



APAC 2025 Officers

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TO: El Dorado County Planning and Building Department

ATTN: Cameron Welch, Senior Planner, El Dorado County Planning and Building Department

FROM: El Dorado Hills Area Planning Advisory Committee (EDH APAC)

RE: Technical Comments on Draft EIR for EDH Costco Project (PD15-0001, CUP23-0012, V22-0001)

March 22, 2026

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to submit the following comments, questions, and concerns regarding the proposed EDH Costco project PD15-0001, CUP23-0012, V22-0001

I. Executive Summary

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) recognizes the potential economic contribution of the proposed Costco project. However, our technical review of the Draft EIR (DEIR) and Transportation Impact Analysis (TIA) reveals fundamental conflicts with the **El Dorado County General Plan** and significant unmitigated impacts to community safety and residential health. As currently designed, the project prioritizes corporate logistics over the integrity of local infrastructure and the well-being of the primary sensitive receptor: **Oak Meadow Elementary School**.

1. Introduction and Standing

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) submits these comments to identify critical deficiencies in the Draft EIR (DEIR) and Transportation Impact Analysis (TIA). Our review focuses on the project's failure to achieve General Plan consistency and the inadequacy of proposed mitigation for identified "Significant and Unavoidable" impacts.

2. General Plan Inconsistency: Level of Service (LOS)

The TIA reveals that the project, even with mitigation, violates mandatory General Plan Policy **TC-Xd**.

- **LOS F Operations:** Intersection #15 (White Rock Rd & Valley View Pkwy) is projected to operate at LOS F in Near-Term Plus Project conditions, with delays exceeding 180 seconds.

- **Mandatory Standards:** In a Community Region, any operation below LOS E is a direct policy violation.
- General Plan Policy TC-5b: Page 401 Impact 3.14-1 states there will be construction of frontage improvements for sidewalks and pedestrians, but what about beyond the project site? Will sidewalks be installed the full length of Clarksville Crossing between Silva Valley and White Rock Road according to policy that sidewalks be on all roads in commercial subdivisions?
- **Requested Action:** The FEIR must identify a feasible infrastructure solution that restores LOS E or better; an "override" is not a substitute for General Plan consistency.

3. Public Health and School Proximity And General Plan Inconsistency

The 65-foot proximity to Oak Meadow Elementary School creates a unique environmental justice and safety risk. This DEIR fails to analyze and mitigate the following issues, and results in a technical CEQA failure/omission to analyze land use compatibility with a sensitive receptor.

- **Cancer Risk Thresholds:** The unmitigated cancer risk of 11 in one million exceeds the significance threshold.
- **Mitigation Loopholes:** Mitigation Measure 3.2-4a contains an "unavailability" clause for Tier 4 Final equipment that essentially renders the protection optional.
- **Pedestrian Permeability and Sensitive Receptors:** CEQA requires an analysis of impacts on "sensitive receptors" (schools). The project introduces a massive, high-turnover regional destination directly adjacent to a campus with "open" architecture (exterior-facing classroom doors). Considering the **OPEN CAMPUS** nature of Oak Meadow Elementary School, the DEIR fails to analyze how the physical proximity and increased foot traffic from non-local visitors create a "land use conflict" that **compromises the security of the student population**.
- **Hazardous Pedestrian/Vehicle Interface:** Beyond "intent to harm," the sheer volume of 21,000+ new daily VMT creates a physical safety hazard for students walking to and from Oak Meadow Elementary School. The DEIR's failure to provide a specific "Safe Routes to School" analysis for this new traffic volume is a major omission.
- **Inconsistency with General Plan Policy.** The General Plan mandates that the County prioritize "the safety of the County's residents" in land use decisions. The DEIR lacks an analysis of placing a high-intensity regional facility next to an open-access school is a fundamental inconsistency with the General Plan's safety goals.

4. Operational Noise and Sleep Interference

The DEIR fails to account for the qualitative nature of nighttime logistics noise.

- **Receiving Hours:** Operations occurring between 2:00 a.m. and 7:00 a.m. are subject to the 5 dB tonal penalty under General Plan Table HS-4, which was not applied to the "beeping" of backup alarms.

5. Closing Statement

We incorporate by reference the technical data contained in the following six appendices, attached Exhibits, as well as our review notes compiled as we analyzed the DEIR. We look forward to reviewing the substantive, point-by-point response to these inquiries in the Final EIR.

II. Primary Transportation & Infrastructure Failures

The project's transportation plan is built upon a foundation of **"Significant and Unavoidable"** VMT impacts and a disregard for El Dorado County General Plan mandated Level of Service (LOS) standards.

- **General Plan Violations (LOS F):** The TIA confirms that even with mitigation, the **White Rock Road & Valley View Parkway** intersection will operate at **LOS F**. This is a direct violation of Policy **TC-Xd**, which mandates **LOS E** or better in Community Regions.
- **Infrastructure Obsolescence:** The proposal to install a **"temporary"** signal at Clarksville Crossing—only to remove it for a future road extension—is a failure of long-range planning that creates unnecessary future hazards.
- **Corridor Omissions:** The TIA scope dangerously excludes the northern **Silva Valley Parkway** corridor (to Green Valley Road) and the **Bass Lake Road** segment from Serrano Parkway to Silva Valley Parkway, as well as to the Bass Lake Road - US50 interchange, ignoring primary routes for regional shoppers north and east of the project site.
- **Study Area Omission (Green Valley Road):** The TIA study area abruptly terminates at Silva Valley Parkway and Harvard Way. It excludes the **Green Valley Road at Silva Valley** intersection, a major regional feeder for North County shoppers.
- **Clarksville Crossing Access Hazard:** The site plan lacks dedicated **left-turn pockets** for southbound traffic entering the South Site warehouse. Without these, southbound vehicles will queue in active travel lanes, creating a primary safety hazard during peak Saturday hours.
- **Signal Discrepancies:** Figure 2-13 shows a signal at Clarksville Crossing, while other diagrams only show a turn lane. EDH APAC objects to "temporary" infrastructure that creates circulation hazards when removed shortly after project opening.
- **Expansion of Clarksville Crossing to, at minimum, include a center Two-Way Left Turn** There is no reference in **Site Access and Roadway Improvements** or in **Section 3.14 regarding any Turn Lane**. A Traffic Signal at the intersection will not mitigate the flow patterns on Clarksville Crossing with 3 driveways on a two-lane road allowing entry

and exit into the project site. **Trucks will only expand this issue.** Do ALL right or left turns in the project conform to turn radius standards from the California Highway Design Manual, or other related Caltrans state standards up to the 70 foot long, double-axle trailers referenced? There should be no truck encroachment on traffic flowing the other direction.

- This would include right turn INTO parking lot from Clarksville Crossing, OUT of project parking lot, and right turn from Clarksville Crossing onto SB Silva Valley.
- Also require validation of truck turns radius left and right turns for Clarksville Crossing and White Rock Road intersection.
- **General Plan Policy TC-5b:** Page 401 Impact 3.14-1 states there will be construction of **frontage** improvements for sidewalks and pedestrians, but what about beyond the project site? Will sidewalks be installed the full length of Clarksville Crossing between Silva Valley and White Rock Road according to policy that sidewalks be on all roads in commercial subdivisions?

III. Public Health & Community Sensitivity

The applicant's stated goal of being "sensitive to the adjacent community" is contradicted by the project's technical specifications.

Benzene & Meteorology: EDH APAC APPENDIX B

The project identifies the fuel station property line just **65 feet** from Oak Meadow Elementary. The DEIR's "Less than Significant" finding for health is based on generic regional modeling that ignores localized mountain and foothills meteorology.

- **Localized Topographic Trapping:** Topographic features in El Dorado Hills create diurnal wind reversals and nighttime cold air drainage. These result in temperature inversions that trap pollutants like **Benzene and Diesel Particulate Matter (DPM)** close to the ground.
- **Toxic "Fumigation" Events:** During the morning transition period—when students arrive—elevated pollutant plumes are mixed downward to the ground by convection (fumigation).
- **HRA Exceedance:** The unmitigated cancer risk of **11 in one million** exceeds the 10-in-one-million significance threshold. Given the proximity to school property, APAC demands the removal of the "availability" loophole in **MM 3.2-4a**; Tier 4 Final equipment must be mandatory for all North Site construction.
- **Risk to Sensitive Receptors:** With the **Oak Meadow Elementary** property line just **65 feet** away, the unmitigated cancer risk of **11 in one million** is unacceptable. We demand a non-negotiable requirement for **Tier 4 Final** construction equipment to protect student health.
- **Underestimated Emissions:** A Study from ScienceDirect.com found that gasoline station vent pipes can emit 10 times more volatile organic compounds (VOCs) than

commonly used in regulatory estimations, making current 300-foot setback regulations potentially inadequate. (EDH APAC [Exhibit 4](#))

- **Pedestrian Permeability and "Sensitive Receptors":** CEQA requires an analysis of impacts on "sensitive receptors" (schools). The project introduces a massive, high-turnover regional destination directly adjacent to a campus with "open" architecture (exterior-facing classroom doors). Considering the **OPEN CAMPUS** nature of Oak Meadow Elementary School, the DEIR fails to analyze how the physical proximity and increased foot traffic from non-local visitors create a "land use conflict" that **compromises the security of the student population.**
- **Hazardous Pedestrian/Vehicle Interface:** Beyond "intent to harm," the sheer volume of 21,000+ new daily VMT creates a physical safety hazard for students walking to and from Oak Meadow Elementary School. The DEIR's failure to provide a specific "Safe Routes to School" analysis for this new traffic volume is a major omission.
- **Inconsistency with General Plan Policy.** The General Plan mandates that the County prioritize "the safety of the County's residents" in land use decisions. The DEIR lacks an analysis of placing a high-intensity regional facility next to an open-access school is a fundamental inconsistency with the General Plan's safety goals.
- **Nighttime Logistics Noise:** Warehouse receiving is scheduled for **2:00 a.m. to 1:00 p.m.** The DEIR fails to apply the mandatory **5 dB tonal penalty** (per General Plan Table HS-4) to the disruptive, high-pitched "beeping" of backup alarms during these noise-sensitive hours.
- **Aesthetic Overreach:** The request for a **1,294 sq. ft. signage variance** and the use of **37-foot light poles** represents a significant "industrialization" of a suburban corridor currently defined by natural assets and heritage oaks.
- **Silent Blasting:** DEIR Page 3343.11.4 Environmental Impacts and Mitigation Measures states "In addition, this analysis assumes that silent blasting would be required on the North Site during project construction. Silent blasting would likely include drilling rock, and thus modeling for this phase included the simultaneous operation of a hoe ram and associated equipment (i.e., dozer, excavator)." Is "Silent Blasting" an option to further mitigate noise impacts during the construction period? Can an increase of the percentage of Silent Blasting from all blasting activities be considered to better reduce noise impacts?

IV. Unanalyzed Project Alternatives: Appendix E

APAC formally requests the FEIR analyze the following feasible alternatives that would reduce significant impacts:

1. **Reduced Capacity Fuel Facility (16 Pumps):** To lower the intensity of localized TAC emissions.

2. **Southernmost North Site Relocation:** Moving the 13,000-sq.-ft. fuel canopy to the absolute southern boundary of the North Site to maximize the physical buffer to the school.
3. **No Fuel Station Alternative:** To entirely eliminate the risk of Benzene hotspots and NOA release adjacent to student populations.

V. Archaeological/Cultural and Tribal Cultural Resources

Omission of Tribal Consultation and Indirect Impacts to the Historic Clarksville Townsite

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) expresses grave concern regarding the adequacy of the Cultural Resources analysis in the Draft EIR (DEIR). Specifically, the DEIR fails to provide evidence of robust, completed consultation with traditionally and culturally affiliated California Native American tribes under Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18). While the DEIR mentions archival searches, it lacks a substantive evaluation of Tribal Cultural Resources (TCRs) informed by direct tribal feedback. As tribes are the unique experts on their own heritage, the absence of their input renders the current analysis of the project site—which sits in a culturally sensitive region—incomplete and legally vulnerable. We question why the County has not disclosed the status of these consultations or integrated tribal-led mitigation measures into the DEIR.

Furthermore, the DEIR provides no analysis of indirect impacts to the adjacent **Historic Clarksville Townsite**. Located only 1,200 feet from the North Site (Warehouse) and 1,300 feet from the South Site (Fuel Station), Clarksville represents a foundational element of El Dorado County's Gold Rush history. The introduction of heavy tractor-trailer traffic, 24-hour industrial lighting, and a 32-pump fuel facility creates a significant "change in setting" for this historic resource. CEQA requires an analysis of impacts to the historical significance of an environment, including its setting and "feeling." The DEIR's failure to evaluate how the project's noise, vibration, and visual industrialization affect the integrity of the Clarksville site is a major omission that must be corrected in the Final EIR.

VI. Urban Decay

Inadequacy of Urban Decay Analysis and the Necessity of a Comprehensive Fiscal Impact Study

The EDH APAC asserts that the Urban Decay Analysis provided in the DEIR is insufficient as it fails to account for the unique economic drain this project places on the El Dorado Hills (EDH) community. While CEQA typically focuses on physical environmental changes, the law requires an analysis of "Urban Decay" when economic shifts lead to the physical deterioration of existing

retail centers. The DEIR's conclusion of a "Less Than Significant" impact fails to address the "social costs" of the project—specifically the potential for long-term health impacts on sensitive receptors at Oak Meadow Elementary and the physical degradation of local infrastructure under the weight of regional traffic.

Furthermore, the DEIR lacks a "Benefit vs. Burden" nexus. As outlined in our **Appendix G**, and supported by EDH APAC [Exhibit 5](#) while the project will generate significant sales tax for the County's General Fund, the massive infrastructure costs and environmental burdens—noise, air quality degradation, and road wear—are borne exclusively by the residents of El Dorado Hills. Without a site-specific Fiscal Impact Study, similar to those required for Costco projects in Ukiah and Elk Grove, the community is left with a "Significant and Unavoidable" VMT impact while the revenue generated may be diverted to projects far outside the impacted area. We formally request that the County undertake a Fiscal Impact Analysis to ensure that the infrastructure costs necessitated by this project are funded by the revenue it generates *locally*.

VII. Formal Request for Modifications

EDH APAC insists on the following conditions before project approval:

1. **Mandatory LOS Compliance:** Prior to the issuance of a certificate of occupancy, the applicant shall demonstrate that the **White Rock Road & Valley View Parkway** intersection operates at **LOS E or better**.
2. **Updated Traffic Impact Analysis:** An enhanced TIA MUST be completed that considers impacts at all intersections on Silva Valley Pkwy from White Rock Road, and north to Green Valley Road for all dayparts. Missing intersection analysis MUST be completed for alternative intersections including Silver Springs Pkwy, and Bass Lake Road.
3. **Truck Routing Enforcement:** A formal **Truck Routing Plan** shall be established as a condition of the CUP, strictly prohibiting warehouse delivery trucks and fuel tankers from utilizing **Silva Valley Parkway north of the project site** to protect the school zone and residential corridors. The Truck Routing Plan should also analyze and consider LOS impacts at the White Rock Road - Clarksville Crossing intersection, and explore a potential mitigation of two left turn movement lanes for eastbound White Rock Road, and southbound Clarksville Crossing.
4. **Mandate Permanent Access:** Build permanent northern access aligned with future Country Club Drive now; abandon the "temporary" signal concept.
5. **County CIP Project No: 36105042:** To mitigate traffic LOS impacts, the County's CIP Project No: 36105042 White Rock Road Widening (2 to 4 lanes) - Post St to South of Silva Valley Parkway must be completed prior to an occupancy permit being issued for the Costco Project.

6. **Real Analysis and quantification of Fuel Station Air Quality impacts.** Analysis should be based on project site conditions in the Foothill Region, and **NOT** on an existing set of data from more than 30 miles away in a Central Valley location
7. **Analyze the potential for soundwall noise mitigation:** 1) Along Silva Valley Pkwy on the South Project Site, and 2) on north and west boundaries of the Fuel Station proposed on the North Project Site.
8. **Noise Mitigation:** In regards to operational noise mitigation, mandate "white noise" broadband backup alarms and prohibit high-decibel receiving activities before **7:00 a.m.**
9. **Receiving Hour Restrictions:** To protect residential sleep health, the **2:00 a.m. to 7:00 a.m.** receiving window shall be restricted. High-decibel loading dock activities, including the release of air brakes and engine idling, shall not occur before **7:00 a.m.**
10. **Nighttime Concrete Pour Mitigation:** For the estimated **eight days of nighttime pours**, the applicant shall provide a noise-shielding plan that guarantees a **10 dBA reduction** at the property lines of Village Green Drive residents.
11. **Tier 4 Final Requirement:** The "availability" loophole in **Mitigation Measure 3.2-4a** shall be removed. All construction equipment over 50 hp used on the **North Site** (adjacent to Oak Meadow Elementary) **must** be Tier 4 Final compliant; no Tier 3 exceptions shall be granted given the **65-foot proximity** to the school.
12. **Independent Air Monitoring:** The applicant shall fund **continuous, independent third-party air monitoring** for Naturally Occurring Asbestos (NOA) at the **Oak Meadow Elementary** property line during all grading and "silent blasting" activities on the North Site.
13. **Proactive Soil Remediation:** Prior to any grading activity on the South Site, the applicant shall conduct **Phase II core sampling** specifically around the identified **concrete pit and trough remnants** to identify and remediate any legacy contamination before it is disturbed by heavy machinery.
14. **Reduction of Light Pole Heights:** All site lighting poles shall be restricted to a **maximum height of 25 feet**. The proposed **37-foot poles** are inconsistent with the suburban design context of El Dorado Hills.
15. **Denial of Signage Variance:** The request for **1,294 square feet of signage (V22-0001)** shall be denied. All signage must strictly adhere to the standard square footage allowed under the **CR-PD** zoning to minimize nighttime light pollution and "sky glow."
16. **Project Compliance with General Plan Consistency - Public Safety Oak Meadow Elementary School:** The project proposes a fundamental inconsistency with the General Plan's safety goals. CEQA requires an analysis of impacts on "sensitive receptors" (schools). The project introduces a massive, high-turnover regional destination directly adjacent to a campus with "open" architecture (exterior-facing classroom doors). Considering the **OPEN CAMPUS** nature of Oak Meadow Elementary School, the DEIR fails to analyze how the physical proximity and increased foot traffic from non-local visitors create a "land use conflict" that **compromises the safety and security of the student population**. The El Dorado County General Plan mandates that the County prioritize "the safety of the County's residents" in land use decisions. The

DEIR lacks an analysis of placing a high-intensity regional facility next to an open-access school. Mitigation must resolve this inconsistency with the General Plan.

17. **Updated Archaeological/Cultural and Tribal Cultural Resources Analysis:** EDH APAC asks for inclusion of an analysis of potential Archaeological/Cultural project impacts to the Historic Clarksville Township Site, and more robust analysis of Tribal Cultural Resources impacts, including detailed findings and Tribal consultation feedback.
 18. **Mandatory Fiscal Impact Study & Revenue Nexus:** A comprehensive Fiscal Impact Study, modeled after the 2013 Ukiah Costco Project EIR, must be completed for the El Dorado Hills project. This study shall analyze and compare the General Fund revenue generated *specifically* within the El Dorado Hills community against the localized infrastructure costs and long-term social/environmental "costs" (e.g., road maintenance, public safety response, and health monitoring). The project's Conditions of Approval should ensure a "Revenue Nexus" where impact-related funds are prioritized for infrastructure and mitigation projects **within El Dorado Hills** to offset the localized "Significant and Unavoidable" impacts identified in the DEIR.
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SUPPORTING APPENDICES LIST

APPENDIX A: Transportation and Infrastructure

This appendix addresses the physical and geographic failures of the TIA.

- **Mandatory LOS Failure (General Plan Policy TC-Xd):** Even with mitigation, the **White Rock Road & Valley View Parkway** intersection will operate at **LOS F**, with delays exceeding 180 seconds. This is a direct violation of the mandatory LOS E standard for Community Regions.
- **Analysis Gaps:** The TIA study area ends at Harvard Way, ignoring the northern Silva Valley Parkway corridor to Green Valley Road and the Bass Lake Road segment between Serrano and Silva Valley.
- **Temporary Signal Hazard:** The TIA identifies a signal at Clarksville Crossing (Intersection #10) as a temporary measure. The FEIR must address the "conflict minimization" failures that occur when this signal is removed.
- **Peak Hour Omission:** Saturday midday represents the project's peak volume (1,697 trips), yet Saturday analysis was excluded from the majority of the study intersections.
- **Clarksville Crossing Access Hazard:** The site plan lacks dedicated **left-turn pockets** for southbound traffic entering the South Site warehouse. Without these, southbound vehicles will queue in active travel lanes, creating a primary safety hazard during peak Saturday hours.
- **Signal Discrepancies:** Figure 2-13 shows a signal at Clarksville Crossing, while other diagrams only show a turn lane. APAC objects to "temporary" infrastructure that creates circulation hazards when removed shortly after project opening.
- **Commercial Truck Turn radius analysis:**
 - Left and Right turn movement turn radius analysis **MUST** be required for the east and westbound **on and off ramps of the Silva Valley Pkwy US50 Interchange.**
 - Commercial Truck Turn radius analysis must be completed at **each of the project driveways on Silva Valley Pkwy and Clarksville Crossing.**
 - Commercial Truck Turn radius analysis must be completed at **White Rock Road and Clarksville Crossing.**

APPENDIX B: Public Health, Air Quality, and Asbestos Mitigation

Focused on the 65-foot buffer zone to Oak Meadow Elementary.

The project identifies the fuel station property line just **65 feet** from Oak Meadow Elementary. The DEIR's "Less than Significant" finding for health is based on generic regional modeling that ignores localized mountain meteorology, and included data modeling from the Sacramento Valley region, and not the site-specific foothills region in El Dorado County.

- **Localized Topographic Trapping:** Topographic features in El Dorado Hills create diurnal wind reversals and nighttime cold air drainage. These result in temperature inversions that trap pollutants like **Benzene and Diesel Particulate Matter (DPM)** close to the ground.

- **Toxic "Fumigation" Events:** During the morning transition period—when students arrive—elevated pollutant plumes are mixed downward to the ground by convection (fumigation).
- **HRA Exceedance:** The unmitigated cancer risk of **11 in one million** exceeds the 10-in-one-million significance threshold. Given the proximity to school property, APAC demands the removal of the "availability" loophole in **MM 3.2-4a**; Tier 4 Final equipment must be mandatory for all North Site construction.
- **NOA Monitoring:** We demand the FEIR include a condition for continuous, real-time asbestos monitoring at the school property line during all grading.
- **Pit and Trough Hazard:** Based on the Phase I ESA, core sampling must be mandatory for the concrete structures on the South Site prior to any ground disturbance.
- **Pedestrian Permeability and Sensitive Receptors:** CEQA requires an analysis of impacts on "sensitive receptors" (schools). The project introduces a massive, high-turnover regional destination directly adjacent to a campus with "open" architecture (exterior-facing classroom doors). Considering the **OPEN CAMPUS** nature of Oak Meadow Elementary School, the DEIR fails to analyze how the physical proximity and increased foot traffic from non-local visitors create a "land use conflict" that **compromises the safety and security of the student population.**
- **Inconsistency with General Plan Policy.** The General Plan mandates that the County prioritize "the safety of the County's residents" in land use decisions. The DEIR lacks an analysis of placing a high-intensity regional facility next to an open-access school is a fundamental inconsistency with the General Plan's safety goals.

APPENDIX C: Operational Logistics and Tonal Noise Study

Rebutting the "Less than Significant" finding for early morning noise.

- **Impulsive Noise:** The FEIR must analyze L_{\max} (peak) noise rather than L_{eq} (average) for the 2:00 a.m. to 7:00 a.m. receiving window.
- **Broadband Alarms:** We demand a condition of approval requiring "white noise" backup alarms for all warehouse vehicles.

APPENDIX D: Project Discrepancy and Aesthetics Memo

Contrasting "Sensitive Design" with industrial scale.

- **Lighting Scale:** 37-foot poles create significant light spillover for residents located only 9–10 feet from the property line.
- **Signage Variance:** Request V22-0001 for 1,294 sq. ft. of signage is inherently inconsistent with a "sensitive" suburban design.

APPENDIX E: Evaluation of Project Alternatives (FEIR Mandate)

- **Reduced Capacity Fuel Facility Alternative (16 Pumps) - Project Objective vs. Impact:** While the applicant seeks to meet member demand for high-quality gasoline , the proposed 32-pump configuration results in a Significant and Unavoidable VMT impact and localized benzene "hotspots".
- **Southernmost Relocation of Fuel Facility (Within North Site) - Impact Reduction:** This alternative mandates moving the 13,000-square-foot fuel canopy to the **absolute southern boundary of the North Project Site**. Relocating the facility as far south as possible - near the shared signalized access point - would maximize the physical buffer to the school and residential receptors, utilizing the remaining 13.79 acres of the North Site as a safety and air-quality buffer.
- **No Fuel Station Alternative - Health and Safety Prioritization:** This alternative evaluates the development of the Warehouse on the South Site without any gasoline dispensing facility on the North Site.

APPENDIX F: Supporting Evidence Regarding Tribal Consultation and Clarksville Historic Setting

Section F.1: Regulatory Requirements for Tribal Consultation (AB 52)

- **Summary of Law:** Detail the requirement that the Lead Agency (El Dorado County) must begin consultation with tribes prior to the release of a DEIR if a tribe has requested it.
- **Missing Data Points:** A list of questions for the County:
 1. Which tribes were contacted, and on what dates?
 2. Did any tribes identify the project area as part of a larger Cultural Landscape?
 3. Why are there no specific Tribal Monitoring requirements included in the Mitigation Monitoring and Reporting Program (MMRP)?

Section F.2: Significance of the Clarksville Townsite

- **Historical Context:**The Clarksville Townsite was a vital stop on the Carson Emigrant Trail and the Lincoln Highway.
- **Proximity Analysis:** * **North Site Warehouse:** ~1,200 feet distance.
 - **South Site Fuel Station:** ~1,300 feet distance.
- **Potential Indirect Impacts to be Evaluated:**
 - **Vibration:** Impact of constant heavy delivery vehicles (post-midnight to 8:00 AM) on any remaining historic foundations or cellars.
 - **Atmospheric/Visual:** How the "glow" from the 13,000 sq. ft. fuel station canopy alters the historical nighttime setting of the townsite.

- **Noise:** Impact of the tire center and loading docks on the quietude required for a historic interpretive site.

APPENDIX G: Urban Decay Analysis and Localized Fiscal Impacts

Overview: This appendix evaluates the potential for the Project to cause physical urban decay through the diversion of sales from existing local retailers and examines the "Social Costs" versus "Fiscal Benefits" of the development. As highlighted in [Exhibit 5 \(Costco Warehouse: Fiscal Impact vs. Social Cost\)](#), the project presents a significant imbalance where the environmental and social burdens remain in El Dorado Hills while the economic benefits are dispersed countywide.

- **Fiscal Precedence:** Notes that Costco projects in Ukiah (2013), Elk Grove (2022), and San Diego (2015) required full fiscal impact analyses to address General Fund impacts and infrastructure management. A similar study is required here to itemize project-related capital improvements and identify their funding sources.
- **Infrastructure Nexus:** Challenges the current distribution of Traffic Mitigation (TIF) fees. Because TIF fees are spread countywide, El Dorado Hills faces a shortfall in funding the multi-million dollar local improvements necessitated specifically by this project's growth-inducing effects.
- **Social Cost Analysis:** References the inadequate analysis of tailpipe emissions and the potential for a "toxic cleanup site" in close proximity to a flood channel and an elementary school, asserting that these long-term risks constitute a physical and social cost that has not been properly weighed against the project's tax revenue.

APPENDIX A: Transportation and Infrastructure Technical Rebuttal

1. General Plan Inconsistency & LOS Violations

- **Intersection #15 (White Rock Rd & Valley View Pkwy):** The TIA documents that this intersection operates at **LOS F** in Near-Term No Project conditions with a delay exceeding **100 seconds**.
- **Failure to Mitigate:** Despite proposed improvements (adding a northbound right-turn lane and increasing storage), the Near-Term Plus Project delay remains at **180.7 seconds**, firmly within **LOS F**.
- **Mandatory Policy Violation:** This operation violates **General Plan Policy TC-Xd**, which mandates **LOS E** or better for Community Regions.
- **Technical Inquiry:** Will the FEIR identify a feasible infrastructure modification to restore this intersection to **LOS E**, or is the County prepared to approve a project that is in direct conflict with its own mandatory General Plan standards?

2. Deficiency in Study Scope (Corridor Omissions)

- **Northern Silva Valley Parkway:** The TIA study intersections terminate at **Silva Valley Parkway and Harvard Way (Intersection #5)**.
- **Missing Northern Feeder:** No analysis was provided for the segment between **Serrano Parkway and Green Valley Road**, despite this being a primary access route for regional customers and the **442 AM / 1,277 PM / 1,697 Saturday** trips generated by the project.
- **Bass Lake Road Gap:** The TIA fails to analyze the **Bass Lake Road** segment between **Serrano Parkway and Silva Valley Road**, an essential local artery for the El Dorado Hills community.
- **Technical Inquiry:** Why were these primary feeder segments excluded from the study scope, and will the FEIR include a supplemental analysis to determine the project's impact on these corridors?

3. Failure to Analyze Peak Shopping Period (Saturday Midday)

- **Incomplete Saturday Modeling:** While the TIA acknowledges that **Saturday midday** is the project's peak traffic hour (generating **1,697 trips** compared to **1,277 in the PM peak**), it only performed Saturday analysis for a limited subset of the 19 study intersections.
- **Data Exclusion:** Critical regional intersections, such as **Latrobe Road/US 50 (Intersections #1 & #2)** and **White Rock Road/Latrobe Road (Intersection #3)**, were only analyzed for the PM peak.

- **Technical Inquiry:** How can the County ensure General Plan LOS compliance when the project's busiest operational hour was not modeled for the majority of the study area?

4. Infrastructure Obsolescence & Mainline Hazards

- **Temporary Signal Removal:** The TIA relies on a signal at **Silva Valley Parkway and Clarksville Crossing (Intersection #10)** that is categorized for future **removal** once Country Club Drive is extended.
- **Projected Mainline Backups:** SimTraffic analysis indicates that 95th percentile queues on **northbound Silva Valley Parkway** will reach **754 feet** in the Near-Term PM peak.
- **Conflict with Future Planning:** The TIA notes these queues extend **"almost to the westbound US-50 ramp intersection"**.
- **Technical Inquiry:** Has the County analyzed the cumulative hazard of adding **32,586 daily VMT** to a corridor that will experience significant construction-related detours and signal removals during the *suggested* **July 2027** extension of Country Club Drive?
- **Clarksville Crossing Access Hazard:** The site plan lacks dedicated **left-turn pockets** for southbound traffic entering the South Site warehouse. Without these, southbound vehicles will queue in active travel lanes, creating a primary safety hazard during peak Saturday hours, and other high customer activity times.
- **Technical Inquiry:** Will the County restrict **northbound left turns** from Clarksville Crossing onto Silva Valley Parkway north of the project site? If so, the FEIR must analyze the resulting "loop" traffic and U-turn maneuvers that will be forced onto Silva Valley Parkway.
- **Commercial Truck Turn radius analysis:**
 - Left and Right turn movement turn radius analysis **MUST** be required for the east and westbound **on and off ramps of the Silva Valley Pkwy US50 Interchange.**
 - Commercial Truck Turn radius analysis must be completed at **each of the project driveways on Silva Valley Pkwy and Clarksville Crossing.**
 - Commercial Truck Turn radius analysis must be completed at **White Rock Road and Clarksville Crossing.**
- **General Plan Transportation Element Policy TC-5b:** In commercial and research and development subdivisions, curbs and sidewalks shall be required on all roads. Sidewalks in industrial subdivisions may be required as appropriate. Roads adjacent to schools or parks shall have curbs and sidewalks. Considering the proximity to Oak Meadow Elementary School, and the nature of the proposed "temporary traffic signal" proposed at Silva Valley Pkwy and Clarksville Crossing, a permanent signalized intersection, complete with curbs and sidewalks, should be installed instead of the 'temporary traffic signal at Clarksville Crossing.'

Appendix A: Technical Data & Cross-Reference Table

The following table maps our concerns to specific DEIR/TIA data points:

Concern	Reference	Technical Finding
VMT Impact	DEIR 3.14-2	32,586 daily VMT (Significant & Unavoidable)
LOS Failure	TIA Table 2	LOS F at White Rock Rd/Valley View Pkwy
Cancer Risk	DEIR 3.2-4	11 in one million (Exceeds significance threshold)
Signage Variance	DEIR 2.5.1	Request for 1,294 sq. ft. of total signage
Backup Alarms	GP HS-4	Mandatory 5 dB reduction for tonal noises not applied.
School Proximity	TIA #9	65 feet from site boundary to Oak Meadow property line

APPENDIX B: Public Health, Air Quality, Specialized Meteorology, and Asbestos Mitigation

This appendix addresses the technical and programmatic failures in protecting sensitive receptors, specifically students and staff at **Oak Meadow Elementary School**, from toxic air contaminants (TACs) and **Naturally Occurring Asbestos (NOA)**.

1. Scientific Rebuttal: Inadequate Meteorological Baseline

The DEIR's dispersion modeling is fundamentally flawed because it relies on data from the **Sacramento Executive Airport**, which is located in flat, valley terrain.

- **Topographic Disconnect:** Per 40 CFR Part 51 Appendix W, meteorological data must be representative of the project site. The Sacramento data fails to account for the **foothill terrain** and **diurnal wind reversals** (upslope/downslope flows) unique to El Dorado Hills.
- **Pollutant Trapping:** The DEIR ignores the "cold air drainage" and **nighttime temperature inversions** documented in the Mountain Meteorology fundamentals. These conditions trap Benzene and DPM in low-lying areas, creating "hotspots" at Oak Meadow Elementary that generic valley models cannot detect.
- **Fumigation Risk:** The DEIR fails to model **morning fumigation events**, where solar heating mixes elevated pollutant plumes downward to the ground exactly as students arrive at school.
- **Technical Mandate:** APAC demands at least **one year of site-specific meteorological monitoring** to update the Health Risk Assessment (HRA).

2. Legal Deficiency: Failure to Connect "Bare Numbers" to Health Outcomes

Following the California Supreme Court's ruling in *Sierra Club v. County of Fresno (Friant Ranch)*, an EIR must substantively connect emission levels to specific human health consequences.

- **Missing Health Impact Analysis:** The DEIR provides "bare numbers" for NOx and PM emissions but fails to translate these into localized rates of asthma, respiratory illness, or cardiovascular issues for the students at Oak Meadow.
- **Non-Attainment Contribution:** The project area is in **non-attainment** for PM10 and PM2.5. The DEIR fails to provide ambient air quality modeling to determine if the project will cause new exceedances of health-based standards for NO2 or SO2.

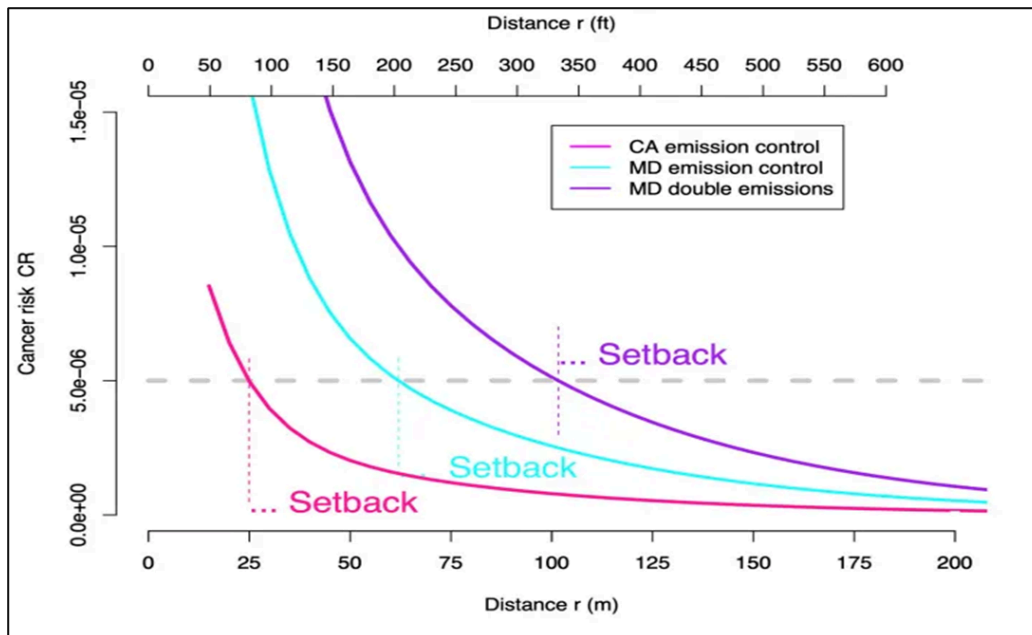
3. Naturally Occurring Asbestos (NOA) Inconsistencies

The DEIR provides conflicting information regarding the location and adequacy of NOA testing.

- **Survey Discrepancy:** Page 3.2-19 claims tests were negative on the South Site, yet Appendix E (Kleinfelder) shows test pits were *only* located at the North Site fuel station area.
- **Piecemeal Testing:** The **North Site Remainder Area** and the **South Site** have not been conclusively surveyed for NOA.
- **Deferred Mitigation:** Mitigation Measure 3.2-4b improperly defers the determination of NOA presence until after project approval. APAC demands a **comprehensive Geologic Evaluation** of the *entire* 43.26-acre site prior to certification.

4. Fuel Station Siting vs. State and Local Guidance

- **CARB Violation:** The California Air Resources Board (CARB) recommends a **300-foot buffer** for stations exceeding 3.6 million gallons/year. This project proposes **23 million gallons/year** but sits only **65 feet** from the school.
- **Idling Underestimation:** The DEIR assumes average idling times of only **1.04 to 1.45 minutes** per vehicle. Observed Costco operations suggest idling durations are closer to **5 minutes**, meaning the DEIR may have underestimated localized emissions by over 300%.
- **Location of Oak Meadow Elementary School and Costco Fuel Station:** Underestimated Emissions: A Study from ScienceDirect.com found that gasoline station vent pipes can emit 10 times more volatile organic compounds (VOCs) than commonly used in regulatory estimations, making current 300-foot setback regulations potentially inadequate.



5. Omission of Foreseeable Sensitive Receptors

- **Serrano Village A-14:** The DEIR fails to quantify impacts to the residents of Serrano Village A-14, which is currently under construction adjacent to the project.
- **Cumulative Construction Impact:** The EIR must analyze the overlapping construction activities (Dust, NOA, Noise) between Village A-14 and the Costco project, scheduled to begin in 2026.

6. Public Safety - Oak Meadow Elementary School

- **Pedestrian Permeability and Sensitive Receptors:** CEQA requires an analysis of impacts on "sensitive receptors" (schools). The project introduces a massive, high-turnover regional destination directly adjacent to a campus with "open" architecture (exterior-facing classroom doors). Considering the **OPEN CAMPUS** nature of Oak Meadow Elementary School, the DEIR fails to analyze how the physical proximity and

increased foot traffic from non-local visitors create a "land use conflict" that **compromises the safety and security of the student population.**

- **Inconsistency with General Plan Policy.** The General Plan mandates that the County prioritize "the safety of the County's residents" in land use decisions. The DEIR lacks an analysis of placing a high-intensity regional facility next to an open-access school is a fundamental inconsistency with the General Plan's safety goals.

Technical Comparison Table: Air Quality & Health

DEIR Claim	APAC Rebuttal Evidence	Legal/Scientific Citation
Meteorology	Sacramento Airport data is not representative of foothills.	40 CFR Part 51 App. W
Health Risks	Failed to connect "bare numbers" to specific illnesses.	<i>Friant Ranch (2018)</i>
Fuel Setback	65-foot buffer is 235 feet short of minimum guidance.	CARB Land Use Handbook
Idling Time	1.4-minute estimate is unrealistic for Costco queues.	Observed Industry Averages
NOA Survey	Test pits omitted the North Site Remainder and South Site.	Kleinfelder (2019/2024)

APPENDIX C: Operational Logistics and Tonal Noise Study

This appendix addresses the qualitative and quantitative noise impacts of daily warehouse operations, specifically focusing on the disruption caused by early-morning logistics and the "tonal" nature of safety equipment.

1. 2:00 a.m. to 7:00 a.m. Logistics Window

- **Incompatibility with Sensitive Receptors:** The project's delivery schedule designates the "Receiving Time" for the warehouse as occurring between **2:00 a.m. and 1:00 p.m.**
- **Nocturnal Disruption:** Most of the **10–12 warehouse truck deliveries** and **4–5 fuel tankers** occur before **10:00 a.m.**, placing the highest density of truck arrivals, idling, and air-brake releases during the most noise-sensitive hours for the community.
- **Technical Inquiry:** Did the noise model specifically evaluate the **sleep-awakening potential** (L_{\max} events) for residents at **R-SR 3 and 4** caused by heavy trucks arriving at 2:00 a.m.?. Average hourly noise levels (L_{eq}) fail to capture the impact of these instantaneous high-decibel events.

2. Failure to Apply Mandatory 5 dB Tonal Penalty

- **General Plan Standards:** Per El Dorado County General Plan Table **HS-4 (Note 1)**, the noise level standard must be **lowered by 5 dB** for simple tone noises or recurring impulsive noises.
- **Backup Alarms and Material Handling:** Delivery trucks and material handling equipment (forklifts, electric pallet jacks) utilize high-pitched, tonal backup alarms designed to be high-volume auditory signals.
- **Technical Inquiry:** Why does the DEIR not show a 5 dB reduction in the allowable noise threshold for these tonal sources?. Without this mandatory adjustment, the operational noise impacts are significantly underestimated.

3. Mitigation of Impulsive Logistics Noise

- **Alternative Safety Technology:** Broadband (white noise) backup alarms dissipate quickly and are less intrusive to neighbors while maintaining required safety standards.
- **Technical Inquiry:** Will the FEIR include a **Condition of Approval** requiring all on-site material handling equipment and contracted delivery vehicles to utilize **broadband "white noise" backup alarms** rather than tonal alarms?. Furthermore, will the applicant be required to implement a **"No Idle" policy** and utilize electric-only material handling equipment for all work performed between **10:00 p.m. and 7:00 a.m.**?

4. Delivery Vehicle Staging

- Has any analysis been conducted regarding the presence of the 10-12 warehouse commercial delivery vehicles arriving outside of delivery hours? Do adequate commercial vehicle parking areas exist in El Dorado Hills that would allow these commercial vehicles to park legally? Recently, tractor-trailer vehicle combos have been parked (and cited by CHP) in areas along the south side of White Rock Road just east of Valley View Parkway, as well as along Saratoga Way adjacent to Finders Way. Is it possible that these warehouse commercial delivery vehicles arriving outside of delivery hours might park along the roadways in the El Dorado Hills Business Park?

5. Truck Routing Enforcement

- **EDH APAC recommends** a formal **Truck Routing Plan** be established as a condition of the CUP, strictly prohibiting warehouse delivery trucks and fuel tankers from utilizing **Silva Valley Parkway north of the project site** to protect the school zone and residential corridors.
-

APPENDIX D: Project Discrepancy and Aesthetics Memo

This appendix highlights the fundamental contradictions between the project's stated qualitative objectives and the quantitative physical design specifications documented in the DEIR. The EDH APAC asserts that the proposed industrial-scale lighting and signage are incompatible with the "sensitive" design promised to the El Dorado Hills community.

1. Contradiction of Design Objectives

- **Stated Objective:** The project aims to be "**responsive to the El Dorado Hills area design context**" and "**sensitive to the adjacent community**".
- **Technical Reality:** The project proposes the installation of light poles reaching heights of **37 feet** and high-intensity illumination zones modeled at **5.0+ Foot-Candles (FC)**.
- **Technical Inquiry:** How can the County reconcile **37-foot-high** industrial-scale light poles with a "sensitive" suburban design context, particularly when residential property lines are located as close as **9 - 10 feet** from the project boundary?

2. Signage Variance (V22-0001) and Light Pollution

- **Proposed Scale:** The applicant is seeking a variance to allow a total of **1,294 square feet** of building-attached signage.
- **Impact on "Sky Glow":** This massive signage footprint, which includes a **175-square-foot** entry sign and four warehouse signs totaling **1,210 square feet**, will contribute significantly to nighttime light pollution and "sky glow."
- **Technical Inquiry:** Since the project site is currently vacant and provides no existing light sources, why has the County not required the project to adhere strictly to standard **CR-PD zoning** signage limits to mitigate the loss of "dark sky" character for the neighboring residents?

3. Loss of Natural Buffer (Heritage Oak Removal)

- **Natural Screening:** The site currently features a mature canopy that provides a natural visual and acoustic shield between US 50 and the surrounding residential areas.
- **Tree Removal:** The project will remove **13 protected oak trees**, including **three Heritage Trees** with diameters of 36 inches or greater.
- **Technical Inquiry:** Does the FEIR acknowledge that the payment of "in-lieu fees" to the **Oak Resources Management Plan (ORMP)** fails to mitigate the immediate loss of visual screening for existing residents? Will the County require on-site replanting of large-stature trees to specifically replace the screening lost by the removal of these Heritage Trees?
- **Incorporate By Reference:** EDH APAC wishes to incorporate by reference the March 16, 2026 **comment letter (Exhibit 1)** from EDH APAC Member Alastair Dunn regarding his analysis of the proposed oak tree mitigation, **Addendum II (Exhibit 2)** and **Oak**

Tree Avoidance ([Exhibit 3](#)) expressing a preference for avoidance of oak tree removal.

APPENDIX E: Evaluation of Project Alternatives (FEIR Mandate)

Per CEQA Guidelines Section 15126.6, an EIR must describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would **avoid or substantially lessen any of the significant effects**.

The EDH APAC and local residents formally request the Final EIR (FEIR) evaluate the following three alternatives specifically targeting the North Project Site to mitigate significant health and circulation impacts:

1. Reduced Capacity Fuel Facility Alternative (16 Pumps)

- **Project Objective vs. Impact:** While the applicant seeks to meet member demand for high-quality gasoline, the proposed 32-pump configuration results in a Significant and Unavoidable VMT impact and localized benzene "hotspots".
- **Impact Reduction:** This alternative would evaluate a 50% reduction in fueling positions. A 16-pump configuration may significantly decrease the volume of idling vehicles, reduce the frequency of fuel tanker deliveries (currently 4–5 per day), and lower the cumulative concentration of Toxic Air Contaminants (TACs) adjacent to Oak Meadow Elementary.

2. Southernmost Relocation of Fuel Facility (Within North Site)

- **Spatial Mitigation:** The current plan places the fuel facility property line just **65 feet** from the school.
- **Impact Reduction:** This alternative mandates moving the 13,000-square-foot fuel canopy to the **absolute southern boundary of the North Project Site**. Relocating the facility as far south as possible—near the shared signalized access point —would maximize the physical buffer to the school and residential receptors, utilizing the remaining 13.79 acres of the North Site as a safety and air-quality buffer.

3. No Fuel Station Alternative

- **Health and Safety Prioritization:** This alternative evaluates the development of the Warehouse on the South Site without any gasoline dispensing facility on the North Site.
- **Impact Reduction:** This is the only alternative that completely eliminates the risk of **Benzene fumigation events** and **Naturally Occurring Asbestos (NOA)** release specifically associated with the North Site fuel facility grading. It also drastically reduces the project's regional VMT draw.

APPENDIX F: Supporting Evidence Regarding Tribal Consultation and Clarksville Historic Setting

Section F.1: Regulatory Requirements for Tribal Consultation (AB 52)

- **Summary of Law:** Detail the requirement that the Lead Agency (El Dorado County) must begin consultation with tribes prior to the release of a DEIR if a tribe has requested it.
- **Missing Data Points:** A list of questions for the County:
 1. Which tribes were contacted, and on what dates?
 2. Did any tribes identify the project area as part of a larger Cultural Landscape?
 3. Why are there no specific Tribal Monitoring requirements included in the Mitigation Monitoring and Reporting Program (MMRP)?
 4. Has the County concluded AB 52 consultation, and if so, where is the summary of findings that justifies a 'Less Than Significant' impact without tribal-led mitigation?

Section F.2: Significance of the Clarksville Townsite

- **No Analysis of the Historic Clarksville Townsite:** Why was a project of this scale and regional intensity not evaluated for its impact on the 'integrity of setting' for the Clarksville Townsite?
- **Historical Context:** The Clarksville Townsite was a vital stop on the Carson Emigrant Trail and the Lincoln Highway.
- **Proximity Analysis:** * **North Site Warehouse:** ~1,200 feet distance.
 - **South Site Fuel Station:** ~1,300 feet distance.
- **Potential Indirect Impacts to be Evaluated:**
 - **Vibration:** Impact of constant heavy delivery vehicles (post-midnight to 8:00 AM) on any remaining historic foundations or cellars.
 - **Atmospheric/Visual:** How the "glow" from the 13,000 sq. ft. fuel station canopy alters the historical nighttime setting of the townsite.
 - **Noise:** Impact of the tire center and loading docks on the quietude required for a historic interpretive site.
- **Vibration Study:** Will the County require a specific Vibration Study to ensure heavy-duty truck traffic along Silva Valley Parkway does not impact the structural integrity of the Clarksville ruins?

Section F.3: Map of Proximity



APPENDIX G: Urban Decay Analysis

The purpose of this review is to assess the economic impacts of a proposed Costco warehouse store and fuel facility in El Dorado Hills. The review estimates the potential impacts of the Project on existing retailers in the market area pursuant to diverted sales from existing retailers and the extent to which may or may not contribute to urban decay from potential store closures attributable to existing retailer sales diversions. The Draft EIR only references SECTION 6.4 CIP cost benefit.

However, we note that in Costco warehouse DEIRs in the following locations were also required to address the fiscal impacts to the county.

- Ukiah, California (2013): A full fiscal impact analysis impacting the General Fund and other revenue sources.
- Elk Grove, California (2022): A staff report examining the project's agreement and financial impact.
- San Diego (2015): A report compliance with regulations to minimize adverse impacts on the surrounding area.
- Chino Hills (2017): A fiscal impact review, including traffic management and mitigation measures (MM-TRAF-1).
- Vineyard II Retail Project (2020): A traffic impact analysis.

Accordingly, a fiscal impact study, as the one done in Ukiah, should be undertaken for El Dorado Hills.

In this regard APAC Members have identified a concern beyond the scope of the above two studies.

We note that the capital improvements likely required to mitigate the growth inducing effects particular to this site –mainly transportation - shall undoubtedly be in the millions of dollars. Traffic Mitigation Fees are spread countywide. Fiscal Impact studies focus on tax revenues generated by Costco warehouse for the benefit of the General Fund. All these are externalities.

We find that there is no nexus study addressing the benefits (TIF Fees and Tax revenues) generated are borne locally by EDH community, while the costs are borne locally. This nexus can be evaluated by adhering to the technical requirements of a cost / benefit analysis that shall require an itemized and costed project related capital improvements and how this requirement shall be funded.

APAC members believe this imbalance must be addressed so that the community - and Board of Supervisors - may address the “benefits and burden” directly related to this project.

EDH APAC appreciates the opportunity to review and provide feedback regarding proposed development projects in El Dorado Hills

John Davey

Chair

El Dorado Hills Area Planning Advisory Committee

“Non-Partisan Volunteers Planning Our Future Since 1981”