a project or activity, and the total building square footage, which includes mezzanines, all levels, and non-occupiable and unmanned areas. Other differences likely result from minor revisions to plans as they have been refined. The precise building square footages provided to the County based on the most current plans are as follows:

| PROJECT FRONTIER - SQUARE FOOTAGES | |
|------------------------------------|---------------------|
| BUILDING 1 | |
| FOOTPRINT | 650,639 SF |
| <i>GROUND LEVEL</i> | |
| OFFICE | 42,981 SF |
| WAREHOUSE | 607,658 SF |
| <i>MEZZANINE LEVEL</i> | |
| WAREHOUSE | 62,468 SF |
| NON-OCCUPIABLE/UNMANNED | 287,824 SF |
| <i>LEVEL 2</i> | |
| WAREHOUSE | 125,672 SF |
| NON-OCCUPIABLE/UNMANNED | 476,695 SF |
| <i>LEVEL 3</i> | |
| WAREHOUSE | 125,672 SF |
| NON-OCCUPIABLE/UNMANNED | 476,695 SF |
| <i>LEVEL 4</i> | |
| WAREHOUSE | 125,672 SF |
| NON-OCCUPIABLE/UNMANNED | 476,695 SF |
| <i>LEVEL 5</i> | |
| WAREHOUSE | 125,672 SF |
| NON-OCCUPIABLE/UNMANNED | 476,695 SF |
| TOTAL WAREHOUSE/OFFICE | 3,410,399 SF |
| PRIMARY GUARD HOUSE | 278 SF |
| SECONDARY GUARD HOUSE | 166 SF |
| PUMP HOUSE 1 | 1,276 SF |
| PUMP HOUSE 2 | 1,276 SF |
| LONG-TERM BIKE SHELTER | 943 SF |
| TOTAL SQ FT | 3,414,338 SF |

| | |
|--|---------------------|
| BUILDING 2 | |
| FOOTPRINT | 1,085,621 SF |
| OFFICE | 41,807 SF |
| WAREHOUSE | 1,043,814 SF |
| MEZZANINE | 280,425 SF |
| TOTAL WAREHOUSE/OFFICE | 1,366,046 SF |
| PRIMARY GUARD HOUSE | 278 SF |
| SECONDARY GUARD HOUSE | 148 SF |
| PUMP HOUSE | 1,641 SF |
| LONG-TERM BIKE SHELTER | 943 SF |
| TOTAL SQ FT | 1,369,056 SF |
| TOTAL PROJECT SQUARE FOOTAGE 4,783,394 SF | |
| (BOTH BUILDINGS AND ACCESSORY BUILDINGS) | |

Question 4

4. Entitlements stem from which environmental review/approvals?
 - 4.1. The original El Dorado Hills Business Park circa 1980s?
 - 4.2. The 2004 Voter Approved El Dorado County General Plan?
 - 4.3. The 2015 TGPA/ZOU?

Answers to Question 4.1 to 4.3:

The entitlements for the project use are based on the Research and Development (“R&D”) zoning. The site was rezoned in the early 1980s from Exclusive Agriculture to Research and Development to create an “industrial business park.” The rezone was analyzed in the 1982 El Dorado Hills Business Park Environmental Impact Report (State Clearinghouse No. 1982070503). The project site has thus had R&D zoning since the early 1980s and “Wholesale Storage and Distribution” is an allowed use in the R&D Zone.

With the certification of the El Dorado Hills Business Park Environmental Impact Report, the EDH Business Park was approved and anticipated to build out over time. The County thus assumed development on the project site with zoning-consistent uses and analyzed it that way when adopting the 2004 General Plan, which was analyzed in the 2003 El Dorado County General Plan Environmental Impact Report (“General Plan EIR”) (State Clearinghouse No. 2001082030).

Buildout of the project parcel was also assumed and analyzed in the subsequent amendments to the 2004 General Plan, including:

- 2015 El Dorado County Targeted General Plan Amendment and Zoning Ordinance Update Final Program Environmental Impact Report (“TGPA-ZOU EIR”) (State Clearinghouse No. 2012052074); and
- 2017 Biological Resources Policy Update and Oak Resources Management Plan Environmental Impact Report (“Biological Resources EIR”) (State Clearinghouse No. 2012052074).

Development of the EDH Business Park, including the project site, was assumed in those EIRs, and the proposed project is consistent with the zoning, General Plan policies, and analyses in those EIRs.

Question 5

5. Have there been significant environmental changes since the environmental review(s) completed in 1980, 2004, or 2015?
 - 5.1. Do Environmental findings from the recent HELIX Environment Survey for the Carson Creek Preserve have any impacts or significant changes on the Environmental Analysis of the El Dorado Hills Business Park or the project site and its entitlements (since de-annexed from the El Dorado Hills Business Park)?
 - 5.2. Is there a potential negative impact from the project site’s creek drainage into the Carson Creek Preserve (owned by the Heritage HOA and overseen by the US Corp of Engineers and CAL Dept of Fish/Wildlife). There is 3300 feet between the two locations and the Project Frontier documents state "all features in the study area eventually drain into Carson Creek."
 - 5.3. Differences in sightings of federal and state species of concern including migratory birds are reported in the two reports.

Answer to Questions 5.1 to 5.3:

An environmental consultant is currently preparing a comprehensive California Environmental Quality Act (“CEQA”) consistency analysis under Public Resources Code Section 21083.3 and CEQA Guidelines section 15183 and, alternatively section 15168, that examines the prior environmental review with which the project is consistent and ensures that there is no substantial new information that was not known when the prior environmental documents were certified. The consistency analysis is currently being finalized and the County will independently review the consistency analysis to make its independent determination. The consistency analysis will also be available to the public.

The consistency analysis considers and relies on numerous project-specific studies that consider current conditions to ensure there is no new information that was not known when the prior EIRs were certified. These studies available to the public include:

- *Acoustical Analyses - Sound Study*, Ostergaard Acoustical Associates (July 15, 2022).
- *Aquatic Resources Delineation Report*, ESA (November 2021).
- *Biological Resources Technical Report*, ESA (January 2023).
- *Botanical Survey Results*, ESA (June 10, 2022).
- *Fault Rupture Hazard Evaluation*, Youngdahl Consulting Group, Inc. (August 19, 2021).
- *Geotechnical Engineering Feasibility Study*, Youngdahl Consulting Group, Inc. (August 18, 2021).
- *Oak Resources Technical Report*, Foothill Associates (January 4, 2019).
- *Phase I Environmental Assessment*, Youngdahl Consulting Group, Inc. (August 31, 2021).
- *Supplemental Tree Survey Results*, ESA (September 14, 2022).
- *Transportation Impact Analysis Report*, Fehr & Peers (November 2022).

5.1. The Project Frontier Biological Resources Technical Report (“Biological Report”) reflects the current regulatory and ecological settings of the project site and the environmental consultant has determined there are no new impact types from those considered in the General Plan EIR, TGPA-ZOU EIR, and Biological Resources EIR. The Biological Report includes minor variations in biological resources covered that stem from special-status species regulatory status changes and/or differences in potential for occurrence (based on site-specific habitat features and cumulatively current occurrence records), but these changes from the prior EIRs are not new or substantive. Further, the Biological Report identifies universally applied development standards and mitigation adopted in the prior EIRs. It is anticipated that the project will be required to comply with these universally applied development standards and mitigation adopted in the prior EIRs.

5.2. The 1996 Carson Creek Specific Plan (“CCSP”) EIR included creating the Carson Creek Preserve within the open space parcels outlined in the plan. “The Carson Creek Preserve was established as a requirement of the permits issued to authorize impacts to jurisdictional aquatic resources in order to ensure no net loss of those resources.” (CCSP EIR Addendum May 2021.) As indicated in the Biological Report, one bridge from Latrobe Road and an internal road for primary access will be constructed. The access road was required as a condition of approval for the Heritage at Carson Creek Tentative Subdivision Map and analyzed in the CCSP EIR Addendum in May 2021.

The bridge would extend the existing culvert from Latrobe Road for the width of the proposed bridge. Construction of the northern access road would entail earthwork to construct an earthen prism and associated stormwater infrastructure (curbs and gutters, five culverts, associated stabilized outfalls, and basins).

The Biological Report indicates that any earthwork in the vicinity of streams or water features has the potential to significantly impact water quality in those features. If the avoidance and mitigation measures below are implemented, the project would not have a significant impact to offsite open space, streams, or waters (e.g., portions of the Carson Creek Preserve):

- Stormwater protection mitigation measures (per County Ordinance Section 130.30.050(G)(1)).
- General Plan Policies 7.3.3.4, 7.4.2.5, and 7.4.2.8.
- Compensatory mitigation measure (General Plan Policy 7.4.2.8; consistent with General Plan EIR Mitigation Measure 5.12-1(d) (“Develop and Implement an Integrated Natural Resources Management Plan”) and General Plan EIR Mitigation Measure 5.12-1(e) (“Adopt a No-Net Loss Policy and Mitigation Program for Important Habitat”).

The question notes that the Carson Creek Preserve is located approximately 3,300 feet downstream of the project. By implementing universally applied development standards of avoidance and minimization noted above, the project would not result in offsite impacts to open space, streams, or waters (e.g., the Carson Creek Preserve).

5.3. The difference between protected bird species is primarily due to changes in species’ regulatory statuses between the times when the reports were prepared. All current special-status bird species and species with protected nests are considered in the Biological Report, including additional species not previously considered (e.g., grasshopper sparrow) due to recent regulatory status changes. Bird sightings are specific to local conditions (e.g., climate, season) and individual movement patterns, so the differences in the bird species observed during survey efforts conducted at different times and locations naturally vary. Based on the information above, protected bird species and nests are fully considered and are in accordance with General Plan Policy 7.4.2.8(C). The project applicant anticipates avoidance and minimization conditions will be required consistent with this universally applied development standard.

Question 6

6. Traffic Generation:
 - 6.1. 155 loading docks: how many daily truck trips? Tractor Trailer/Straight Truck? Parcel Van?
 - 6.2. 892 trailer spaces: how often will trailers arrive at the facilities? Leave the facilities?
 - 6.3. 2910 parking spaces: Daily trips for employees?
 - 6.4. What percentage of Fulfillment services vehicle traffic generation will be new to El Dorado Hills? That is - trips in excess of existing fulfillment travel that come into El Dorado Hills, compared to the amount of traffic generation for fulfillment trips to other parts of El Dorado County, Amador County, Folsom, Rancho Cordova, and eastern Sacramento County that will be generated from El Dorado Hills? Fulfillment trips that will impact all roads in El Dorado Hills, and not just the major surface connectors and US50.

Answer to Questions 6.1 to 6.4:

6.1: As indicated in the Transportation Impact Analysis Report for the project, daily truck trips are 1,250. The applicant understands the Transportation Impact Analysis is currently under independent peer review by the County.

6.2: Project trucks would generally enter from the first signalized intersection at Royal Oaks Drive and exit from the fourth access at the southern corner that would also be signalized. Please see response 6.1 as to daily trips.

6.3: The Transportation Impact Analysis Report estimates 3,808 daily passenger trips, which would be the employee trips.

6.4: The project will generate approximately 80% less daily trips than assumed and analyzed for the parcel in the General Plan EIR. Specifically, the Transportation Impact Analysis Report identifies 5,058 daily auto and truck trips compared to the anticipated and analyzed 23,540 daily trips in the General Plan EIR at buildout. If the project is approved, it will fill a need in the region and the addition of the facility will likely reduce vehicles miles traveled ("VMT") for distribution within the region.

Question 7

7. Impacts on LOS at:
 - 7.1. US50 at EDH Blvd/LatrobeRd interchange
 - 7.2. Latrobe Rd - Town Center Blvd intersection
 - 7.3. Latrobe Rd - White Rock Rd intersection
 - 7.4. Latrobe Rd - Monte Verde Dr/Golden Foothill Pkwy (north) intersection

- 7.5. Latrobe Rd - Suncast Lane intersection
- 7.6. Latrobe Rd - Clubview Dr/Golden Foothill Parkway (south) intersection
- 7.7. Latrobe Rd - Larkstone Place intersection
- 7.8. Latrobe Rd - Investment Blvd intersection
- 7.9. Latrobe Rd - Royal Oaks Dr intersection
- 7.10. Latrobe Rd - Wetsel-Oviatt Rd intersection
- 7.11. US50 at Silva Valley Pkwy/White Rock Rd interchange
- 7.12. White Rock Rd - Clarksville Crossing intersection
- 7.13. White Rock Rd - Vine Street/Valley View Pkwy intersection
- 7.14. White Rock Rd - Keagles Ln intersection
- 7.15. White Rock Rd - Monte Verde intersection
- 7.16. White Rock Rd - Post Street intersection
- 7.17. White Rock Rd - Manchester Dr intersection
- 7.18. White Rock Rd - Bailey Circle intersection
- 7.19. White Rock Rd - Stone Briar Dr/4-Season Dr intersection
- 7.20. White Rock Rd - Florentino Dr intersection
- 7.21. White Rock Rd - Tera Alta Dr/Carson Crossing Rd intersection

Answer to Questions 7.1 to 7.21:

The following table summarizes the intersection analysis locations studied in the Transportation Impact Analysis Report. The locations were identified in coordination with County Department of Transportation. Where specific minor roadway intersection analysis was not conducted, the roadway segments of the major street were included in the Transportation Impact Analysis Report.

| Facility (Interchange or Intersections) | Note |
|--|---|
| US50/EDH Blvd/Latrobe Rd | Analyzed |
| Latrobe Rd/Town Center Blvd | Analyzed |
| Latrobe Rd/White Rock Rd | Analyzed |
| Latrobe Rd/Monte Verde Dr/Golden Foothill Pkwy (N) | Analyzed |
| Latrobe Rd/Suncast Ln | Analyzed |
| Latrobe Rd/Clubview Dr/Golden Foothill Pkwy (S) | Analyzed |
| Latrobe Rd/Larkstone Pl | Not Analyzed (Minor right-in/right-out Intersection) |
| Latrobe Rd/Investment Blvd | Analyzed |
| Latrobe Rd/Royal Oaks Dr | Analyzed |
| Latrobe Rd/Wetsel-Oviatt Rd | Not Analyzed (Minor private road) |
| US50/Silva Valley Pkwy/White Rock Rd | Analyzed |
| White Rock Rd/Clarksville Crossing | Analyzed |
| White Rock Rd/Vine St/Valley View Pkwy | Analyzed |
| White Rock Rd/Keagles Ln | Not Analyzed (minor private road/driveway intersection) |
| White Rock Rd/Monte Verde | Not Analyzed (minor road intersection) |
| White Rock Rd/Post Street | Analyzed |
| White Rock Rd/Manchester Dr | Not Analyzed (minor road intersection) |
| White Rock Rd/Bailey Circle | Not Analyzed (minor road intersection) |
| White Rock Rd/Stone Briar Dr/4-Season Dr | Not Analyzed (minor road intersection) |
| White Rock Rd/Florentino Dr | Not Analyzed (minor road intersection) |
| White Rock Rd/Tera Alta Dr/Carson Crossing Rd | Analyzed |

Question 8

8. Is Vehicle Miles Traveled (VMT) a required consideration/metric in the Traffic Impact Analysis as a new project? If not required, can a VMT analysis be completed that would inform the community and decision makers on the project's impact in regards to the County's VMT formula?
 - 8.1. VMT became a standard/metric in CEQA analysis in July 2020, and other area projects proposed and approved in El Dorado Hills prior to the CEQA VMT implementation have provided VMT analysis.

Answer to Question 8:

While VMT was not yet the threshold by which CEQA required transportation impacts to be analyzed, the General Plan EIR and TGPA-ZOU EIR analyzed regional transportation performance under General Plan buildout conditions, including modeled analysis of daily vehicle trips, daily VMT, and daily vehicle hours of delay. The General Plan EIR specifically anticipated the increased VMT at buildout of the EDH Business Park so impacts to VMT from buildout, including the EDH Business Park, were previously analyzed.

The project will also produce substantially fewer daily trips than were analyzed for the project site in the General Plan EIR, as explained in the Transportation Impact Analysis Report on pages 46 to 48. It is the project applicant's general understanding that unrelated projects that have elected to perform a VMT analysis were preparing a new EIR.

Question 9

9. EDH APAC members in our initial look at the scope of the project are concerned about the potential environmental impacts to the Carson Creek Preserve.

Answer to Question 9:

Please see the response to question 5.2 above.

Question 10

10. EDH APAC members have concerns that the environmental reviews performed for the initial El Dorado Hills Business Park entitlements/approvals are four decades old. Additional analysis should be performed to validate that the new project proposal is compliant with current CEQA requirements - it is entirely possible that 40 year old environmental standards and analysis methodologies may be inadequate in 2023. A basic MND may be inadequate in light of the scope

of the proposed project, and its potential impacts on El Dorado Hills, and specifically the El Dorado Hills communities south of US50.

Answer to Question 10:

The project does not rely primarily or exclusively on the environmental analysis from the EDH Business Park EIR. The CEQA consistency analysis relies on more recent environmental review with the General Plan EIR, TGPA-ZOU EIR, and Biological Resources EIR.

Question 11

11. EDH APAC members have concerns about the initial noise study. A more rigorous analysis should be conducted to ensure that the project adheres to County noise ordinances, and avoids impacts to not only the residential communities adjacent to the project, but also to the business uses in the El Dorado Hills Business Park, including schools, churches, and other uses.

Answer to Question 11:

The Acoustical Analyses - Sound Study (“Acoustical Analyses”) used three-dimension acoustical modeling software to predict a worst-case scenario at nearby sensitive receptors. The Acoustical Analyses recognized features of project design that will reduce noise, including placement of truck bays behind the buildings to provide the greatest buffers and noise reduction from nearby sensitive receptors. The Acoustical Analyses concluded that the maximum, worst-case sound emissions at nearby sensitive receptors would comply with the County standards.

Question 12

12. EDH APAC members have concerns about impacts to utility infrastructure.
- 12.1. Does the project envision undergrounding electrical service? Will this necessitate additional road construction work to the project to deliver the additional electrical service?
 - 12.2. Does the project envision photovoltaic solar infrastructure at the project site?
 - 12.3. Will vehicle usage at the project site utilize EV/Hybrid vehicles, or material handling equipment?
 - 12.4. Does PG&E have adequate electrical transmission infrastructure in the area?
 - 12.5. Does the project envision natural gas utilities being provided to the project? Will this necessitate additional road construction work to the project?

- 12.6. Does the project envision building out additional fiber/data connectivity to the site? Will this necessitate additional road construction work to the project?

Answers to Questions 12.1 to 12.6:

- 12.1. The project will have underground electrical service that will be achieved with traditional development procedures and universally applied standards.
- 12.2. The project buildings are designed to carry the weight of solar panels.
- 12.3. The project will comply with all state requirements addressing EV standards.
- 12.4. The project applicant is coordinating with PG&E and understands that there is adequate electrical transmission infrastructure in the area.
- 12.5. The project anticipates natural gas utilities consistent with the EDH Business Park.
- 12.6. The project anticipates fiber/data connectivity consistent with the EDH Business Park.

Question 13

13. EDH APAC members believe that the proposed additional travel lanes on north and southbound Latrobe Road should be completed prior to the project's full opening/daily activities.

Answer to Question 13:

County General Plan Policy TC-Xf requires that a project be conditioned to construct the improvements or that the improvement be included in the County's 20-year CIP. For Latrobe Rd. / Golden Foothill Pkwy. / Clubview Dr. widening, optimizing traffic signals will maintain acceptable levels of service and the project will optimize the intersections in advance of operation. County Department of Transportation determines the schedule for its Capital Improvement Program ("CIP") projects and the County has estimated that the project will pay approximately \$18 million in Traffic Impact Fees ("TIF").

Question 14

14. EDH APAC members have concerns about compliance with the General Plan's Traffic Element in relation to LOS levels in the El Dorado Hills Community region at several critical intersections along Latrobe Road, White Rock Road, Carson Crossing, and most significantly at the US50 El Dorado Hills Blvd/Latrobe Interchange. In short, the proposed additional north and south travel lanes on Latrobe Road adjacent to the project are necessary, but EDH APAC has concerns that the additional travel lanes will not have any meaningful effect on Latrobe Road

north of Golden Foothill Pkwy, or more critically the US50 El Dorado Hills Blvd/Latrobe Road interchange

Answer to Question 14:

The questions are addressed in the Transportation Impact Analysis Report for the project and the information provided below is based on that analysis.

Table 8 in the Transportation Impact Analysis Report shows that project traffic on Latrobe Road would cause the roadway segment Level of Service (“LOS”) to change from D to a high E (volume-to-capacity ratio of 0.99) between Golden Foothill Parkway (S) and Golden Foothill Parkway (N). This operation is considered acceptable.

Table 7 shows the project would cause LOS F operations at Latrobe Road/White Rock Road during the PM peak hour. This is due only to one northbound through lane currently on Latrobe Road that continues through the interchange, which results in poor lane utilization on northbound Latrobe Road (south of the interchange) that affects traffic operations at the Latrobe Road/White Rock Road intersection during the PM peak hour. Therefore, poor operations at the Latrobe Road/White Rock Road during the PM peak hour are not due to capacity constraints at the intersection. The addition of project traffic would worsen this condition. However, Phase 2B of the US 50/Latrobe Road/El Dorado Hills Boulevard Interchange Improvements project (Adopted 2022 Capital Improvement Program, Project Number 36104001) will correct this condition and result in acceptable operations at the US 50 interchange and at the Latrobe Road/White Rock Road intersection (see Table 10 for details). The Capital Improvement Program identifies construction of Project Number 36104001 beginning in 2026/2027.

Question 15

15. This interchange concern also extends to the US50 Silva Valley Pkwy/White Rock Road interchange, which may become an alternative for commercial traffic to and from the project if LOS levels deteriorate further at the US50 El Dorado Hills/Latrobe Road interchange.

Answer to Question 15:

As presented in Table 7 of the Transportation Impact Analysis Report, the US 50/Silva Valley Parkway Interchange ramp-terminal intersections would operate acceptably at LOS B under existing condition with the addition of the proposed project during both the AM and PM peak hours. About 15 percent of the project’s truck trip generation (i.e., about 7 truck trips in the PM peak hour) were estimated to have an origin/destination on US 50 to/from the east. Consequently, the US 50/Silva Valley Parkway Interchange would have adequate capacity to accommodate additional project traffic without resulting in unacceptable traffic operations.

In addition, response to question 14 discusses planned/programmed improvements at the US 50/Latrobe Road/El Dorado Hills Boulevard Interchange. Specifically, Phase 2B of the US 50/Latrobe Road/El Dorado Hills Boulevard Interchange Improvements project (Adopted 2022 Capital Improvement Program, Project Number 36104001) will result in acceptable operations at the interchange and at the Latrobe Road/White Rock Road intersection (see Table 10 for details). The CIP identifies construction of Project Number 36104001 beginning in 2026/2027. Therefore, further deterioration would be a short-term condition.

For trucks, accessing US 50 from Latrobe Road has the following advantages as compared to access from White Rock Road/Silva Valley Parkway:

Slip On-Ramp – The eastbound on-ramp from Latrobe Road is a slip ramp, which allows for better acceleration compared to the loop on-ramp at the Silva Valley Interchange.

Acceleration Lane – The eastbound on-ramp from Latrobe Road enters an auxiliary lane that connects to the eastbound off-ramp at the Silva Valley Interchange. The auxiliary lane functions as an acceleration lane (especially for trucks).

Freeway Grade – The grade of eastbound US 50 at Latrobe Road is less than the grade at White Rock Road/Silva Valley Parkway, which is at the toe of the Bass Lake Grade. Less grade improves truck acceleration.

Question 16

16. EDH APAC members are concerned about the potential traffic impacts on White Rock Road from the Sacramento County Line to Latrobe Road. Has any analysis been provided in respect to the impact of the planned US50 Empire Ranch Road interchange in Folsom, which will terminate at White Rock Road in Sacramento County, just adjacent to Carson Crossing in El Dorado County? This pending interchange project may make an attractive alternative travel route for traffic to and from the project, as well as other commercial, employee, and regional traffic south of US50.

Answer to Question 16:

Tables 7 and 8 of the Transportation Impact Analysis Report show that roadway segments and study intersections on White Rock Road (at Carson Crossing Road and at Windfield Way/Town Center Boulevard) would operate at LOS C or better during the AM and PM peak hours under existing plus project conditions, indicating there will be reserve capacity at these study facilities. While the US 50/Empire Ranch Road interchange would provide an alternative for project vehicles traveling to/from the west on US 50, the shift in project traffic to that interchange would be small because the US 50/Latrobe Road/El

Dorado Hills Boulevard interchange would remain the most direct route for project trips. Use of the US 50/Empire Ranch Road interchange requires project trips to meander on the roadway system and engage in some degree of out-of-direction travel. The project does not rely on completion of an interchange at Empire Ranch Road.

The traffic impacts were analyzed for traffic operations under existing plus project conditions and evaluated the proposed project's consistency with the General Plan's Year 2025 and buildout (i.e., beyond 2025) scenarios (see pp. 46-48). The project is found to generate fewer daily, AM peak hour, and PM peak hour trips compared to the site trip generation analyzed for both the General Plan scenarios. Therefore, the project would not change the findings of the General Plan traffic analysis and EIR conclusions, which account for future year development, cumulative conditions, and future roadway improvements (such as the US 50/Empire Ranch Road interchange).

Question 17

17. An increase in commercial vehicles would increase the ambient noise and air pollution especially for the sensitive senior populations of Four Seasons and Oakmount of El Dorado Hills. An increase of traffic onto Carson Crossing Road and Golden Foothills Parkway would have similar detrimental impacts on local businesses and the Heritage residential community. What conditions of approval will be exist to medicate noise and air pollution

Answer to Question 17:

The project will comply with the County noise ordinance. The Acoustical Analyses - Sound Study concluded that the addition of traffic from the Project is not expected to have a negative impact on the area given the existing noise levels from traffic along Latrobe Road and Highway 50. The Prior EIRs also assumed and analyzed increases in noise and emissions resulting from transportation under buildout of the General Plan.

Question 18

18. Has the project proposed any contribution to the El Dorado County Intelligent Traffic System?

Answer to Question 18:

Yes, the El Dorado County Intelligent Traffic System is now included in the CIP and Traffic Impact Fee ("TIF") program. It is the applicant's understanding that prior projects made independent contributions before the Intelligent Traffic System was included in the CIP program.

Question 19

19. Will the project have the potential to accelerate El Dorado County Transportation Department projects in the El Dorado Hills area including traffic from the planned US50 Empire Ranch interchange that may result in traffic avoiding the US50 EDH Blvd/Latrobe Road interchange, and the section of Latrobe Road between US50 and White Rock Road?

Answer to Question 19:

County Department of Transportation determines the schedule for its CIP projects. The County has estimated that the project will pay approximately \$18 million in TIF fees.

Question 20

20. EDH APAC members have concerns about the suggested mitigation measures for the proposed building height of 110 feet. An analysis of the effectiveness of the proposed landscaping plan should be a key component to the Conditional Use Permit entitlements. Even mature landscaping will be difficult to obtain that can adequately mitigate the visual and aesthetic impacts of the building height. Does the landscape plan propose a timeline as to when its full effectiveness/maturity will be achieved?

Answer to Question 20:

The landscape plan exceeds County standards and currently proposes over 1,500 new trees that includes fast growing, evergreen tree species in key locations to provide visual screening from Latrobe Road and adjacent properties to the north and south.

The three tree species primarily used for screening are: *Cedrus deodora* / Deodar Cedar, *Pinus brutia eldarica* / Afghan Pine, and *Pinus halapensis brutia* / Calabrian Pine. The selected species reach a mature height of 80' at a rate of 3' per year. Because the landscaping plan includes a significant number of trees adjacent to Latrobe Road and the buildings are setback substantially from Latrobe Road, the trees will provide substantial shielding even before they reach a mature height.

Under R&D zoning standards, buildings could be built along Latrobe Road with only a 20-foot setback, which minimizes the available landscaping space. In contrast, the closest project building to Latrobe Road ranges from 534.5 to 690.6 feet from the centerline of Latrobe Road, which allows significant landscaping and trees.

Substantial tree increased heights are expected within approximately 15 years and a full mature height could take 25 years. Architectural renderings have been

prepared that show views from various public vantage points with mature and immature landscaping. With the significant number and staggered placement of trees, substantial setbacks, and placement of the closest building to Latrobe Road below grade, the architectural renderings show that the Project is significantly shielded from most viewpoints and less visually impactful than a 50-foot building setback only 20-feet from Latrobe Road, which would be allowed with a ministerial building permit.

Question 21

21. EDH APAC has significant concerns about the potential public safety impacts of the proposed project on fire/medical emergency response services in El Dorado Hills. We defer to the El Dorado Hills Fire Department to provide their expert analysis of the impact to their agency, and the balance of fire fire/medical emergency response services in El Dorado Hills.

Answer to Question 21:

The project applicant will coordinate with EDH Fire and comply with all conditions EDH Fire determines appropriate to address fire/medical emergency response services. The County estimates that the project will pay approximately \$5.9 million in fire district fees.

Question 22

22. EDH APAC recognizes the importance of the significant economic benefits of the proposed project, and that some compromise between impact and economic benefit is necessary. A distribution center of this size should result in multiple layers of economic benefits ranging from tax revenues to employment opportunities. In addition to these measurable values, local business opportunities, adjacent infrastructure requirements, and demands for more housing could result. In short, the need for a broad-based planning activity is warranted. However, the potential burden from impact and injury to the El Dorado Hills Community should also justify that a significant portion of the economic benefits be accrued to the El Dorado Hills Community, and not be used primarily as a funding source for needs or projects in other areas of the County. If the impacts are primarily in El Dorado Hills, the benefit should be accrued primarily in El Dorado Hills.

Answer to Question 22:

This comment primarily addresses whether the significant economic benefits resulting from the project will remain within the El Dorado Hills community. These considerations are within the purview of the El Dorado County Board of Supervisors for property and sales tax revenue from the project that are discretionary funds within the County's General Fund.

Question 23

23. EDH APAC members are concerned that all parties of interest and stakeholders fully participate in the approval/review process. Entities providing services should provide input including schools, fire departments, emergency services/healthcare, utilities, and parks. Additionally, the size and location of the project suggest the input from recognized organizations and citizens group including Blackstone HOA, Heritage HOA, Four Seasons HOA, EDH APAC, EDH South Communities, Four Seasons Civic League, Concerned Residents of EDH Heritage Village, Lennar Homes of California, and EDH Chamber of Commerce. Given the proximity to the Carson Creek Preserve the approval process should include inputs from U.S. Corp of Engineers, California Department of Fish and Wildlife, preserve manager Golden State Land Conservancy, and preserve owner Heritage HOA. EDH APAC members offer to facilitate the process of working with these diverse but critically important regional stakeholders.

Answer to Question 23:

All members of the public are able to participate in County public meeting for the project application. The Golden State Land Conservancy, public, Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife have the opportunity to comment on the project. The project also requires regulatory permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, and these federal and state agencies have been or will be directly engaged for their input during these approvals.