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1. Vehicle Miles Traveled (VMT)

The DEIR identifies VMT impacts as **Significant and Unavoidable**.

- **Net Increase**: The Costco project is projected to result in a net increase of **21,123 daily VMT**.
- **Cumulative Impact**: Future development of the North Site Remainder Area adds another **11,462 VMT**, for a combined total of **32,586 daily VMT**.
- **Findings**: The analysis concludes that while mitigation (commute reduction programs, pedestrian improvements) helps, it cannot reduce the impact below the County's "no net increase" threshold because the Costco business model is inherently auto-oriented.
- **Location in DEIR**: Section 3.14.3, pages 3.14-13 through 3.14-16.

2. Level of Service (LOS) & General Plan Consistency

While CEQA now uses VMT as the primary metric for environmental impact, the DEIR still addresses consistency with the County General Plan's LOS policies (TC-Xd, TC-Xe, and TC-Xf) as an operational matter.

- **Required Improvements**: To address these policies, the project must:
    - Install **150-foot dual northbound left-turn lanes** at the Silva Valley Parkway and project driveway intersection.
    - Improve the **White Rock Road and Valley View Parkway-Vine Street** intersection by adding a northbound right-turn lane and increasing westbound left-turn storage.
- **Location in DEIR**: Section 2.4, page 2-37.

3. Access Points & Circulation Patterns

A major point for your committee regarding the "temporary" nature of access concerns the interaction with the future **Country Club Drive extension**.

- **Current Plan**: Primary access is a new signalized intersection on **Silva Valley Parkway** shared by the North and South sites.
- **The "Temporary" Issue**: A traffic signal will be installed at Silva Valley Parkway and **Clarksville Crossing**. However, the DEIR states that when the County extends Country Club Drive, this connection and the signal **will be removed**.
- **North Site Specifics**: A secondary right-in/right-out driveway north of the main signal is proposed for the fuel facility. Fuel delivery trucks are expected to enter here and exit at the main signal.
- **Location in DEIR**: Section 2.3.1 (North) and 2.3.2 (South), pages 2-7 and 2-24.

4. Delivery Vehicle Impact & Routing

The warehouse anticipates **10 to 12 truck deliveries per day**, with receiving hours typically between **2:00 a.m. and 1:00 p.m.**.

- **Designated Truck Routes**: The DEIR specifies routes to avoid northern residential areas and schools:
    - US 50 to Silva Valley Parkway
    - Clarksville Road to White Rock Road
    - Future Country Club Drive extension.
- **Fuel Deliveries**: The fuel facility expects **4 to 5 truck deliveries per day**, staged north of the canopy.
- **Location in DEIR**: Section 2.3.2, page 2-36.

5. Pedestrian and Bicycle Circulation

- **Improvements**: Costco is required to construct sidewalks along its frontage on **Clarksville Crossing** and **Silva Valley Parkway**.
- **School Connectivity**: A specific requirement is to construct sidewalks north of the project on the east side of Silva Valley Parkway to connect to the existing sidewalk near **Oak Meadow Elementary School**.
- **Location in DEIR**: Mitigation Measure 3.14-2b, page 3.14-16.

Additional Potential Concerns for EDH APAC

In my review of the document, you may also want to flag these related transportation items:

- **Emergency Access**: The DEIR notes that the access road on the east side of the structure is reduced to **15 feet** due to topography, which required special acceptance from the Fire Department.
- **Construction Hazards**: A **Traffic Control Plan** is required for work in the public right-of-way (encroachment permits), especially given the proximity to the elementary school.
- **Vibration**: If pile driving is used during future development of the North Site Remainder Area, it could exceed annoyance thresholds for nearby structures.

Applicant's Stated Circulation & Travel Objectives

The following objectives are identified by Costco as the underlying purpose of the project:

- **Convenience**: Provide a location that is convenient for members, the community, and employees to travel to for shopping and work.
- **Conflict Minimization**: Minimize circulation conflicts between automobiles and pedestrians.
- **Fuel Demand**: Meet member demand for high-quality gasoline at a fair price via a new Fuel Facility.

- **Infrastructure Efficiency**: Develop land that is adequately served by existing infrastructure, including roadways.

Detailed Roadway & Access Point Analysis

The DEIR outlines several specific circulation changes that may impact your committee's concerns regarding the permanent versus temporary nature of the north parcel access:

Feature	Details in DEIR	Location
Main Signalized Access	A new signalized intersection on **Silva Valley Parkway** will serve as the primary shared entrance for both the North and South sites.	Page 2-7, 2-24
Secondary North Access	A secondary **right-in/right-out driveway** is proposed north of the main signal on the North Site specifically to separate fueling operations from primary traffic.	Page 2-7
Temporary Signal	A signal will be installed at **Silva Valley Parkway and Clarksville Crossing**. However, this signal and the physical connection **will be removed** when the County extends Country Club Drive.	Page 2-24
Fuel Delivery Staging	Fuel delivery trucks are intended to enter via the northern driveway and exit at the main signalized intersection to allow for safe left turns.	Page 2-7

Specific Impact Locations Detail

The DEIR provides data on the following segments your committee is tracking:

- **Silva Valley Parkway**: This segment experiences the highest increase in project-related noise. Specifically, the segment between the US 50 Westbound Ramps and the future Country Club Drive is noted for a modeled noise increase of **1.5 to 2.1 dBA**.

- **Clarksville Crossing**: This local roadway will provide three direct driveways to the South Site. It currently lacks pedestrian facilities.
- **White Rock Road & Valley View Parkway**: A significant operational improvement is required here, including an additional **northbound right-turn lane** and increased **westbound left-turn storage**.
- **US 50 Interchanges**: Traffic noise modeling identifies US 50 Eastbound (east of the interchange) as a high-noise area, reaching **70.5 dBA L_{dn}** under existing conditions.

Concerns for Review

1. **VMT and Access Alignment**: The DEIR labels the VMT impact as "Significant and Unavoidable". Your committee may want to argue that a permanent northern access at the **future Country Club Drive alignment** (rather than a temporary signal at Clarksville Crossing) would better serve the "Conflict Minimization" objective and potentially optimize travel paths.
2. **Pedestrian Safety**: While Mitigation Measure 3.14-2b requires sidewalks , the DEIR acknowledges that the Costco business model makes walking or biking trips "impractical" due to bulk purchasing.

Cumulative Context of Country Club Drive

The DEIR identifies the extension of Country Club Drive as **County Capital Improvement Project No. 36105008**. Importantly, it is treated as an independent project proposed and undertaken by the County, not as part of the Costco project for analysis purposes.

Key findings regarding long-term traffic flow and the extension include:

- **Removal of Current Access**: In the future, when the County constructs the extension, the connection between **Clarksville Crossing and Silva Valley Parkway** will be physically removed.
- **Signal Decommissioning**: The traffic signal proposed for the Silva Valley Parkway/Clarksville Crossing intersection is also designated for removal upon the extension's completion.
- **Routing Shift**: Delivery truck travel routes are planned to eventually use the future Country Club Drive extension west of the South Site to access Clarksville Road.
- **Construction Timing**: The extension is currently suggested to start construction in **July 2027**. This potentially overlaps with the projected construction of the North Site Remainder Area.

- **VMT Mitigation Conflict**: The DEIR states that even with employee commute programs, the primary source of VMT is "auto-oriented" warehouse shopping. A permanent, optimized northern access could be framed as a necessary long-term

measure to minimize the "impracticality" of non-auto trips and ensure the objective of **Convenience** for the community is met permanently, rather than temporarily.
- **Safety and Hazards**: The DEIR concludes that the project will not substantially increase hazards because plans are subject to County review for "applicable design standards". Your committee could argue that a "temporary" intersection which is slated for removal creates a future "geometric design feature" hazard or unnecessary circulation conflict when the transition occurs.
- **Infrastructure Efficiency**: One project objective is to develop land "adequately served by existing infrastructure". Your committee might question if relying on a temporary signal at Clarksville Crossing — only to remove it — meets the standard of "efficient expansion" of the delivery system.

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6. Analysis of VMT vs. Project Objectives

The DEIR acknowledges a significant conflict between the project's auto-oriented nature and the County's VMT reduction goals. This data may support an APAC argument for a more permanent, optimized northern access point at the outset.

- **VMT Magnitude**: The project generates a net increase of **21,123 daily VMT**.
- **Impracticality of Alternatives**: The DEIR explicitly states that because members purchase in bulk, walking, biking, or transit trips to the warehouse are **"impractical"**. However, the DEIR offers that potential employees *might* commute via biking or transit trips. There are currently no Public Transit options scheduled in the community
- **Convenience Objective**: One of Costco's stated objectives is to provide a location **"convenient for its members"** to travel to for shopping.
- **APAC Observation**: If alternative modes are "impractical" and the project is inherently "auto-oriented," relying on a **temporary** signal at Clarksville Crossing (to be removed later) potentially undermines the objective of long-term convenience and efficient infrastructure.

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7. Long-Term Impacts: Country Club Drive Extension

The DEIR treats the extension as an independent County project (CIP No. 36105008) but acknowledges its profound effect on the project's final circulation pattern.

- **Access Removal**: Upon completion of the extension, the connection between **Clarksville Crossing and Silva Valley Parkway**—and the associated traffic signal—will be **removed**.
- **Future Truck Routing**: Delivery trucks are eventually expected to use the Country Club Drive extension to access Clarksville Crossing
- **North Site Interaction**: The extension will occupy a portion of the North Site near its northern edge.

- **Construction Overlap**: Construction of the extension is currently *suggested* to begin in **July 2027**.
- **Location in DEIR**: Section 2.3.1 (page 2-7); Section 2.3.2 (page 2-24); Section 3.14.3 (page 3.14-11).

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8. Localized Noise & Vibration Impacts

The following data points detail the impact on the Silva Valley Parkway corridor and receptors near the North Site.

Construction Noise

- **Daytime Levels**: Hourly construction noise at the nearest sensitive receptors is modeled to reach **72.6 dBA L_{eq}**.
- **North Site Proximity**: The loudest daytime activities (silent blasting/hoe ramming) will generate **68.5 dBA L_{eq}** at the property lines of residences near Village Green Drive.
- **School Impact**: Construction noise at Oak Meadow Elementary School is modeled at **66.4 dBA L_{eq}**. Interior levels are estimated at **44 dBA L_{eq}**, which is below typical speech levels, assuming standard 20 dBA exterior-to-interior attenuation.

Operational Traffic Noise

- **Substantial Increase Thresholds**: The DEIR identifies two roadway segments where project traffic will exceed the County's "substantial increase" threshold:
    - **Silva Valley Parkway** (between US 50 WB Ramps and future Country Club Drive).
    - **White Rock Road** (between US 50 EB Ramps and Clarksville Crossing).
- **Finding**: While the increase is modeled at **1.5 to 2.1 dBA**, the DEIR concludes the impact is less than significant because there are **no existing sensitive receptors** directly along these specific frontage segments.

Vibration

- **North Site Remainder Area**: Future development of the remaining 13.79 acres could require **pile driving**, which would exceed structural damage thresholds (0.25 in/sec PPV) within **84 feet** and annoyance thresholds (80 VdB) within **293 feet**.
- **Finding**: This is a **Significant Impact** requiring a Vibration Control Plan.

This table synthesizes the "hot spots" of concern by combining data from the **Project Description**, the **Noise and Vibration** analysis, and the **Transportation** sections of the DEIR.

Silva Valley Parkway: Segments and Corresponding Impact Data

Roadway Segment	Daily VMT Contribution	Modeled Noise Increase (Weekday)	Key Receptor(s) / Specific Concerns	DEIR Page Reference(s)
Silva Valley Pkwy: North Site Frontage (from Clarksville Crossing to North/South Site Access)	Part of 32,586 total Project VMT	**+0.6 dBA**	**Fuel Facility Access**: Primary ingress/egress for members-only gas station.	3.11-29, 3.14-11
Silva Valley Pkwy: South Site Frontage (from North/South Access to Tong Road)	Part of 32,586 total Project VMT	**+1.5 dBA**	**Substantial Increase**: Exceeds the 1.5 dBA threshold for segments with existing noise levels > 65 dBA.	3.11-29, 4-19
Silva Valley Pkwy: Local Access (from Tong Road to US 50 WB Ramps)	Part of 32,586 total Project VMT	**+1.5 dBA**	**Truck Deliveries**: Primary route for 10–12 warehouse trucks and 4–5 fuel tankers daily.	2-36, 3.11-29

Silva Valley Pkwy: School Zone (Entrada Dr to Oak Meadow Elementary)	Part of 32,586 total Project VMT	**+0.5 dBA**	**Safety Hot Spot**: Construction noise is modeled at 66.4 dBA L_{eq} at the property line.	3.11-22, 3.14-11

Analysis of Concerns

- **Noise Impact Paradox**: While the DEIR identifies two segments of Silva Valley Parkway and White Rock Road where traffic noise will exceed the County's "substantial increase" threshold (Impact 3.11-2), it simultaneously concludes this is **Less Than Significant** because no "existing sensitive receptors" are located directly on those frontage segments. The cumulative increase for users of the future **Country Club Drive extension** should be factored into this "significant" finding.
- **VMT vs. Local Service**: The total project-generated VMT (including the North Site Remainder Area) of **32,586 daily miles** is cited as the reason why the impact is "Significant and Unavoidable". Silva Valley Parkway currently measures at **LOS A**—the best possible level - this project represents a massive shift from local service to a regional auto-oriented draw.
- **Impracticality of Mitigation**: The DEIR admits that the Costco land use and business model is inherently auto-oriented, making walking, biking, or transit trips **"impractical"**. This admission strengthens APAC's concern for a permanent, high-capacity access point at the **Country Club Drive alignment** now, rather than a temporary signal at Clarksville Crossing.

Statement of Concern: Transportation and Circulation

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Costco Wholesale project. While we recognize the project’s intent to serve the local community and contribute to the County’s tax base, the DEIR reveals critical deficiencies and "Significant and Unavoidable" impacts within the Transportation and Circulation element that demand more robust mitigation and design reconsideration.

Primary Areas of Concern

- **Significant and Unavoidable Regional Impact**: The DEIR concludes that the project, including the North Site Remainder Area, will result in a net increase of **32,586 daily Vehicle Miles Traveled (VMT)**. The analysis explicitly admits that typical mitigation measures—such as commute marketing and bicycle facilities—are largely "impractical" given the inherently auto-oriented nature of the Costco business model.
- **Infrastructure Obsolescence by Design**: A central concern for APAC is the proposal for a **temporary connection and traffic signal** at Silva Valley Parkway and Clarksville Crossing. The DEIR states this infrastructure will be **removed** upon the future extension of Country Club Drive (CIP No. 36105008). We find the reliance on temporary, high-impact signals to be a failure of long-range infrastructure planning.
- **Access Misalignment**: Given the "Significant and Unavoidable" VMT findings, APAC strongly advocates for a **permanent northern access point** to be constructed at the onset, aligned with the future Country Club Drive extension. A permanent solution at the north parcel is necessary to fulfill the applicant's own objective of "minimizing circulation conflicts" and providing "convenient" travel for members and employees.
- **Operational Noise and Community Health**: The DEIR identifies that project-generated traffic will result in **"Substantial Increases"** in noise along Silva Valley Parkway and White Rock Road. Furthermore, nighttime construction (concrete pours) on the South Site is projected to increase noise levels by **5.3 to 6.5 dBA** at nearby residences, creating significant risks for sleep disruption.
- **Sensitive Receptor Safety**: With four public school sites located along the Silva Valley Parkway corridor—including Oak Meadow Elementary immediately adjacent to the North Site —the introduction of **10–12 daily warehouse trucks and 4–5 fuel tankers** necessitates a more permanent and safe circulation plan than what is currently proposed.

Conclusion

The EDH APAC believes that approving a project of this regional scale based on "temporary" access points is a major oversight. We request that the Final EIR provide a detailed analysis of a permanent access solution at the Country Club Drive alignment to mitigate long-term circulation conflicts and provide a safer environment for the El Dorado Hills community.

Economic Impact and Urban Decay Analysis

Market Area and Consumer Behavior

The analysis defines a broad market area extending from the western El Dorado County boundary through a major portion of **Amador County**. This wide geographic reach helps explain the high VMT figures, as the project is intended to capture regional demand.

- **Regional Sales Attraction**: The study estimates total project retail sales at approximately **$297 million** annually.
- **Trip Consolidation**: Of these sales, **84%** are estimated to come from retail consumers and **16%** from wholesale business members.
- **Leakage Capture**: The market area currently experiences "leakage" (residents spending money outside the area) in categories like clothing, home furnishings, and food services. The study suggests Costco will "recapture" this spending locally.
- **Multi-Purpose Trips**: The report argues that Costco shoppers often consolidate multiple needs into a single trip (e.g., optical exams, groceries, and fuel), which may lead to fewer total retail trips per month for members.

Impact on Existing Local Retailers

The "Urban Decay" analysis specifically examines whether the Costco project will force existing stores to close, leading to physical blight.

Sector	Number of Competitors	Estimated Sales Impact	Study Conclusion
Grocery / Food	28 Stores	2.5% to 7.5%	**No Closures Expected**: Costco's focus on bulk items and limited selection differs from traditional "convenience-oriented" grocery shopping.
Fuel / Gas Stations	47 Stations	2.9% to 7.9%	**No Closures Expected**: Existing stations offer 24/7 service and amenities (car washes, repair) that the Costco fuel facility will not provide.

1. **Recaptured Trips**: The study admits that **8%** of local household spending currently "leaks" out of the county. If the project captures these trips locally, the net increase in **regional** VMT might be overstated, as residents are already driving those miles elsewhere (e.g., to Folsom or Sacramento).
2. **Trip Substitution**: The report notes that existing members currently traveling to the **Folsom Costco** (4 miles away) will likely shift their trips to the new El Dorado Hills site. The analysis calculates a reduction of **-9,830 daily VMT** from trips shifting from Folsom, which partially offsets the new demand.
3. **Wholesale vs. Retail**: Since **16%** of sales are wholesale, these trips often involve larger vehicles and different peak hours. Has VMT analysis properly weighted the lower frequency of wholesale business trips compared to daily retail consumers.

Request for Clarification: Infrastructure & Long-Term Circulation

EDH APAC requests detailed clarification on the following points regarding the proposed "temporary" traffic signal at the intersection of **Silva Valley Parkway and Clarksville Crossing** and its relationship to the **Country Club Drive extension** (CIP No. 36105008):

1. Signal Decommissioning Timeline

- **Trigger for Removal**: The DEIR states that the signal at Silva Valley Parkway and Clarksville Crossing will be **removed** when Country Club Drive is extended. What specific funding or construction milestone for CIP No. 36105008 triggers this removal?
- **Operational Gap**: Given that the Country Club Drive extension is estimated to begin construction in **July 2027**, while the Costco project is anticipated to be operational in **mid-2027**, will the community be subjected to major intersection reconfigurations within months of the store's grand opening?

2. Final Circulation Integrity

- **Access for the North Parcel**: Currently, the fuel delivery trucks are expected to enter through a northern driveway and exit at the main signalized intersection. If the Clarksville Crossing signal is removed, will this force additional U-turn maneuvers or secondary "loops" on Silva Valley Parkway for fueling patrons and delivery tankers? Shouldn’t the northern driveway be constructed to utilize the suggested Country Club Drive extension?
- **"Impractical" Alternative Modes**: Since the DEIR admits that alternative transportation modes are **"impractical"** due to the auto-oriented business model , how does the County justify a temporary access plan that creates potential geometric hazards once the signal is removed?

3. Alignment with Project Objectives

- **Infrastructure Efficiency**: One stated objective is to develop land **"adequately served by existing infrastructure"**. How does a plan requiring the installation and subsequent demolition of a major signalized intersection meet the standard of efficient infrastructure expansion?
- **Minimizing Conflicts**: How will the County ensure the objective to **"minimize circulation conflicts between automobiles and pedestrians"** is met during the multi-year transition from the "temporary" signal to the "final" Country Club Drive alignment?

Aesthetics and Lighting: Impact on the Silva Valley Parkway Corridor

In addition to circulation, EDH APAC is has concerns regarding the scale of the lighting and signage, which could alter the community character:

- **Lighting Standards**: The project proposes LED light poles reaching heights of **36.6 to 37 feet**. These will be visible from the single-family residences near Village Green Drive and Oak Meadow Elementary School.
- **Signage Variance (V22-0001)**: The applicant is requesting a **variance** to allow **1,294 square feet** of total signage. This includes a **175-square-foot** sign on the warehouse entry and four signs on building elevations totaling **1,210 square feet**, which exceeds the standard maximum for the CR zone.
- **Fuel Facility Prominence**: The fuel facility will feature a **13,000-square-foot** steel canopy. The DEIR admits that while design elements help, implementation will alter views by adding "built-environment elements onto undeveloped land".

Nighttime Environment and Light Spillover

The EDH APAC is concerned that the project's lighting plan will fundamentally alter the nighttime character of this residential and school-adjacent corridor. While the DEIR states that all fixtures will include cutoff lenses to reduce spillover, the scale and intensity of the proposed illumination represent a significant new source of light in a currently vacant area.

1. Physical Scale of Lighting Infrastructure

- **Pole Heights**: The project proposes LED fixtures mounted on poles ranging from **25 to 37 feet** in height.
- **Elevation Issues**: On the South Site, poles reach up to **36.6 feet**. Given the hillside topography, these elevated sources may project light significantly further than modeled, particularly toward the **residences near Mertola Drive** and **Village Green Drive**.

2. Analysis of Foot-Candle Intensity (Figure 3.1-12)

According to the lighting plan and extent of illumination shown in **Figure 3.1-12**, the following intensities are projected:

- **High-Intensity Zones**: The area immediately surrounding the fuel facility and the warehouse entrance is modeled at **5.0+ Foot-Candles (FC)**.
- **Transition Zones**: Extensive portions of the parking lots are modeled between **1.0 FC and 5.0 FC**.
- **Edge of Property**: While the DEIR intends for light to diminish to **0 FC - 0.25 FC** at the property lines , the proximity to residential property lines—as close as **9 to 10 feet** for R-SR 3 and R-SR 4—leaves zero margin for error in fixture orientation or maintenance.

3. Duration of Impact and School Proximity

- **Fuel Facility Operating Hours**: The fuel facility is proposed to operate from **5:00 a.m. to 10:00 p.m.** daily. This ensures the area is illuminated during the early morning and late evening hours when ambient noise and light in the surrounding residential neighborhoods are at their lowest levels.
- **Impact on Oak Meadow Elementary**: The school property line is only **65 feet** from the project site. EDH APAC is concerned about the impact of "sky glow" and high-intensity lighting on a site dedicated to children and learning, particularly during evening school events or early-morning arrivals.

4. Variance Request (V22-0001)

The applicant is seeking a **variance** to exceed standard building-attached signage area. The total proposed signage is **1,294 square feet**, including four signs on the fuel canopy totaling **84 square feet**. These large, illuminated corporate symbols will serve as a constant source of light pollution that exceeds the standard commercial zoning regulations intended to protect El Dorado Hills' community character.

Public Health and Air Quality: Focus on Oak Meadow Elementary

The DEIR identifies significant health risks related to construction and operation that directly affect the school and nearby residents.

- **Public Health Risks**: The Health Risk Assessment (HRA) concluded that without mitigation, construction and operation of the Costco project would result in a maximum cancer risk of **11 in one million** for residential receptors.
- **Proximity to School**: Oak Meadow Elementary is located immediately adjacent to the North Site, with the property line just **65 feet** from the project boundary. The "Other Sensitive Receptors" category (which includes the school) showed an unmitigated cancer risk of **9.1 in one million**.
- **Naturally Occurring Asbestos (NOA)**: The project site is adjacent to areas where NOA has been identified. Construction activities, including grading and "silent blasting" on the North Site, could result in the airborne release of NOA, posing a significant health risk to students and staff.
- **Mitigation Requirement**: To reduce these risks, the DEIR requires **Tier 4 Final emission standards** for off-road equipment and a formal **Asbestos Dust Mitigation Plan**.

Biological Impacts and Loss of Natural Shielding

The conversion of this vacant land into a regional retail center involves the removal of significant natural features that currently serve as a buffer for the community.

- **Tree Removal**: The project will remove a total of **13 protected oak trees**, including **three Heritage Trees** (defined as native oaks with a diameter of 36 inches or greater).
- **Habitat Conversion**: Implementation requires the removal of **0.35 acres of valley oak woodland** and the fill of **wetland habitats**.
- **Loss of Visual Buffer**: These trees currently provide a natural screen between the existing residential neighborhoods and the US 50 corridor. Their removal, combined with the 37-foot light poles, will significantly increase the project's visual "intrusion" into the community.

Resident Public Health and Air Quality Contributions

1) Naturally Occurring Asbestos surveys and mitigation measures are insufficient.

The project site lies within a mapped Naturally Occurring Asbestos (NOA) Review Area. NOA poses significant health risks when disturbed, as microscopic fibers can become airborne and inhaled. Exposure to airborne asbestos fibers is associated with serious diseases including lung

cancer and mesothelioma. Because asbestos fibers persist in lung tissue and disease latency can exceed several decades, regulatory agencies require careful evaluation and mitigation where NOA may be present.

The DEIR is inconsistent regarding which side (North or South) of the project area was surveyed. Page 3.2-19 of the DEIR states that the geotechnical reports by Kleinfelder (2019 and 2024) evaluated NOA and gathered samples within the South site for testing and the results were negative for NOA minerals. However, Figure 2 on page 98 of 253 of Appendix E, i.e. Kleinfelder (2019 and 2024), shows that test pits were all located at the gas station location in the North site and no test pits were on the North Site Remainder Area or the South site. Because the DEIR appears to indicate different locations for the test pits, the record does not clearly establish where the NOA investigation occurred. CEQA requires that environmental baseline conditions be accurately described.

Whether the survey was done in the North or South site, the DEIR indicates that the NOA was only surveyed on one side of the project area and therefore the results are insufficient. The survey needs to be performed for the entire project area, including both the South and North sites, including the North Site Remainder Area.

In addition, Mitigation Measure 3.2-4b requires preparation and submission of an Asbestos Dust Mitigation Plan “if the presence of NOA is confirmed”. This appears to defer key mitigation requirements until a later determination of whether NOA is present. CEQA requires that mitigation measures be specific, enforceable, and capable of reducing impacts to a less-than-significant level. Because the presence of NOA has not been conclusively evaluated across the entire project area, the measure improperly defers the determination of whether mitigation is required. In addition, it’s unclear who is responsible to confirm whether NOA is present. However, under 17 CCR § 93105, specifically the Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, a professional survey or "Geologic Evaluation" is required to determine the presence of NOA at a project site. Mitigation Measure 3.2-4b needs to be modified to require a professional survey or "Geologic Evaluation" of the whole project site to determine the presence of NOA prior to project approval.

In addition, the detailed measures for the Asbestos Dust Mitigation Plan should be listed in Mitigation Measure 3.2-4b and the effectiveness of each measure should be analyzed in the DEIR to show how NOA impacts would be mitigated to less than significant. Moreover, the project should be required to conduct monitoring of airborne asbestos concentrations at representative locations at Oak Meadow Elementary School and nearby residences to ensure that any potential exposures are detected and avoided.

2) Impacts to the Serrano Village A-14 were not quantified.

The DEIR analyzes impacts to existing sensitive receptors but does not quantify impacts to Serrano Village A-14, which is currently under construction and will include residences adjacent

to the project. Because these homes are reasonably foreseeable sensitive receptors during the project's operational lifetime, CEQA requires that potential impacts to these future residents be evaluated.

3) Cumulative impacts from overlapping construction activities between the Serrano Village A-14 and the proposed project need to be evaluated.

Serrano Village A-14 is currently under construction, and the proposed project is expected to begin construction in summer 2026. Because these construction activities are likely to occur concurrently, the EIR should analyze the potential cumulative impacts resulting from the overlap.

The DEIR failed to evaluate the localized concentrations of criteria air pollutants at nearby sensitive receptors.

The CEQA checklist established by Cal. Code Regs., tit. 14, Div. 6, Ch. 3, Appendix G, Air Quality requires the EIR to analyze whether the project would expose sensitive receptors to substantial pollutant concentrations. Pollutants of concern include both toxic air contaminants (TACs) and criteria air pollutants.

The DEIR includes a health risk assessment for TACs, discussion of naturally occurring asbestos (NOA), and a screening analysis for carbon monoxide hotspots. The DEIR also compares the project's emissions to significance thresholds from the El Dorado County Air Quality Management District (EDCAQMD) CEQA Guide (2002). However, the DEIR does not evaluate the potential localized air quality impacts associated with emissions of criteria air pollutants, including CO, PM10, PM2.5, NO2, and SO2.

The California Supreme Court's 2018 decision in Sierra Club v. County of Fresno (Friant Ranch) established several key legal requirements for CEQA analysis. Most importantly, the Court held that an EIR cannot simply provide "bare numbers" (e.g., "the project will emit 100 tons of NOx per year"). It must make a "reasonable effort" to substantively connect those emission levels to specific health consequences, such as increased rates of asthma, respiratory illness, or cardiovascular issues, particularly for sensitive receptors. Per this ruling, lead agencies should move away from simple "significance threshold" checkboxes and instead analyze how project-level emissions would contribute to existing regional health burdens in non-attainment areas.

The air basin in which the project is located is classified as nonattainment for the PM10 and PM2.5 ambient air quality standards (AAQS). The project would therefore contribute to existing regional exceedances of the PM standards. An ambient air quality impacts modeling analysis is required to determine whether the project's emissions during construction and operation would contribute significantly to the existing exceedances of the PM10 and PM2.5 AAQS.

Similarly, an ambient air quality impacts modeling analysis is also required to determine whether the project's emissions during construction and operation would cause any new exceedance of the health based ambient air quality standards for CO, NO2, and SO2 to determine whether the project would expose sensitive receptors to substantial pollutant concentrations.

By relying solely on emissions totals and significance thresholds without evaluating localized pollutant concentrations, the DEIR does not fully address the potential health impacts of project emissions on nearby sensitive receptors.

5) The meteorological data from Sacramento Executive Airport are not representative of conditions at the project site.

Under the 40 CFR Part 51 Appendix W (Guideline on Air Quality Models), meteorological data used in dispersion modeling must be representative of the conditions governing plume transport and dispersion at the project site. Appendix W emphasizes the importance of spatial representativeness, including factors such as proximity of the meteorological station to the source, similarity of terrain and surface characteristics, similarity in exposure to prevailing winds, and adequate temporal coverage.

The project site is located in foothill terrain where local topography may influence wind flow patterns and pollutant dispersion. In complex terrain, wind fields can vary significantly over relatively short distances due to terrain-induced channeling, slope flows, and nighttime drainage winds. For example, daytime upslope flows may transport emissions toward nearby receptors (such as from the gas station to the Oak Meadow Elementary School) located upslope, while nighttime temperature inversions and drainage flows may trap pollutants in low-lying areas.

The Sacramento Executive Airport met station is located in flat terrain. The terrain and surface characteristics at that location differ substantially from those at the project site. Therefore, the meteorological data obtained from the Sacramento Executive Airport would not be representative of the project site. And the project impacts to the Oak Meadow Elementary School and nearby residences may have been underestimated using the meteorological data obtained from the Sacramento Executive Airport.

Appendix W recommends that at least 1 year of site-specific meteorological monitoring is preferred when terrain strongly influences wind patterns. Given the complex terrain near the project site and the proximity of sensitive receptors such as Oak Meadow Elementary School, the applicant needs to be required to conduct at least 1 year of meteorological monitoring and then use the collected data to update the health risk assessment and the ambient air quality modeling mentioned above.

6) The ambient air quality monitoring data used in the DEIR may not adequately represent conditions at the project site.

The 40 CFR Part 51 Appendix W (Guideline on Air Quality Models) recommends that background air quality data used in air quality analyses be representative of conditions in the project area. Monitoring stations should generally reflect similar source influences, terrain characteristics, and atmospheric conditions as those affecting the project site.

Table 3.2-4 of the DEIR (page 3.2-18) uses ambient air quality monitoring data from the Folsom–Natoma Street, Roseville–North Sunrise Avenue, Sacramento–Del Paso Manor, and Sacramento–Bercut Drive monitoring stations to characterize baseline conditions. However, the DEIR does not explain how these monitoring locations are representative of the conditions at the project site. For example, the Folsom–Natoma Street and Sacramento–Del Paso Manor monitoring stations are not located near major highways and may not reflect pollutant levels influenced by roadway emissions similar to those affecting the project area. Conversely, while the Roseville–North Sunrise Avenue and Sacramento–Bercut Drive stations are located near roadways, they are situated in terrain that differs from the foothill terrain surrounding the project site. Therefore, air monitoring data used in the DEIR do not represent conditions at the project site.

Appendix W indicates that when available monitoring data may not be fully representative of site conditions, additional analysis or alternative approaches may be appropriate to ensure that background air quality conditions are reasonably characterized. In such cases, nearby emission sources may need to be explicitly included in dispersion modeling rather than relying solely on monitored background concentrations.

Given the proximity of the project site to major roadways and the complex terrain in the surrounding area, the EIR should include a dispersion modeling analysis to include the emissions on the highway and other nearby roadways, with the use of onsite meteorology data mentioned above, so that the existing background can be quantified appropriately.

7) The proposed project is inconsistent with air district guidance and CARB land use recommendations.

The El Dorado County Air Quality Management District's CEQA guidance advises that public agencies should avoid siting a sensitive receptor, such as a school, medical facility, or elder care center near a source of toxic emissions, and vice-versa. Siting the proposed gasoline dispensing facility adjacent to Oak Meadow Elementary School would not be consistent with this guidance.

California Air Resources Board's AIR QUALITY AND LAND USE HANDBOOK recommends avoiding siting new sensitive land uses (such as schools, residences, day cares) within 300 feet of a "large gasoline dispensing facility", defined as one with a throughput of 3.6 million gallons per year or more. This project proposes a throughput of approximately 23 million gallons per year, substantially exceeding the threshold 3.6 million gallons per year. Given the scale of the project, the setback from the school should be significantly greater than 300 feet to minimize

potential exposure to toxic emissions. Approving the project in its proposed location would therefore be inconsistent with both county and state guidance designed to protect sensitive receptors, including children.

8) The estimated daily vehicle idling durations appear to be underestimated.

Table B-1 in Appendix B of the DEIR reports that passenger vehicles visiting the proposed gas station are expected to idle for 6,551 minutes per day on weekdays and 9,115 minutes per day on weekends. The DEIR does not provide the methodology, assumptions, or data supporting these estimates, stating only that the data were provided by Kittelson & Associates.

Based on the proposed annual throughput of 23 million gallons and an assumed average fuel use of 10 gallons per vehicle, approximately 2,300,000 vehicles would visit the gas station annually, or roughly 6,301 vehicles per day. This suggests that the DEIR effectively assumed average idling times of 1.04 minutes per vehicle on weekdays and 1.45 minutes per vehicle on weekends.

However, observed operations at comparable Costco gas stations indicate that actual idling durations are likely substantially longer. For example, assuming an average of 5 minutes of idling per vehicle would result in total daily idling of approximately 31,505 minutes, far exceeding the DEIR estimates.

Without a clear explanation of how these values were derived, it is not possible to determine whether the estimates reasonably reflect actual vehicle idling conditions, including potential peak-period queues. Accurate estimates of idling durations are essential for assessing emissions of criteria pollutants and toxic air contaminants. The DEIR should provide the full methodology, assumptions, and any supporting data used to calculate daily idling durations to ensure that the air quality analysis reflects realistic conditions.

Draft Conclusion: Formal Request for Project Modification

Conclusion and Formal Request

In light of the data presented in the Draft EIR, the El Dorado Hills Area Planning Advisory Committee (EDH APAC) concludes that the project, as currently proposed, prioritizes short-term commercial utility over long-term community safety and sound infrastructure planning.

The DEIR's finding of **"Significant and Unavoidable"** VMT impacts of **32,586 daily miles** is a direct consequence of the project's regional scale and auto-dependent design. We find it unacceptable that the County would approve such an impact while simultaneously proposing **temporary access infrastructure** at Clarksville Crossing that is slated for removal within a few years of the project's opening. This "obsolescence-by-design" approach creates unnecessary circulation conflicts and safety hazards for a corridor that includes four public school sites, and is a shameful waste of infrastructure funding dollars.

Furthermore, the scale of nighttime lighting (up to **37-foot poles**) and the request for a **signage variance** to **1,294 square feet** will result in permanent light pollution and a degradation of the suburban character of El Dorado Hills.

EDH APAC formally requests the following modifications before the Final EIR is certified:

1. **Permanent Access Requirement**: Abandon the temporary signal at Clarksville Crossing and require the construction of a **permanent northern access point** aligned with the future Country Club Drive extension as a condition of project approval.
2. **Enhanced Health Protections**: Given the proximity of Oak Meadow Elementary and the potential for **NOA exposure**, we request independent, third-party air monitoring at the school property line throughout the duration of construction.
3. **Lighting and Signage Reduction**: Deny the variance for building-attached signage and require light pole heights to be reduced to a maximum of 25 feet to mitigate light spillover into adjacent residential backyards.

We believe these modifications are necessary to align the project with the General Plan's goals of protecting residents from incompatible land uses and ensuring efficient delivery of public infrastructure.

Initial Summary:

I. Statement of Concern

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Costco Wholesale project. While recognizing the project's potential contribution to the local tax base, the DEIR reveals critical deficiencies and **"Significant and Unavoidable"** impacts within the Transportation and Circulation element that demand robust mitigation and design reconsideration.

II. Transportation and Circulation: Infrastructure Obsolescence

- **VMT Impact:** The project is projected to result in a net increase of **21,123 daily VMT**. When combined with the North Site Remainder Area, the total reaches **32,586 daily VMT**, exceeding regional thresholds.
- **Temporary Infrastructure:** The DEIR proposes a **temporary connection and traffic signal** at Silva Valley Parkway and Clarksville Crossing. This infrastructure is slated for **removal** upon the future extension of Country Club Drive (CIP No. 36105008).
- **Access Misalignment:** Reliance on a temporary signal creates unnecessary future hazards. APAC advocates for a **permanent northern access point** aligned with the future Country Club Drive extension from the outset to fulfill the objective of minimizing circulation conflicts.
- **Impracticality of Mitigation:** The DEIR admits that because members purchase in bulk, alternative modes of transport like walking or biking are **"impractical,"** reinforcing the need for permanent, high-capacity roadway planning.

III. Public Health and Air Quality

- **School Proximity:** Oak Meadow Elementary is located just **65 feet** from the project site. The unmitigated cancer risk for "Other Sensitive Receptors" (including the school) was modeled at **9.1 in one million**.
- **Naturally Occurring Asbestos (NOA):** The site is adjacent to known NOA areas. Grading and "silent blasting" on the North Site pose an airborne release risk to students and staff.
- **Mitigation:** While the DEIR requires **Tier 4 Final emission standards** and an **Asbestos Dust Mitigation Plan**, EDH APAC requests independent third-party monitoring.

IV. Localized Noise and Vibration

- **Nighttime Impacts:** Nighttime concrete pours on the South Site will increase noise levels by **5.3 to 6.5 dBA** at nearby residences, exceeding the 3 dBA "substantial increase" threshold and risking sleep disruption.

- **Operational Shifts:** Silva Valley Parkway will experience traffic noise increases of up to **1.5 dBA**, categorized as a substantial increase for segments already exceeding 65 dBA.
- **Vibration Hazards:** Future development of the North Site Remainder Area may require **pile driving**, which exceeds annoyance thresholds within **293 feet** of sensitive receptors.

V. Aesthetics and Nighttime Light Spillover

- **Physical Scale:** The project proposes LED fixtures on poles up to **37 feet** high.
- **Light Intensity:** High-intensity zones surrounding the fuel facility are modeled at **5.0+ Foot-Candles (FC)**. Proximity to residences (within 9–10 feet) leaves zero margin for error in preventing spillover.
- **Signage Variance (V22-0001):** The applicant seeks to exceed standard limits with **1,294 square feet** of total signage, which will contribute to significant "sky glow" and light pollution.

VI. Biological Resource Impacts

- **Loss of Shielding:** The project will remove **13 protected oak trees**, including **three Heritage Trees**. These trees currently provide a natural visual and acoustic buffer for the community.
- **Habitat Removal:** Construction involves removing **0.35 acres of valley oak woodland** and filling documented **wetland habitats**.

VII. Formal Request for Project Modification

EDH APAC Believes these modifications are necessary before the Final EIR is certified:

1. **Mandate Permanent Access:** Abandon the temporary Clarksville Crossing signal in favor of a permanent northern access at the future Country Club Drive alignment.
2. **Independent Air Monitoring:** Require continuous and rigorous third-party air monitoring for NOA at the Oak Meadow Elementary property line during all grading and blasting activities.
3. **Restrict Scale of Illumination:** Deny the signage variance and reduce light pole heights to a 25-foot maximum to preserve community character and protect residential backyards.

EDH Costco Project: Key Facts & Figures

1. Transportation and Circulation

- **Total Project Daily VMT**: **32,586 miles** (Costco Project: **21,123**; North Site Remainder Area: **11,463**).
- **VMT Impact Status**: **Significant and Unavoidable**.

- **Infrastructure Obsolescence**: A traffic signal will be installed at **Silva Valley Parkway and Clarksville Crossing**, but it and the physical connection will be **removed** upon the future extension of Country Club Drive.
- **Delivery Frequency**: **10–12 warehouse trucks** per day and **4–5 fuel tankers** per day.
- **Receiving Hours**: Primary warehouse deliveries occur between **2:00 a.m. and 1:00 p.m.**

2. Public Health and Air Quality

- **School Proximity**: Oak Meadow Elementary is **65 feet** from the project boundary.
- **Unmitigated Cancer Risk**: **11 in one million** for residents and **9.1 in one million** for "Other Sensitive Receptors" (schools).
- **Asbestos Risk**: The site is adjacent to mapped **Naturally Occurring Asbestos (NOA)** review areas.
- **Construction Mitigation**: Requires **Tier 4 Final** emission standards for off-road equipment over 50 hp and an **Asbestos Dust Mitigation Plan**.

3. Noise and Vibration Impacts

- **Nighttime Construction Noise**: Concrete pours on the South Site will reach **54.4 to 57.9 dBA L_{eq}** at nearby property lines.
- **Residential Noise Increase**: Nighttime noise levels are expected to increase by **5.3 to 6.5 dBA** at the nearest residences (R-SR 3 and R-SR 4), exceeding the 3.0 dBA threshold for significance.
- **Operational Traffic Noise**: Traffic on Silva Valley Parkway will increase by **1.5 dBA**, a "substantial increase" per County standards for segments already exceeding 65 dBA.
- **Vibration Limit**: Future pile driving on the North Site Remainder Area must not exceed **0.20 in/sec PPV** to avoid structural damage.

4. Aesthetics and Nighttime Lighting

- **Scale of Illumination**: Light poles will reach heights of **37 feet**.
- **Signage Footprint**: **1,294 total square feet** of building-attached signage is proposed (Warehouse: 1,210 sq. ft.; Fuel Canopy: 84 sq. ft.).
- **High-Intensity Zones**: The fueling area and warehouse entry are modeled at **5.0+ Foot-Candles (FC)**.
- **Residential Proximity**: Residential property lines are as close as **9–10 feet** from the project boundary.

5. Biological and Environmental Resources

- **Tree Loss**: **13 protected oak trees** will be removed, including **three Heritage Trees** (36"+ diameter).

- **Habitat Conversion**: **0.35 acres of valley oak woodland** will be removed.
- **Wetland Impact**: **1.021 total acres** of aquatic resources were identified, including **0.206 acres** of wetlands to be filled.
- **Solid Waste**: Operational waste is estimated at **2,368 pounds per day** for Costco and **2,970 pounds per day** for the remainder area.

VMT & Mitigation Questions

1. **VMT Threshold Failure**: The DEIR admits that the project, when combined with the North Site Remainder Area, will generate **32,586 daily VMT** and that mitigation is "impractical" for warehouse shopping. If the impact is truly "unavoidable," what alternate project scales or site configurations were analyzed to actually meet the County's "no net increase" threshold?
2. **Mitigation Effectiveness**: Mitigation Measures 3.14-2a and 3.14-2b only reduce employee commute VMT by approximately **872 miles**. Given that employee trips account for only **18%** of the total daily VMT, why are there no mitigation requirements targeting the **82%** of VMT generated by member shopping and fuel trips?
3. **Regional vs. Local VMT**: The Urban Decay Analysis suggests that the project will "recapture" leakage from residents currently driving out of the county. Has the County's VMT model specifically accounted for the reduction in long-distance trips to the **Folsom Costco** or other regional big-box retailers to provide a "net-net" regional VMT figure?

Infrastructure & Access Questions

4. **Temporary Signal Justification**: Why is the County proposing a "temporary" traffic signal at **Silva Valley Parkway and Clarksville Crossing**? What is the estimated fiscal and environmental cost of installing this infrastructure only to remove it upon the future extension of **Country Club Drive**?
5. **Alignment with Future Planning**: If the project's VMT impact is already significant, wouldn't a **permanent access point** at the future Country Club Drive alignment provide more efficient circulation and a better "Conflict Minimization" outcome from day one?
6. **Safety During Transition**: How will the County manage the "geometric design feature" hazards when the Clarksville Crossing connection is removed? What will the detour and circulation impacts be for fuel tankers and warehouse delivery trucks during that reconstruction phase?

Delivery & School Safety Questions

7. **Truck Routing Enforcement**: The DEIR specifies that trucks will avoid the residential areas and schools to the north. What enforceable mechanisms or signage will be in place to ensure that **15+ daily heavy vehicles** do not utilize Silva Valley Parkway north of the project site?
8. **School Zone Congestion**: During an emergency evacuation scenario, the DEIR shows an increase in travel times. Has the lead engineer reviewed the impact of Costco customer traffic on the safe and orderly arrival/dismissal cycles of **Oak Meadow Elementary School**, which is only **65 feet** from the site?

Summary of Significant and Unavoidable (SU) Impacts

Under CEQA, a finding of "Significant and Unavoidable" means that even with all feasible mitigation measures applied, the impact remains above the established threshold of significance.

1. Transportation: Vehicle Miles Traveled (VMT)

- **Project Impact (3.14-2)**: The Costco project will result in a net increase of **21,123 daily VMT**.
- **Remainder Area Impact**: Future development of the North Site Remainder Area is projected to add **11,462 daily VMT**.
- **Cumulative Impact (4-14)**: The combined effect exceeds the County threshold of "no net increase" in regional VMT.
- **Why it is Significant but Unavoidable**: While mitigation measures like employee commute programs and pedestrian improvements were identified, they only reduce a fraction of the total VMT. The primary source of VMT is member shopping, and the DEIR admits the Costco business model makes walking, biking, or transit trips **"impractical"**.

Potentially Significant Impacts (Reduced to Less Than Significant with Mitigation)

While the VMT impact is the only one labeled "Unavoidable," EDH APAC is concerned that the following areas were **Significant** until specific mitigation was applied. If the County fails to enforce these measures, these impacts would also become significant.

Air Quality & Health

- **Construction Emissions**: Combined emissions from Costco operations and Remainder Area construction would exceed limits for **Reactive Organic Gases (ROG)**.
- **Cancer Risk**: Without mitigation, nearby residents face a cancer risk of **11 in one million**.
- **Asbestos (NOA)**: Because the site is near mapped **Naturally Occurring Asbestos** areas, construction could release hazardous fibers.

Noise & Vibration

- **Nighttime Noise**: Concrete pours on the South Site will reach **57.9 dBA L_{eq}**, causing a substantial increase (up to **6.5 dBA**) over existing nighttime levels at nearby homes.
- **Vibration**: Potential **pile driving** at the Remainder Area could cause human annoyance or structural damage to buildings within **293 feet**.

Biological & Cultural Resources

- **Sensitive Habitats**: Construction will remove **Riparian Habitat**, **Purple Needlegrass Grassland**, and **Wetlands**.
- **Special-Status Species**: Potential loss of the **Coast Horned Lizard**, **Western Spadefoot**, and **Burrowing Owl**.
- **Tribal Resources**: While none were identified during consultation, ground-disturbing work could damage **undiscovered Tribal Cultural Resources**.

Wildfire Hazards

- **Construction Ignition**: Equipment and "hot work" during construction could exacerbate wildfire risks on the undeveloped portions of the site.

EDH APAC Note

When the County issues a **Statement of Overriding Considerations**, they are essentially arguing that the project's economic benefits (tax revenue, jobs) "outweigh" the **32,586 daily VMT** and other environmental costs. EDH APAC is concerned that the **economic benefit** does not justify the **infrastructure failure** of using a temporary signal at Clarksville Crossing while permanently increasing regional traffic.

Citizen’s Summary: The Environmental Cost of the EDH Costco Project

When El Dorado County considers approving the Costco project, they must address a formal **Statement of Overriding Considerations**. This means the County is acknowledging that the project will cause permanent, negative impacts to our community that **cannot be fixed**, but they believe the economic benefits (like tax revenue) are more important than these environmental costs.

The "Significant and Unavoidable" Impact: Traffic

The only impact officially labeled as "Unavoidable" is the massive increase in regional traffic.

- **32,586 New Miles Every Day**: The combined project will add over 32,000 daily Vehicle Miles Traveled (VMT) to our local and regional roads.
- **Impractical to Fix**: The Draft EIR admits that while they can offer bike racks or bus info to employees, it is **"impractical"** to expect Costco members to walk, bike, or take the bus for bulk shopping.
- **Regional Magnet**: Because this Costco will attract shoppers from as far away as **Amador County**, it creates a permanent "magnet" for traffic that our local infrastructure was not originally designed to handle.

Other Major Concerns (The "Mitigated" Impacts)

The County also plans to "mitigate" (lessen) several other serious risks. However, if these protections aren't strictly enforced, our community faces the following:

- **Health Risks at Oak Meadow Elementary**: Without high-end "Tier 4" equipment, the cancer risk for nearby residents and students reaches **11 in one million**.
- **Asbestos Exposure**: Because the site is near **Naturally Occurring Asbestos** zones, grading and "silent blasting" could release hazardous fibers into the air.
- **Loss of 13 Protected Oaks**: The project will cut down 13 large oak trees, including **three "Heritage Trees"** (over 3 feet thick) that currently act as a natural screen for our neighborhoods.
- **Nighttime Noise**: Building the warehouse foundation will require **nighttime concrete pours**, increasing noise at nearby homes by up to **6.5 decibels**—a level that disrupts sleep and exceeds County safety standards.

The "Temporary" Infrastructure Trap

The project currently relies on a **temporary traffic signal** at Clarksville Crossing.

- The County intends to **remove this signal** once Country Club Drive is extended.
- Residents ask: **Why build temporary infrastructure to support a permanent, 32,000-mile daily traffic increase?**

Based on a review of the **Transportation Impact Analysis (TIA)**, which evaluates Level of Service (LOS) and traffic delay as operational matters distinct from the CEQA-mandated VMT analysis, several critical issues and gaps in the study's scope have been identified.

Per the El Dorado County General Plan and Transportation Impact Study Guidelines, the minimum acceptable level for signalized and unsignalized intersections in a Community Region is **LOS E**. Operations at **LOS F** are considered unacceptable.

I. Critical Identified Traffic Impacts (LOS F)

The TIA reveals that the project will cause or exacerbate failures at several key intersections that do not meet the General Plan's minimum standards.

Intersection Location	Analysis Scenario	Peak Hour	Delay (sec)	Resulting LOS
Silva Valley Pkwy & Entrada Lane	Existing + Project	Saturday	55.3	**LOS F**
Silva Valley Pkwy & Entrada Lane	Near-Term + Project	Saturday	>100	**LOS F**
White Rock Rd & Valley View Pkwy	Near-Term No Project	PM	>100	**LOS F**
White Rock Rd & Valley View Pkwy	Near-Term + Project	PM	>100	**LOS F**

Critical Concern: The TIA notes that the addition of project trips to the already failing White Rock Road/Valley View Parkway intersection will "further deteriorate operations". While proposed improvements (adding a northbound right-turn lane and increasing storage) would improve delay from 228.5 to 180.7 seconds, the final result remains **LOS F**. **This constitutes an ongoing violation of the General Plan's LOS E minimum standard.**

II. Significant Gaps and Missing Scope in the TIA

EDH APAC members have observed the TIA's geographic scope is notably constrained.

- **Missing Northern Corridor Analysis:** The TIA defines 19 study intersections, but the northernmost extent of analysis ends at **Silva Valley Parkway and Harvard Way**. It completely ignores impacts on Silva Valley Parkway from **Serrano Parkway north to Green Valley Road**. This ignores a major feeder route for both employees and regional customers coming from the north side of El Dorado Hills and Folsom.
- **Omission of Bass Lake Road Feeders:** While the TIA analyzes the Bass Lake Road/US 50 interchange , it provides **zero analysis** for the segment of Bass Lake Road connecting **Serrano Parkway down to Silva Valley Parkway**. This is a critical missed pattern, as this segment is a secondary artery for local residents and would likely see significant project-related shifts.
- **Limited Peak Hour Analysis:** For the majority of the 19 intersections (Intersections 1-6 and 15-19), the TIA **only** performed a PM peak hour analysis. AM peak and Saturday midday peak hour data were only collected for a small subset of the study area (Intersections 7-14 and site driveways). Given that Costco generates its highest volumes during the Saturday midday peak (1,697 trips vs. 1,277 PM trips), the failure to model Saturday impacts for the entireLat corridor is a major oversight.

III. Questions From EDH APAC to El Dorado County

1. **General Plan Violation:** How can the County justify approving a project that, even with recommended off-site improvements, leaves the **White Rock Road and Valley View Parkway-Vine Street** intersection operating at **LOS F**? This is a direct violation of the mandatory General Plan LOS E standard for Community Regions.
2. **Missing Saturday Data:** Why was the analysis of the Saturday midday peak hour—which is the **highest-volume travel period** for the project (1,697 total trips)—restricted to only a few intersections near the site and not applied to the entire study area?
3. **Corridor Logic:** Why were critical corridor connector segments, specifically **Silva Valley Parkway north to Green Valley Road** and **Bass Lake Road between Serrano Pkwy and Green Valley Road**, excluded from the TIA scope despite being primary routes for regional customers and employees?
4. **Ineffective Mitigation at Entrada:** The TIA suggests "considering" restricting westbound left turns at **Silva Valley Parkway and Entrada Lane** on Saturdays to "mitigate" LOS F. Has the County analyzed the secondary traffic impacts of diverting those restricted vehicles into the surrounding residential neighborhoods? There are existing daypart restrictions for Entrada for Oak Meadow Elementary School impact, in very close proximity to the Silva Valley Pkwy-US50 interchange. At what point will the County address these impacts and provide a legitimate corrective solution to the area infrastructure, instead of daypart “half” measures?
5. **SimTraffic Queue Risks:** The SimTraffic analysis shows that projected project queues on northbound Silva Valley Parkway will extend **almost to the westbound US 50 ramp intersection**. With future development of the North Site Remainder Area, will the

County require a more robust queue analysis to ensure Costco traffic does not physically back up onto the US 50 mainline?

IV. General Plan Consistency and TIA Deficiencies

While the DEIR addresses CEQA-mandated VMT impacts, the EDH APAC finds that the project's Transportation Impact Analysis (TIA) reveals multiple violations of the El Dorado County General Plan's mandatory Level of Service (LOS) standards. Per Policy TC-Xd, the minimum acceptable operational standard for intersections within a Community Region is LOS E. Any operation at LOS F is a direct violation of County policy.

1. Unmitigated General Plan Violations (LOS F)

The TIA confirms that even with recommended off-site improvements, the project will result in unacceptable traffic operations.

- White Rock Road & Valley View Parkway (Intersection 15): This intersection is projected to operate at LOS F in the Near-Term Plus Project PM peak hour. Even with proposed capacity increases (northbound right-turn lane and increased storage), the delay only improves from 228.5 to 180.7 seconds—remaining significantly within the LOS F range.
- Silva Valley Parkway & Entrada Lane (Intersection 8): Under "Existing Plus Project" conditions, the Saturday midday peak hour drops to LOS F with a delay of 55.3 seconds.

2. Geographic Omissions and Scope Gaps

The EDH APAC identifies a significant failure to analyze the project's impact on the broader corridor networks that serve as primary feeder routes for regional customers and employees:

- Northern Silva Valley Parkway Omission: The TIA study area ends abruptly at Silva Valley Parkway and Harvard Way. It fails to analyze impacts north to Green Valley Road, a critical segment for residents of northern El Dorado Hills and Folsom traveling to the site.
- Bass Lake Road Feeder Gaps: While the TIA looks at the US 50 interchange, it provides no analysis for Bass Lake Road between Serrano Parkway and Silva Valley Road, ignoring a primary travel artery for local members.
- Insufficient Saturday Analysis: The TIA acknowledges that Saturday midday is the project's highest volume period (1,697 total trips compared to 1,277 in the PM peak). However, Saturday data was only collected for a small subset of the 19 study intersections, leaving the majority of the regional network unvetted for the project's busiest hours.

3. SimTraffic Queuing and Mainline Risks

The SimTraffic analysis indicates that 95th percentile queues on northbound Silva Valley Parkway will reach 698 feet in the PM peak and 611 feet on Saturdays. The TIA admits these

queues extend "almost to the westbound US-50 ramp intersection". APAC is concerned that any further demand from the North Site Remainder Area will cause traffic to back up onto the US 50 mainline, creating a major safety hazard.

V. Formal Questions for the Final EIR (FEIR)

1. Mandatory LOS Compliance: How can the County find the project consistent with the General Plan when the White Rock Road/Valley View Parkway intersection remains at LOS F even after all proposed mitigation is applied?
2. Diverted Neighborhood Traffic: The TIA suggests "considering" a restriction on Saturday westbound left turns at Silva Valley Parkway and Entrada Lane to improve LOS. Has a "neighborhood cut-through" analysis been performed to determine where these diverted vehicles will go?
3. Feeder Route Impact: Why were the segments of Silva Valley Parkway (North to Green Valley) and Bass Lake Road (Serrano to Silva Valley) excluded from the study, given their role as primary regional access routes?
4. Signal Removal Detours: Upon the removal of the "temporary" signal at Clarksville Crossing, what is the specific detour plan for fuel tankers and heavy warehouse delivery trucks?

ADDITIONAL NOTES

I. Statement of Concern

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) has completed a technical review of the Draft Environmental Impact Report (DEIR) and the associated Transportation Impact Analysis (TIA) for the El Dorado Hills Costco Project. Our review identifies critical failures in long-range infrastructure planning, direct violations of mandatory General Plan Level of Service (LOS) standards, and unmitigated public health risks.

II. Transportation: Significant and Unavoidable Impacts

- VMT Magnitude: The project, including the North Site Remainder Area, will result in a net increase of 32,586 daily Vehicle Miles Traveled (VMT).
- Impracticality of Mitigation: The DEIR admits that the Costco land use and business model is inherently auto-oriented, making walking, biking, or transit trips "impractical" for members.
- Infrastructure Obsolescence: The project relies on a temporary traffic signal at Silva Valley Parkway and Clarksville Crossing that will be removed upon the future extension of Country Club Drive (CIP No. 36105008).
- Access Misalignment: APAC advocates for a permanent northern access point aligned with the future Country Club Drive alignment at the outset to fulfill the objective of "minimizing circulation conflicts".

III. TIA Deficiencies and General Plan Violations (Non-CEQA)

The TIA reveals that the project fails to meet the County's mandatory LOS E standard for Community Regions:

- Unacceptable Operational Failure: White Rock Road & Valley View Parkway (Intersection 15) is projected to operate at LOS F even with proposed mitigation, with delays exceeding 180 seconds.
- Geographic Omissions: The TIA study area ends at Silva Valley Parkway and Harvard Way, ignoring impacts north to Green Valley Road and failing to analyze the Bass Lake Road corridor between Serrano and Silva Valley.
- Insufficient Saturday Data: Despite Saturday being the highest volume period (1,697 trips), Saturday data was only collected for a small subset of the 19 study intersections.
- Mainline Back-up Risk: SimTraffic analysis shows queues extending "almost to the westbound US-50 ramp intersection", risking back-ups onto the freeway mainline.

IV. Public Health and Air Quality

- School Proximity: Oak Meadow Elementary is just 65 feet from the project boundary.
- Cancer Risk: The unmitigated cancer risk for residents is 11 in one million, exceeding the 10-in-one-million threshold.

- Asbestos (NOA) Exposure: The site is adjacent to mapped Naturally Occurring Asbestos review areas; grading and "silent blasting" pose an airborne release risk to students and staff.

V. Localized Noise and Vibration

- Nighttime Sleep Disruption: Nighttime concrete pours on the South Site will increase noise levels by 5.3 to 6.5 dBA at nearby residences, a level known to disrupt sleep.
- Cumulative Construction: Potential pile driving at the North Site Remainder Area exceeds human annoyance thresholds within 293 feet.

VI. Aesthetics and Lighting

- Physical Scale: The project proposes LED fixtures on poles up to 37 feet high.
- Intense Illumination: High-intensity zones surrounding the fuel facility are modeled at 5.0+ Foot-Candles (FC).
- Signage Variance (V22-0001): The applicant seeks a variance for 1,294 square feet of signage, which exceeds CR zone standards and increases light pollution.

VII. Formal Request for Project Modification

Before the Final EIR is certified, EDH APAC requests:

1. Mandate Permanent Access: Replace the temporary Clarksville Crossing signal with a permanent northern access aligned with Country Club Drive.
2. Mandatory LOS Compliance: Redesign the White Rock Road/Valley View Parkway intersection to ensure LOS E or better operations.
3. Independent Air Monitoring: Require third-party NOA air monitoring at the Oak Meadow Elementary property line during construction.
4. Preserve Character: Deny the signage variance and reduce light pole heights to 25 feet to protect residential backyards.

Technical Cross-Reference Index

1. Transportation and Circulation

Concern	Section / Table / Page	Identified Mitigation Measure

VMT (32,586 daily net increase)	DEIR Impact 3.14-2 (p. 3.14-13)	MM 3.14-2a, 3.14-2b, 3.14-2c
Temporary Traffic Signal Removal	DEIR Section 2.3.2 (p. 2-24)	No mitigation identified for infrastructure removal.
LOS F: White Rock & Valley View	TIA Table 2 (p. viii); TIA Section 2 (p. 61)	Intersection redesign / Lane additions
LOS F: Silva Valley & Entrada	TIA Table 1 (p. viii); TIA Section 2 (p. 47)	Restricted Saturday left-turns
Inadequate 15' Access Width	DEIR Section 3.17.3 (p. 3.17-23)	Fire apparatus access roads requirements

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2. Public Health and Air Quality

Concern	Section / Table / Page	Identified Mitigation Measure
Cancer Risk (11 in one million)	DEIR Table 3.2-10 (p. 3.2-35)	MM 3.2-4a (Tier-4 Standards)
Asbestos (NOA) Release	DEIR Impact 3.2-4 (p. 3.2-36)	MM 3.2-4b (Dust Mitigation Plan)
Construction Emissions (ROG)	DEIR Table 3.2-6 (p. 3.2-30)	MM 3.2-2 (VOC limits)

3. Noise and Vibration

Concern	Section / Table / Page	Identified Mitigation Measure
Nighttime Noise (+6.5 dBA)	DEIR Table 3.11-13 (p. 3.11-24)	MM 3.11-1b (Nighttime noise barriers)
Traffic Noise (Substantial Increase)	DEIR Impact 3.11-2 (p. 3.11-28)	No mitigation required per DEIR (lack of receptors)
Vibration (Pile Driving)	DEIR Impact 3.11-4 (p. 3.11-46)	MM 3.11-4 (Vibration Control Plan)

4. Aesthetics, Lighting, and Environment

Concern	Section / Table / Page	Identified Mitigation Measure
37-Foot Light Pole Heights	DEIR Figure 3.1-12 (p. 3.1-31)	Cutoff lenses / Shielded fixtures
Signage Variance (1,294 sq. ft.)	DEIR Section 2.5.1 (p. 2-38)	Variance (V22-0001) required
Heritage Oak Tree Removal	DEIR Section 3.3.3 (p. 3.3-38)	Payment of ORMP in-lieu fees

Wetland Fill (0.206 acres)	DEIR Section 3.3.3 (p. 3.3-36)	MM 3.3-4 (Clean Water Act permits)

WORKING GROUP SUMMARY

As a volunteer advisory committee representing the residents of the El Dorado Hills Community Region, our review prioritizes the safety, infrastructure integrity, and policy consistency of major development projects. Our analysis has identified several critical areas where the current project proposal fails to meet the standards set by the El Dorado County General Plan or fails to adequately mitigate significant environmental effects under CEQA.

Executive Summary of Findings

- **Significant and Unavoidable VMT Impacts:** The DEIR identifies a net increase of **32,586 daily Vehicle Miles Traveled (VMT)**. We challenge the finding that these impacts are "unavoidable" while the project maintains a regional-scale design that the DEIR itself labels as "impractical" for alternative transportation.
- **Violations of Mandatory LOS Standards:** The TIA reveals that even with mitigation, the **White Rock Road & Valley View Parkway** intersection will operate at **LOS F**. This is a direct violation of General Plan Policy **TC-Xd**, which mandates a minimum of **LOS E** in Community Regions.
- **Infrastructure Obsolescence:** The proposal to install a **temporary** signal at Clarksville Crossing only to remove it for the Country Club Drive extension represents a failure in long-range infrastructure planning and creates unnecessary future circulation hazards.
- **Geographic Omissions in Study Scope:** The TIA fails to evaluate the project's impact on major northern and eastern feeder corridors, including **Silva Valley Parkway north to Green Valley Road** and **Bass Lake Road** .

Accompanying this letter is a **Detailed Comment Template** and a **Technical Cross-Reference Index** that maps our concerns directly to specific pages and mitigation measures within the project documents.

We request that these comments be addressed in detail within the Final Environmental Impact Report (FEIR) and that the project be modified to include a **permanent northern access solution** aligned with future County infrastructure.

Public Health and Air Quality data from the DEIR

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1. Proximity to Oak Meadow Elementary School

The school is a critical sensitive receptor, located immediately adjacent to the North Site.

- **Distance**: The school property line is just **65 feet** from the project site.
- **Health Risks**: The Health Risk Assessment (HRA) identifies a cancer risk for "Other Sensitive Receptors" (which includes the school) of **9.1 in one million** under an unmitigated scenario.
- **Pollutant Exposure**: The school is within **0.25 miles** of where hazardous materials will be handled and transported for the fuel facility and warehouse operations.

2. Naturally Occurring Asbestos (NOA)

This is a significant localized concern due to the site's geology.

- **Presence**: The project site is adjacent to areas where NOA has been identified.
- **Impact (3.2-4)**: Construction activities, specifically grading and "silent blasting," could result in the airborne release of NOA.
- **Finding**: This impact is categorized as **Significant** prior to mitigation.
- **Mitigation (MM 3.2-4b)**: An **Asbestos Dust Mitigation Plan** must be approved by the EDCAQMD before construction begins.

3. Toxic Air Contaminants (TACs) and Cancer Risk

The DEIR evaluates long-term health risks from diesel particulate matter (DPM) and gasoline vapors.

- **Residential Risk**: For nearby residents (specifically R-SR 3 and 4), the unmitigated cancer risk is **11 in one million**.
- **Threshold Violation**: This exceeds the EDCAQMD significance threshold of **10 in one million**.
- **Mitigation (MM 3.2-4a)**: Requires all construction equipment over 50 hp to meet **EPA Tier 4 Final** emission standards to reduce DPM.

4. Criteria Pollutants and ROG Exceedance

- **Construction Exceedance (Impact 3.2-2)**: The combined emissions from the operation of the Costco project and the construction of the **North Site Remainder Area** will result in **Reactive Organic Gases (ROG)** levels that exceed EDCAQMD thresholds.
- **Mitigation (MM 3.2-2)**: Future buildings in the Remainder Area must use architectural coatings with a VOC content not exceeding **100 grams per liter**.

Identified Concerns

- **Enforcement of Tier 4 Final**: The DEIR allows for Tier 3 equipment with extra filters if Tier 4 is "not available". EDH APAC is concerned that given the 65-foot proximity to a school, **Tier 4 Final must be a non-negotiable requirement**, not a preference.
- **Third-Party Monitoring**: While the DEIR requires a "Disturbance Coordinator" to receive complaints, it does not mandate real-time air quality monitoring at the school property line.
- **Combined Impact Transparency**: The DEIR acknowledges that construction of the North Site Remainder Area (future commercial uses) adds a significant layer of ROG and health risks. EDH APAC requests that the County treat the North Site as a single, high-risk zone rather than two separate analysis points.

Public Health and Air Quality

Public Health Statement: Sensitive Receptors and NOA Risk

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) identifies the proximity of **Oak Meadow Elementary School** and the potential for **Naturally Occurring Asbestos (NOA)** exposure as the most critical public health concerns within this Draft EIR. The current proposed mitigations lack the rigor necessary to ensure the safety of students, staff, and residents in a "High-Risk" geological zone.

1. Critical Proximity to Oak Meadow Elementary

- **Immediate Adjacency**: The school property line is located a mere **65 feet** from the project boundary.
- **Cancer Risk Exceedance**: The unmitigated cancer risk for residential receptors (R-SR 3 and 4) is modeled at **11 in one million**, which exceeds the EDCAQMD significance threshold of **10 in one million**. The risk for "Other Sensitive Receptors," which includes students and staff at the school, is **9.1 in one million**.
- **Programmatic Analysis Gaps**: The DEIR excludes the North Site Remainder Area from a detailed Health Risk Assessment (HRA), despite its proximity to the school, assuming its impacts will be "similar to or less than" the Costco project. APAC finds this qualitative assumption insufficient for a site 65 feet from a primary school.

2. Airborne Asbestos (NOA) and Blasting Risks

- **Geological Hazard**: The project site is adjacent to areas where NOA has been identified.
- **Release Potential**: Construction activities, including grading and "silent blasting" required on the North Site, pose a **Significant Impact** (Impact 3.2-4) due to the potential for airborne release of asbestos fibers.
- **Mitigation Weakness**: Mitigation Measure 3.2-4a allows the use of **Tier 3 engines** if Tier 4 Final equipment is "not available". Given the 65-foot proximity to a school, EDH APAC demands that **Tier 4 Final be a mandatory, non-negotiable requirement** for all equipment over 50 hp to minimize DPM and associated risks.

Odor Findings and Mitigation (Impact 3.2-5)

The DEIR addresses potential nuisance odors primarily associated with the proposed gasoline dispensing facility on the North Site.

- **System Requirements**: To avoid odor emissions, the facility must feature gasoline dispensing nozzles equipped with **Phase II Enhanced Vapor Recovery (EVR) systems**.
- **Finding (Impact 3.2-5)**: The DEIR concludes that odors from diesel exhaust will be temporary and that the gasoline facility, with EVR systems in place, will not result in nuisance odors affecting a substantial number of people.
- **EDH APAC Concern**: While the DEIR labels this as **Less Than Significant**, the proximity to the school and prevailing wind conditions may still cause periodic odor impacts during peak morning drop-off or evening events.

Technical Cross-Reference Index: Public Health & Air Quality

Concern	DEIR Section / Impact	Page Number	Mitigation Measure
Cancer Risk Exceedance	Impact 3.2-4 / Table 3.2-10	3.2-35	MM 3.2-4a (p. 3.2-37)
NOA Exposure Risk	Impact 3.2-4	3.2-36	MM 3.2-4b (p. 3.2-37)
ROG Exceedance (Combined)	Impact 3.2-2 / Table 3.2-6	3.2-30	MM 3.2-2 (p. 3.2-31)
Gasoline Nuisance Odors	Impact 3.2-5	3.2-38	Rule 238 / Phase II EVR
Oak Meadow Proximity	Section 3.2.2 (Sensitive Receptors)	3.2-20	N/A

Findings from the **Phase I Environmental Site Assessment (ESA)** concerning potential soil contamination DRAFT

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1. Request for Clarification: Tier 4 Final Equipment Availability

EDH APAC requires specific clarification regarding the enforcement of **Mitigation Measure 3.2-4a**, which aims to reduce DPM and cancer risk. As currently written, the measure allows for a lower standard of protection if Tier 4 equipment is deemed "unavailable".

Clarification Inquiries:

- **Definition of "Unavailable"**: What specific economic or logistical criteria will the County use to determine if Tier 4 Final equipment is "not available"? Given that Oak Meadow Elementary is only **65 feet** from the project boundary, will a lack of local rental inventory be considered sufficient justification to downgrade to Tier 3 engines?
- **Verification Process**: What documentation must the applicant provide to prove a "good faith" effort to secure Tier 4 Final equipment before the County allows the use of Tier 3 engines with Level 3 verifiable diesel emission control devices?
- **School Site Sensitivity**: Has the County considered making Tier 4 Final equipment a **mandatory requirement** (with no "unavailability" loophole) for all work performed on the **North Site**, due to the immediate proximity of students and the **9.1 in one million** unmitigated cancer risk identified for that location?

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2. Summary: Hazards and Hazardous Materials (Pit and Trough)

The DEIR identifies potential existing contamination on-site that could be disturbed during construction. This finding is based on the **Phase I ESA** prepared in June 2024.

Existing Soil Contamination Risks (Impact 3.8-1)

- **Identified Structures**: The Phase I ESA identified remnants of a former ranch homestead on the South Site, including **multiple concrete structures**.
- **Specific Concerns**: These remnants include a **concrete pit and a watering trough** where the potential for illegal or accidental **dumping of hazardous materials** may have occurred historically.
- **Findings**: The DEIR categorizes this as a **Significant Impact** because construction and demolition activities could release these unknown contaminants into the environment.

Proposed Mitigation (MM 3.8-1)

To address the potential for contaminated soil, the project is required to:

- **Soil Sampling**: Implement a "halt work" condition if **stained soil or unusual odors** are encountered during the removal of these concrete structures.
- **Remediation**: If samples exceed screening level thresholds, the applicant must coordinate with the County, RWQCB, and DTSC to **remediate the soil** until contaminants are below acceptable levels.

EDH APAC Analysis Point

EDH APAC notes that this mitigation is **reactive** (waiting until stained soil is seen) rather than **proactive**. EDH APAC requests **pre-construction core sampling** specifically around the identified pit and trough to identify the extent of any contamination *before* heavy grading machinery potentially spreads it across the site.

Technical Cross-Reference Index

Topic	DEIR Section / Impact	Page Number	Reference Detail
Tier 4 Standard	Mitigation Measure 3.2-4a	3.2-37	Requirement for construction equipment.
Pit/Trough Hazard	Impact 3.8-1	3.8-11	Identification of structures and dumping risk.
Soil Remediation	Mitigation Measure 3.8-1	3.8-13	Procedures for stained or odorous soil.
Phase I ESA	Appendix G	4 (TOC)	Base technical study for hazards.

Analysis of Nighttime Construction Noise (Impact 3.11-1)

While most construction is exempt during daytime hours (7:00 a.m. to 7:00 p.m. weekdays), the Costco project requires approximately **eight nights** of continuous concrete pouring for the building foundation on the South Site. These activities will occur between **midnight and 7:00 a.m.**.

1. Sleep Disruption and Noise Exceedances

The DEIR establishes that existing nighttime noise levels already exceed the County standard of **45 dBA L_{eq}**. Under General Plan Policy 6.5.1.13, any increase of **3 dBA** or more in these areas is considered a significant impact.

- **R-SR 3 (Village Green Drive)**: Nighttime noise is projected to increase by **5.3 dBA**, reaching a combined level of **56.7 dBA**.
- **R-SR 4 (Village Green/Depeyster Way)**: Nighttime noise is projected to increase by **6.5 dBA**, reaching a combined level of **56.4 dBA**.
- **Significance**: Both residential locations will experience a "substantial increase" that exceeds the threshold, risking adverse health effects such as **sleep disruption**.

2. Potential for Mitigation (MM 3.11-1b)

To reduce these levels to less-than-significant, the applicant is required to implement several measures:

- **Temporary Sound Barriers**: Installation of noise curtains or sound walls between construction sources and receptors, capable of achieving a **10 dBA reduction**.
- **Advanced Notification**: Residents within **500 feet** must be notified at least **30 days in advance** of anticipated nighttime noise exceedances.
- **Quieter Procedures**: Replacing individual operations with quieter techniques (e.g., mixing concrete off-site) where feasible.

Construction Vibration Concerns (Impact 3.11-4)

Vibration is of high concern for the **North Site Remainder Area**, where future development details are currently unknown.

- **Pile Driving Risk**: If pile driving is utilized during future construction, it could exceed structural damage thresholds (0.25 in/sec PPV) within **84 feet** and human annoyance thresholds (80 VdB) within **293 feet**.
- **Requirement**: A **Vibration Control Plan** must be developed and approved prior to the issuance of construction permits for subsequent developments in the North Site Remainder Area.

Technical Cross-Reference Index: Noise & Vibration

Concern	DEIR Section / Impact	Page Number	Reference Detail
Nighttime Noise Increase	Impact 3.11-1 / Table 3.11-13	3.11-24	5.3 to 6.5 dBA increase at residences.
Construction Hours	Section 2.3.2	2-36	8 days of nighttime activity for foundation.
Noise Mitigation	Mitigation Measure 3.11-1b	3.11-27	Required temporary sound barriers.
Vibration Thresholds	Impact 3.11-4	3.11-46	Pile driving risks for North Site.
Vibration Mitigation	Mitigation Measure 3.11-4	3.11-47	Requirement for Vibration Control Plan.

EDH APAC Analysis Point

EDH APAC requires a more rigorous definition of "feasible" in **Mitigation Measure 3.11-1b** regarding quieter procedures. If off-site mixing is possible, it should be a **mandatory requirement** for nighttime pours to reduce the on-site noise profile as much as possible for residents on Village Green Drive.

Aesthetics and Lighting - DRAFT

1. Visual Character and Scale (Impact 3.1-1)

The project converts undeveloped grassland into a regional retail center, which will permanently alter public views from Silva Valley Parkway and nearby residential trails.

- **Fuel Facility Prominence**: The North Site will feature a **13,000-square-foot** steel canopy for the fuel facility.
- **Building Design**: The warehouse on the South Site will utilize neutral earth tones and varied parapet heights to attempt to "break up" the long elevations of the **165,000-square-foot** structure.
- **Topographic Advantage**: The warehouse is sited in the southeast corner of the South Site, where higher street elevations help reduce its "apparent height" from certain viewpoints.

2. Nighttime Lighting and Illumination (Impact 3.1-2)

Because the site is currently vacant and has no light sources, the proposed lighting plan represents a massive shift for the neighborhood.

- **Light Pole Heights**: LED fixtures will be mounted on poles ranging from **25 to 37 feet** in height.
- **Intensity Levels**: High-intensity zones at the fuel facility and warehouse entry are modeled at **5.0+ Foot-Candles (FC)**.
- **Residential Proximity**: Residential property lines (R-SR 3 and 4) are as close as **9 to 10 feet** from the project boundary, heightening the risk of light spillover.
- **Operational Hours**: The fuel facility lights will be active starting at **5:00 a.m.** and remain on until **10:00 p.m.** daily.

3. Signage Variance (V22-0001)

The applicant is requesting a variance to allow significantly more signage than normally permitted under standard zoning regulations.

- **Total Signage Area**: The project proposes **1,294 square feet** of total building-attached signage.
- **Warehouse Signs**: This includes one **175-square-foot** sign on the entry canopy and four larger signs totaling **1,210 square feet** on building elevations.
- **Fuel Canopy**: The fuel facility will have four signs totaling **84 square feet** mounted on the steel canopy.

Technical Cross-Reference Index: Aesthetics & Lighting

Concern	DEIR Section / Figure	Page Number	Reference Detail
37-Foot Pole Heights	Figure 2-7 / Figure 3.1-12	2-15 / 3.1-31	Max height for site lighting.
Signage Variance	Section 2.5.1 / Impact 3.1-1	2-38 / 1084	Request V22-0001 for 1,294 sq. ft.
Illumination Intensity	Figure 3.1-12	3.1-31	Shows 5.0+ FC near fuel station.
Residential Distance	Table 3.11-7 (Noise Receptors)	3.11-11	Documents property lines at 9–10 feet.
Fuel Canopy Size	Section 2.3.1 (Architecture)	2-7	13,000-square-foot steel structure.

EDH APAC Analysis

EDH APAC has concerns regarding the **37-foot light poles** and **1,294 square feet of signage** against the project's stated objective to be **"responsive to the El Dorado Hills area design context"** and **"sensitive to the adjacent community."** Denying the variance would be a clear way to reduce the project's visual impact.

Biological Resources findings DRAFT

1. Removal of Protected Oak Resources (Impact 3.3-6)

The project will involve the removal of a significant number of native oak trees that currently provide a natural screen and ecological value to the corridor.

- **Total Trees Removed**: A total of **13 protected oak trees** are identified for removal.
- **Heritage Trees**: Of those 13, **three are classified as Heritage Trees** (native oaks with a trunk diameter of 36 inches or greater).
- **Woodland Loss**: The project will remove approximately **0.35 acres of valley oak woodland**, representing roughly 24% of the total oak woodland on the project site.
- **Mitigation**: The applicant intends to comply with the El Dorado County Oak Resources Management Plan (ORMP) by paying **in-lieu fees** for the impacts.

2. Impacts on Special-Status Wildlife (Impact 3.3-2)

The DEIR identifies 21 special-status wildlife species with the potential to occur on-site. Key concerns for EDH APAC include:

- **Nesting Birds and Raptors**: Project activities such as tree removal and heavy equipment use could result in the loss of active nests or cause abandonment due to noise.
- **Special-Status Bats**: Large oak trees on-site provide potential roosting habitat for **pallid bats** and **western red bats**. If roosts must be removed, the DEIR requires bats to be excluded using "one-way doors" before the tree is cut down.
- **Western Spadefoot & Northwestern Pond Turtle**: Both species are **proposed for listing under the federal Endangered Species Act (ESA)**. If they are listed before construction begins, the applicant may be required to obtain a federal incidental take permit.

3. Loss of Wetlands and Riparian Habitat (Impacts 3.3-3 & 3.3-4)

- **Wetland Fill**: The project would result in the removal (fill) of **0.206 acres of wetlands**.
- **Riparian Degradation**: Approximately **1.4 acres of valley foothill riparian habitat** are present and will be affected by construction and land development.
- **Mitigation (MM 3.3-4)**: Requires a "no-net-loss" basis for wetlands through restoration or the purchase of mitigation bank credits.

Technical Cross-Reference Index: Biological Resources

Concern	DEIR Section / Impact	Page Number	Reference Detail
Heritage Tree Removal	Section 2.5.1 / Impact 3.3-6	2-38 / 3.3-38	3 Heritage Trees to be removed.
Oak Woodland Loss	Impact 3.3-6	3.3-38	0.35 acres (24% of total) removed.
Special-Status Bats	Impact 3.3-2 / MM 3.3-2i	3.3-33	Roosting risks in large oaks.
ESA Proposed Species	Impact 3.3-2 / MM 3.3-2b, 2c	3.3-25 / 3.3-27	Western spadefoot and pond turtle.
Wetland Fill	Impact 3.3-4	3.3-36	0.206 acres of wetlands to be filled.

EDH APAC Analysis

EDH APAC emphasizes that the **in-lieu fee payment** allowed by the ORMP does not replace the **immediate physical loss** of the mature canopy that shields residents from US 50 and the project site. "Mitigation by checkbook" fails to address the localized loss of community character and the natural sound buffer provided by these Heritage Trees.

EDH COSTCO Chronic noise impacts of daily logistics - NOTES

1. Operational Hours and Early Morning Impacts

The DEIR establishes a "Receiving Time" for the warehouse that occurs during the community's most noise-sensitive hours.

- **Receiving Schedule**: Delivery trucks arrive between **2:00 a.m. and 1:00 p.m.**
- **Frequency**: An average of **10 to 12 trucks** per day, with a peak frequency of **2 to 3 trucks per hour**.
- **Significance of Timing**: Most deliveries are completed before **10:00 a.m.**, meaning high-decibel activities (idling, air brakes, and backup alarms) occur primarily during the nighttime and early morning hours when ambient noise is lowest.

2. Logistics Noise Sources and Backup Alarms

The DEIR accounts for general loading dock noise but lacks a specific, granular analysis of the "high-pitched" backup alarms your committee identified.

- **Modeled Noise Levels**: The DEIR uses a reference level for "Loading Dock Activity" of **59.3 dBA L_{eq}** at 100 feet. This includes vehicle idling, engine revving, the release of air brakes, and the use of forklifts/pallets.
- **Backup Alarms**: While not explicitly broken out as a standalone decibel source in the operational section, the DEIR acknowledges the use of **audible self-adjusting backup alarms** as a mitigation for *construction* noise.
- **Distance to Receptors**: The proposed loading dock is at the southwest corner of the warehouse. The nearest residential receptor (R-SR 1) is **1,065 feet away**. At this distance, the DEIR predicts these noises will attenuate to **39 dBA L_{eq}**.

3. Operational "Noise Paradox" in the DEIR

The DEIR concludes that these logistics noises are **"Less than Significant"** based on the following logic:

- **Ambient Comparison**: The predicted operational noise (e.g., 39 dBA for loading docks or 42 dBA for parking lots) is lower than the *existing* average daytime and nighttime noise levels of **52.0 dBA L_{eq}**.
- **County Standards**: The project is modeled to stay within the County's nighttime limit of **45 dBA L_{eq}** for sensitive land uses.
- **APAC Concern Point**: Average (L_{eq}) noise levels do not capture the "nuisance" factor of **single-event maximums (L_{max})** from backup alarms. A high-pitched, 85-decibel alarm at 2:00 a.m. can wake a resident even if the *average* noise for that hour remains low.

Technical Cross-Reference Index: Logistics Noise

Noise Source	DEIR Operating Hours	Modeled Level at 50ft	DEIR Conclusion
Warehouse Trucks	2:00 a.m. – 1:00 p.m.	65.8 dBA L_{eq}	Less than Significant
Loading Docks	2:00 a.m. – 1:00 p.m.	59.3 dBA L_{eq}*	Less than Significant
Forklifts/Pallets	During receiving hours	Part of loading dock activity	Less than Significant
Backup Alarms	During receiving hours	Not specifically quantified for operations	Less than Significant

**Modeled at 100ft*

EDH APAC Analysis regarding Chronic noise impacts of daily logistics

EDH APAC believes that the DEIR fails to address the **"impulsive and tonal"** nature of backup alarms. Under General Plan Table HS-4 (Note 1), the County specifies that noise levels should be **lowered by 5 dB** for simple tone noises or recurring impulsive noises.

Key Questions for the Planning Department:

1. **Tonal Adjustment**: Did the noise model apply the **mandatory 5 dB reduction** to the threshold for the high-pitched, tonal "beeping" of backup alarms as required by the General Plan?

2. **L_{max} vs. L_{eq}**: Why does the DEIR rely on hourly averages (L_{eq}) to dismiss early morning noise, rather than analyzing the potential for sleep awakening caused by instantaneous L_{max} peaks from air brakes and backup alarms?
3. **Alternative Cues**: Will the County require the use of "white noise" (broadband) backup alarms, which are less intrusive to neighbors while maintaining safety, or the use of visual-only cues (flashing lights) in the loading dock area during the hours of 10:00 p.m. to 7:00 a.m.?

Comment on Noise Impact Methodology: L_{eq} vs. L_{max}

The Draft Environmental Impact Report (DEIR) fails to adequately assess the impact of early morning operations on sleep quality by relying exclusively on **Hourly Equivalent Sound Levels (L_{eq})**. This methodology is fundamentally mismatched with the project's noise profile for the following reasons:

- **Averaging Obscures Acute Disturbance:** L_{eq} is a time-weighted average that "smooths out" high-intensity, short-duration events. While a 1-hour L_{eq} may show a negligible increase in ambient noise, it fails to account for the **L_{max} (Maximum Sound Level)** of instantaneous peaks—such as the pneumatic release of air brakes or the piercing frequency of backup alarms.
- **Thresholds for Sleep Awakening:** Scientific consensus indicates that sleep disturbance is triggered by the **intensity and frequency of single-event peaks**, not the average hourly energy. By failing to analyze L_{max} during sensitive early morning hours (typically 10:00 PM to 7:00 AM), the DEIR ignores the high probability of resident "arousal" and sleep deprivation.
- **Low Ambient Baseline:** In the quiet pre-dawn hours, the "Signal-to-Noise" ratio of a backup alarm is significantly higher. The DEIR's reliance on L_{eq} allows these disruptive events to be mathematically dismissed as "insignificant," even when they represent a 30-40 dB jump over the existing ambient baseline.

Conclusion: The DEIR should be revised to include a **Single Event Level (SEL)** or L_{max} analysis for all operations occurring between 5:00 AM and 7:00 AM to accurately determine the level of significance regarding sleep disturbance.

Working Group integrated the findings on Public Health, Air Quality, Noise, Aesthetics, and Biological Resources

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I. Logistics and Operational Noise Impacts

The EDH APAC finds the analysis of operational noise to be insufficient, particularly regarding the daily logistics required to support a regional retail center.

- **Early Morning Disruptions:** The DEIR establishes a "Receiving Time" for the warehouse between **2:00 a.m. and 1:00 p.m.**. Most of the **10–12 daily truck deliveries** are completed before **10:00 a.m.**, ensuring that high-decibel activities occur during the most noise-sensitive hours for residents.
- **Impulsive and Tonal Noise Gaps:** The DEIR relies on hourly averages (L_{eq}) to dismiss loading dock noise as "Less than Significant". However, it fails to account for the **high-pitched, tonal "beeping" of backup alarms** and the instantaneous maximum noise (L_{max}) from **air brakes and material handling equipment** (forklifts, pallet jacks).
- **Mandatory Threshold Adjustments:** Per El Dorado County General Plan Table **HS-4 (Note 1)**, noise standards must be **lowered by 5 dB** for simple tone or recurring impulsive noises. We find no evidence in **Section 3.11** that this mandatory adjustment was applied to the analysis of backup alarms or warehouse logistics.

II. Public Health and Air Quality (Section 3.2)

- **Adjacency to Oak Meadow Elementary:** The school property line is just **65 feet** from the project boundary. The unmitigated cancer risk for residents reaches **11 in one million**, exceeding the County threshold of **10 in one million**.
- **Naturally Occurring Asbestos (NOA):** Impact **3.2-4** identifies a **Significant Impact** regarding the potential airborne release of NOA during grading and "silent blasting" on the North Site.
- **Loophole in Mitigation: Mitigation Measure 3.2-4a** allows for lower-standard Tier 3 engines if Tier 4 Final equipment is "not available". Given the proximity to students, APAC demands Tier 4 Final be a mandatory requirement with no exceptions.

III. Hazards and Hazardous Materials (Section 3.8)

- **On-Site Contamination:** The **Phase I ESA (Appendix G)** identified concrete structures, including a **pit and trough**, where illegal or accidental dumping of hazardous materials may have occurred.
- **Reactive vs. Proactive Mitigation: Mitigation Measure 3.8-1** only requires sampling if "stained soil or unusual odors" are encountered during removal. APAC requests proactive pre-construction core sampling around these structures to prevent the spread of contaminants during initial grading.

IV. Aesthetics and Light Spillover (Section 3.1)

- **Scale of Illumination:** The project introduces **37-foot-high light poles** into a currently vacant landscape. **Figure 3.1-12** shows high-intensity zones of **5.0+ Foot-Candles** near the fuel facility and warehouse entry.
- **Signage Variance (V22-0001):** The applicant requests a variance for **1,294 square feet** of total signage. This exceeds standard commercial zoning meant to protect suburban character and will contribute to permanent light pollution.

V. Biological Resource Impacts (Section 3.3)

- **Heritage Tree Removal:** The project will remove **13 protected oak trees**, including **three Heritage Trees**. We contest that "in-lieu fees" do not mitigate the physical loss of the natural screen and acoustic buffer these mature trees provide for the community.
- **Wetland Fill:** Construction will result in the fill of **0.206 acres of wetlands** on a site currently containing **1.021 total acres** of aquatic resources.

VI. Formal Request for Clarification and Modification

1. **Acoustical Redesign:** Require "white noise" (broadband) backup alarms and the use of visual cues during the **2:00 a.m. to 7:00 a.m.** receiving window to prevent sleep awakening.
2. **Tier 4 Final Mandate:** Remove the "availability" loophole in **Mitigation Measure 3.2-4a**; Tier 4 Final equipment must be used for all construction on the North Site.
3. **Proactive Soil Testing:** Conduct core sampling around the South Site pit/trough remnants **prior** to the start of grading.
4. **Variance Denial:** Deny the signage variance to reduce nighttime light pollution and maintain consistency with the El Dorado Hills design context.

Master Technical Reference Index: EDH Costco Project

1. Transportation and Circulation

Concern	Section / Table / Figure	Page Number	Mitigation / Findings
Regional VMT Increase	DEIR Impact 3.14-2	3.14-13	**32,586 daily VMT** (Significant & Unavoidable).
Acceptable LOS Standard	DEIR Table 3.13-1	3.13-2	**LOS E** required for Community Regions.
LOS F: White Rock/Valley View	TIA Table 2	viii / 61	**>100s Delay** (Significant deterioration).
Temporary Signal Removal	DEIR Section 2.3.2	2-24	Signal at Clarksville Crossing to be **removed** later.
Mainline Traffic Back-up	TIA Table 16	53	Queues extend almost to US 50 WB Ramps.
Geographic Analysis Gaps	TIA Table 3	10	Northern and Eastern corridors excluded from study.

2. Noise, Vibration, and Logistics

Concern	Section / Table / Figure	Page Number	Mitigation / Findings
Nighttime Receiving Hours	DEIR Section 2.3.2	2-36	**2:00 a.m. to 1:00 p.m.**.
Logistics Noise Levels	DEIR Table 3.11-10	3.11-18	**59.3 dBA L_{eq}** for loading docks (excludes tonal peaks).
Sleep Disruption (+6.5 dBA)	DEIR Table 3.11-13	3.11-24	Nighttime pours exceed increase thresholds.
Vibration Structural Risk	DEIR Impact 3.11-4	3.11-46	**Significant Risk** if pile driving is used.
Mandatory Tonal Penalty	DEIR Table 3.11-4 (Note 1)	3.11-4	Thresholds must be **lowered by 5 dB** for tonal beeps.

3. Public Health and Air Quality

Concern	Section / Table / Figure	Page Number	Mitigation / Findings
School Proximity (65 Feet)	DEIR Table 3.11-7	3.11-11	**Oak Meadow Elementary** (NR-SR 2).
Cancer Risk Exceedance	DEIR Table 3.2-10	3.2-35	**11 in one million** (Exceeds 10/million limit).

Asbestos (NOA) Release	DEIR Impact 3.2-4	3.2-36	**Significant Impact** during grading/blasting.
Tier 4 Standard Loopholes	DEIR MM 3.2-4a	3.2-37	Allows Tier 3 if Tier 4 is "unavailable".

4. Environmental and Land Hazards

Concern	Section / Table / Figure	Page Number	Mitigation / Findings
On-Site Soil Contamination	DEIR Impact 3.8-1	3.8-11	**Pit and Trough** identified as potential dump sites.
Heritage Tree Removal	DEIR Section 2.5.1	2-38	**3 Heritage Trees** and 10 protected oaks to be cut.
Wetland Fill	DEIR Section 3.3.3	3.3-36	**0.206 acres** of wetlands to be removed.
37-Foot Light Poles	DEIR Figure 3.1-12	3.1-31	High-intensity illumination adjacent to homes.
Signage Variance (V22-0001)	DEIR Section 1.1	1-1	**1,294 sq. ft.** total proposed signage.

Project Discrepancy NOTES

I. Overview

The applicant has defined several core objectives for the project, including the goal to provide an **"architecturally appealing"** development and a design that is **"sensitive to the adjacent community"**. However, the technical specifications in the Draft EIR and TIA reveal physical and operational attributes that directly contradict these sensitivity and aesthetic goals.

II. Aesthetic and Design Discrepancies

Project Objective	Technical Reality (Discrepancy)	Reference
"Architecturally Appealing"	**1,294 sq. ft. of Signage**: The applicant is seeking a variance (V22-0001) to install massive building-attached signage that exceeds standard Community Regional (CR) zoning limits.	
"Sensitive to Community"	**37-Foot Light Poles**: The project utilizes 37-foot LED poles that will be visually prominent in a currently vacant landscape and adjacent to homes.	
"Minimize Circulation Conflicts"	**Temporary Infrastructure**: The project relies on a "temporary" signal at Clarksville Crossing that is slated for removal, creating future construction and navigation hazards for the community.	

III. Operational and Environmental Discrepancies

1. Nighttime Sensitivity vs. Logistics Schedule

- **Stated Goal**: To be sensitive to adjacent residential land uses.
- **Technical Reality**: Warehouse receiving is scheduled from **2:00 a.m. to 1:00 p.m.**.

- **Discrepancy**: The quietest hours of the night (2:00 a.m. to 7:00 a.m.) will be subjected to the "tonal beeping" of backup alarms and the release of air brakes from **10–12 heavy trucks** and associated material handling equipment. This schedule prioritizes internal logistics over the **sleep health** of residents located as close as 9–10 feet from the site boundary.

2. "High-Quality" Design vs. Infrastructure Gaps

- **Stated Goal**: To provide a project that satisfies the County's intersection performance requirements.
- **Technical Reality**: The TIA admits the **White Rock Road/Valley View Parkway** intersection will continue to operate at **LOS F** even with recommended improvements.
- **Discrepancy**: A project cannot be described as "high quality" or "consistent with the General Plan" if it fails to resolve a Level of Service violation in a Community Region.

3. Environmental Stewardship vs. Heritage Tree Removal

- **Stated Goal**: To be responsive to the El Dorado Hills area design context.
- **Technical Reality**: The project will remove **13 protected oaks**, including **three Heritage Trees** (36"+ diameter).
- **Discrepancy**: Mature Heritage Trees are a defining feature of the El Dorado Hills design context. Removing them for a fueling facility and parking stalls fundamentally alters the corridor's character in a way that is not "responsive" to the existing natural environment.

IV. Conclusion

EDH APAC asserts that for the project to truly be **"sensitive to the community,"** the County must resolve these discrepancies by:

1. **Denying the signage variance** to protect visual character.
2. **Reducing light pole heights** to a maximum of 25 feet.
3. **Mandating "white noise" backup alarms** and restricting receiving hours to **after 7:00 a.m.** to protect residential sleep patterns.

FIRST DRAFT **Proposed Conditions of Approval**

EDH APAC: Proposed Conditions of Approval (Draft 1.0)

Project: El Dorado Hills Costco (PD15-0001, CUP23-0012, V22-0001)

I. Transportation and Circulation Infrastructure

1. **Permanent Northern Access:** The applicant shall be required to construct a permanent northern access point aligned with the future **Country Club Drive extension** (CIP No. 36105008). The use of a "temporary" traffic signal at **Silva Valley Parkway and Clarksville Crossing** shall be denied to prevent future infrastructure obsolescence and safety hazards during removal.
2. **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**. The current finding of **LOS F** in the TIA is unacceptable under General Plan Policy **TC-Xd**.
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.

II. Operational Noise and Logistics Management

4. **Acoustical "White Noise" Alarms:** All material handling equipment (forklifts, pallet jacks) and delivery vehicles owned or contracted by the applicant shall utilize **broadband (white noise) backup alarms** rather than traditional high-pitched tonal alarms to minimize sleep disruption for residents at **R-SR 3 and 4**.
5. **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.**
6. **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.

III. Public Health and Air Quality Protections

7. **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.
8. **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.

IV. Aesthetics and Lighting Standards

9. **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.
10. **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."

V. Hazards and Soils

11. **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.
