El Dorado Hills Area Planning Advisory Committee



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July 24, 2023

RE: CUP22-0017 – LATROBE ROAD SELF STORAGE (Cole Herrin/Westpark Storage LLC/Brittany Bair)

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to offer the following questions, concerns, and comments to member agencies and staff on the proposed CUP22-0017 – LATROBE ROAD SELF STORAGE:

- 1. We would like to better understand the proposed use of the 60,000 square feet of "incubator flex space" in 50 to 60 spaces referenced in the application. This is not a defined use type, and section 130.40.320(B)(1) limits human occupancy in self-storage facilities to "that required for transporting, arranging, and maintaining stored materials," We were unable to find this space specifically described or identified in any of the drawings submitted and available via eTRAKiT.
- 2. We also have concerns regarding water run-off from the site and the potential for it to carry silt, debris, and hazard material into what is identified as a "tributary of Carson Creek." Among the related environmental factors contributing to this concern include:
 - 2.1. This drainage lies just two-thirds of a mile north of the Carson Creek Preserve, a protected wetlands under both state and federal oversight and owned by the residents of the Heritage El Dorado Hills senior community. Have the Preserve owner or impacted agencies been contacted for input into this application?
 - 2.2. Per the EDC Conditional Use Permit, an on-site biological study is required if the site contains special status plants and animal species or natural communities and habitat. The Carson Creek (Draft) Long-Term Management Plan prepared by Helix Environmental Planning, Inc. in June of 2021 for the Us Army Corps of Engineers and California Department of Fish and Wildlife identified several rare and special status plant and wildlife species, including several special-status species in or near the Preserve. These new and significant findings identified and

- documented more recently than previous biological studies and surveys conducted years earlier with adoption of the EDC General Plan and EDH Business Park, clearly identify the need for further environmental investigation.
- 2.3. The El Dorado County Planning Department Environmental Questionnaire does not include answers to questions 6 through 10 addressing Drainage and Hydrology, nor were we able to find a copy of Drainage Report Appendix B referenced in the Utility Sheet C3.0. The comments in the included report from Soil Search Engineering dated March 11, 2022, stating "Drainage facilities shall be provided to carry surface and subsurface waters to the nearest drainage course designated for such purpose [pages 7 and 12]" raises our concern for the potential impact to the downstream Preserve.
- 2.4. We particularly want to understand the plans and measures proposed to mitigate the impact of water runoff that carries pollutants from stored vehicles (fuel and oil), chemicals, sediment, trash, and other debris.
- 2.5. We respectfully ask the status of any on-site biological studies, Biological Resource Assessments or Environmental Reviews associated with this site, that assess the impacts to any wetlands or riparian habitat on-site, adjacent, or downstream of the proposal.
- 3. We recognize Ordinance 5127, adopted September 1, 2020, amended Title 130 to expand allowable uses within commercial and industrial zone to include self-storage facilities "consistent with the intent of each respective zone," and the amended 130.23.020 matrix identifies allows self-storage facilities only with a Conditional Use Permit process. However, we respectfully question whether this facility is consistent with the definition of the Research and Development zone. The "incubator flex space" identified in the application may well fit this definition, but when combined with a self-storage facility that specifically places stringent limits on human occupancy, the application seems unsuited for the R&D zone.
- 4. The applicant confirms that a Traffic Impact Study (TIS) is required. None of the required TIS documentation listed in the EDC initial TIS Determination has been made publicly available. In particular, we are concerned about traffic impact on Latrobe Road and secondary roadways.

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

Respectfully,

George Steed, CUP22-0017 – LATROBE ROAD SELF STORAGE Subcommittee Chair Robert Williams, Secretary

El Dorado Hills Area Planning Advisory Committee "Non-Partisan Volunteers Planning Our Future Since 1981"