

El Dorado Hills Area Planning Advisory Committee



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February 16, 2023

RE: Project Frontier DR22-0003 CUP22-0016 Technical Advisory Committee Meeting, scheduled for February 22, 2023

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to offer the following questions, concerns, and comments on the proposed Project Frontier DR22-0003 CUP22-0016 to member agencies and staff for the February 22, 2023 Technical Advisory Committee meeting. EDH APAC Officers were able to have an initial project discussion with representatives of the project applicant on January 27, 2023. We deeply appreciated the applicants' efforts and commitment to transparency and outreach with the El Dorado Hills Community, and look forward to their planned project presentation at the March 15, 2023 EDH APAC monthly meeting at the El Dorado Hills Fire Station 85 Executive Conference Room.

Project Frontier Comment/Concern/Question List

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.
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?
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?
 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?
 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.
 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.

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 - Suncastr 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
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.
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.
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.
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.
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?
 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.
 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
 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.
 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.
 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

18. Has the project proposed any contribution to the El Dorado County Intelligent Traffic System?
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?
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?
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/medical emergency response services in El Dorado Hills.
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.
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.

EDH APAC appreciates the opportunity to review and provide feedback on proposed development projects to mitigate impacts in our El Dorado Hills Community. Through question and feedback, our goal is to realize the best possible project outcome for our community, the project applicants, and for El Dorado County.

Respectfully,

Robert Williams

EDH APAC Secretary

Project Frontier Subcommittee Chair

El Dorado Hills Area Planning Advisory Committee

“Non-Partisan Volunteers Planning Our Future Since 1981”