

El Dorado Hills Area Planning Advisory Committee



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The County of El Dorado Planning Department
Director of Planning: Karen Gardner

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February 14, 2024

RE: Director's Determination - Fulfillment Center/Heavy Distribution/Parcel Hub Uses

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) officers and voting members, along with many members of the community, are curious about the status of the Director's Determination letter regarding Fulfillment Center, Heavy Distribution, and Parcel Hub Uses that you provided in June of 2023. While our community welcomes your findings in respect to the existing Research and Development zone that guides elements of the ongoing development of the El Dorado Hills Business Park, our community would like to understand when the formal implementation of the determination may take effect in a Zoning Ordinance update.

Our concerns center on two items.

One, that while the finding you provided does add some clarity to how R&D zones may continue to develop, it offers no specific metrics to define what Fulfillment Center, Heavy Distribution, or Parcel Hub activities are. Without a clear definition, community members feel that new buildings being proposed for construction in the El Dorado Hills Business Park on speculation, without a specified use, or end user, may in effect be avoiding the intent of your June 2023 determination letter. While we recognize and appreciate your clear intent, without empirical standards and definitions, it leaves room for ambiguity, and misinterpretation. Clearly, it benefits the county, Planning and Building Department staff, property owners/developers, and county residents to have defined standards going forward. Further, many years down the road, a future Director of Planning could avoid the intent of your determination with the simple finding of "I will know a Fulfillment Center when I see it."

Second, recent marketing offerings through commercial building/land marketing companies suggest that parcels owned in the El Dorado Hills Business Park, primarily for the Pac West

parcels north of Golden Foothills Pkwy, and along the future extension of Carson Crossing Drive, combined with a Pac West 2022 application/request for a parcel split of 4 parcels into 14 ([Carson Creek R&D Project P22-0009](#)) that calls for 840,000 SF to 1,100,000 SF of Industrial Wholesale Distribution Buildings continues to provoke concern in the El Dorado Hills Community. 840K-1.1 million SF of Industrial Wholesale Distribution space presents a sense of fulfillment center activity, while not as a single project, but a cumulative impact consistent with the old trope 'death by 1.1 million sf of cuts'. ([Loopnet marketing materials attached](#)).

While Pac West kindly shared some details for [buildings 112 and 113](#) at our August 2023 EDH APAC meeting, the inclusion of a combined potential of 40-plus loading spaces between the buildings remains a significant concern for the community. Pac West described Buildings 112 and 113 as speculation buildings that 'may or may not' have distribution uses, however potential impacts on the road networks for residents along Latrobe Road, the EDH Blvd-Latrobe RD/US50 interchange, and for Carson Crossing Dr, specifically for residents in the age-restricted Heritage and Four Seasons communities, continues to alarm residents. While recognizing that the County approved these residential uses a quarter of a century ago, in very close proximity to the Business Park R&D use approved in the late 1980s, the El Dorado Hills Community feels that a very focused analysis should be applied to these buildings being built on speculation to ensure that they don't avoid the intent of the Fulfillment Center, Heavy Distribution, and Parcel Hub Uses of your Director's determination of June 2023. With the obvious potential conflicts between residential and Fulfillment Center type uses in mind, our collective approach should be to minimize impact where possible so that we can avoid future conflicts. As an example, the County allowed the inclusion of [moving a helicopter landing pad for the Aerometals building expansion to within a few hundred feet of approved Four Seasons residential homes in 2006](#). The helicopter landing pad was a required disclosure to future Four Seasons property owners, but clearly shows the potential for conflict between residential and commercial uses. While Aerometals is a wonderful success story, and welcomed members of our EDH Community, it left residents wondering in 2006 if it was appropriate to approve a residential land use adjacent to an existing R&D use with such clear conflict.

To avoid future conflict with Industrial Wholesale Distribution development in the R&D zone of the EDH Business Park, EDH APAC would like to suggest that specific definitions and standards be applied so that Planning Staff, developers, and residents can identify with certainty what activities qualify as Fulfillment Center, Heavy Distribution, and Parcel Hub Uses. Such metrics might be:

- A defined Floor Space to Loading Dock/Loading Space ratio.
- ADT estimates not only for large commercial vehicles, but for commercial and independent parcel delivery activities.
- A standardized Transportation Impact Study (TIS) Initial Determination of the project for Transportation Department analysis, along with an ongoing monitoring program to ensure compliance following project approval - so that business growth of the initial user, or an alternate future use, does not later, after project approvals, violate the intent of the

restriction of Fulfillment Center, Heavy Distribution, and Parcel Hub Uses designation in an R&D zone, and become a defacto approved Fulfillment Center use in an R&D zone.

EDH APAC would welcome continued discussion, and embraces the opportunity to help define standards that will benefit the County, developers, and the El Dorado Hills community.

Respectfully,

John Davey
Chair
El Dorado Hills Area Planning Advisory Committee.

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