

El Dorado Hills Area Planning Advisory Committee



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June 7, 2023

RE: Carson Creek R & D Project P22-0009 Technical Advisory Committee Meeting, held on April 10, 2023

The El Dorado Hills Area Planning Advisory Committee (EDH APAC) would like to offer the following questions, concerns, and comments on the proposed Carson Creek R & D Project P22-0009 to member agencies and staff resulting from the for April 10, 2023, Technical Advisory Committee (TAC) meeting. Although previously included on TAC distribution lists, EDH APAC Officers did not receive information before the TAC meeting. APAC members must rely entirely on publicly posted documents on the EDC eTRAKiT system. We sincerely appreciate the efforts of staff and member agencies and the continued commitment to transparency and outreach with the El Dorado Hills Community.

We look forward to your responses for review at our EDH APAC regular 21, 2023, meeting at the El Dorado Hills Fire Station 85 Executive Conference Room 6:30 PM.

The Carson Creek R & D Project Application packet project description appears to have two components of interest: (1) the division of four EDHo Business Park parcels into fourteen R&D sites and two open pace/drainage sites, and (2) to obe used for industrial wholesale distribution buildings. EDH APAC zComment/Concern/Question List follows:

1. Among the four possible actions scheduled to be taken by TAC on May 15, 2023, which were approved? Please elaborate on specific directives or conditions that were set forth. Please provide a copy of the meeting minutes and available staff notes for public review.
 - 1.1. EDC eTRAKiT indicates 27 departmental reviews were done on May 1, but none are complete. Have any reviews been forthcoming?

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2. EDH APAC members have concerns regarding ministerial approval of the proposed project based on its immense scale and potential for significant impacts in the El Dorado Hills Community. EDH APAC members are concerned about any effort to designate the process as ministerial approval. EDH APAC believes that public review and input are required with the transparency afforded by public hearings where EDC departmental officials can disclose recommendations and the applicant can present its proposal in the light of day. County's code provides that the Planning Commission hears TPMs for commercial and industrial parcels. Please confirm that the Planning Commission will hear this proposal.
3. EDH APAC members have concerns about the utilization of Research and Development zoning designation as the basis of the proposed use within the EDH Business Park for "industrial wholesale distribution buildings."
 - 3.1. The designation "industrial" by the applicant facially suggests that light or heavy industrial zoning is applicable. How do industrial uses align with R&D defined by EDC codes, zoning matrix, General Plan, and EDH Business Park Specific Plan?
 - 3.2. The proposed use solely for "wholesale warehouse distribution" functions appears to be facially inconsistent with EDC R&D zoning for the EDH Business Park. EDH APAC is not concerned with permitting the distribution of goods as a part of business functions. The question arises when dedicated wholesale warehouse distribution is a recognized function as R & D.
 - 3.3. How does the applicant plan to conform to the requirement for a campus-like environment, and what measures will be applied to mitigate against pollution from goods transfers and storage?
4. EDH APAC members have concern about that the application is predicated on the completion of Carson Crossing Road (also referenced by the apolicant as Carson Creek Road). The specifications on the roadway appears vague relating to matter include curbs, sidewalks, bike lanes, parcel ingress/egress points, street lighting, landscaping, and maintenacne.No reference is made on consrtuction costs and how these road improvements will be financed. What are the related fuding and roadway plans?
5. The Transportation Impact Study Initial Declaration confirms that the EDC DOT requires both a Transportation Impact Study (TIS) AND On-Site Transportation Review (OSTR). What is the status of the TIS and OSTR?
6. TIS form completed by the applicant references the square footage to range from 840,000 to 1,100,000 sq/ft. Are these estimates for the structural footprints? What is the basis for these estimates and the variances? What are the proposed heights of the building(s)? What is the total estimated square footage?
7. What are the building plans? The Project Application Packet does not describe the proposed buildings' number, size, and configuration. EDH APAC is concerned this information is essential in evaluating the impact of the uses as defined to be "industrial wholesale distribution." Given the proposed potential 1.1 million square footage facility(ies), the effect could be transformative to the EDH Business Park and surrounding residential communities.
 - 7.1 What is the physical proximity of the proposed buildings to each other?

- 7.2 What are the building offsets, including landscaping, distance from curbs, relationship to roads, egress and ingress points, sound barriers, parking spots, and signage?
- 7.3 Given the distribution usage, how many load docks or other functional ramps are anticipated for each building? What types of vehicles will be accommodated by the loading docks and ramps?
8. The applicant submitted Trip Generation Estimates consisting of three raw statistics and graphics pages. These exhibits appear to be extracted from a more extensive traffic study that was not made available. The three pages do not include a narrative to explain the basis, methodology, and conclusions. On its face, the estimates lack sufficient substance. The submission elicits additional questions:
- 8.1. The first-page graphic appears to indicate 3707 additional trips. Is that correct? The graphics on the other two pages illustrate different numbers without explanation. What is the anticipated number of additional trips for peak and off-peak times? For the proposed distribution businesses, how are peak and off-peak times different or identical to other EDC traffic studies?
 - 8.2. What is the vehicle mix? If other than passenger vehicles, what are the numbers and types of vehicles used to transport goods to/from the distribution businesses?
 - 8.3. How many employees are anticipated to be employed at the businesses, and what means of transportation will they utilize?
 - 8.4. What is the estimated impact by vehicle type on Latrobe, Carson Crossing, Golden Foothills, White Rocks, and nearby roadways?
 - 8.5. What are the personal and truck parking requirements and configurations? Will temporary or permeate trailers be required to load and off-load goods?
 - 8.6. What percentage of the distribution and fulfillment services vehicle traffic generation will be new to El Dorado Hills? That is - trips above existing fulfillment travel that come into El Dorado Hills, compared to the amount of traffic generation for fulfillment trips to other parts of El Dorado County, Amador County, Folsom, Rancho Cordova, and eastern Sacramento County that will be generated **from** El Dorado Hills?
9. The Large Maps_P22-0009.pdf raises concerns, comments, and questions:
- 9.1. Page 1, Carson Creek Road is identified as connecting at the south end to Carson Crossing Road. Is this a typographical error or a new name for this segment?
 - 9.2. Page 1, Carson Creek Road exits to the north on Latrobe Road and to the south at Golden Foothills, connecting to Carson Crossing Road.
 1. What are the planned signals and signage?
 2. Are the designated vehicle widths and turn lanes applicable for vehicle types used for distribution functions?
 3. What is the traffic impact at the points of egress and ingress?
 4. Are turnoff lanes onto Latrobe and Golden Foothills needed?

5. What is the number of trips by passenger and truck anticipated for Carson Creek Road and nearby roadways?
 6. What impact is anticipated on pedestrian access across Carson Crossing at current stop signs and vehicle ingress/egress to/from the Heritage and Four Seasons residential communities?
- 9.3. Page 2 shows secondary roads or alleys connecting most of the proposed lots. Several questions arise:
1. What types of vehicles will be accommodated?
 2. What construction materials are planned (include specifications such as weight loads)?
 3. The northern point at Lots 12 and 13 shows in exchange at Latrobe Road. What are the specific details? How will this impact traffic flow on Latrobe Road?
 4. Is the width of these secondary conveyances sufficient to accommodate the type of large vehicles anticipated to support the distribution functions?
 5. Where are the ingress and egress points on each parcel?
 6. Are the secondary conveyances support emergency vehicle access?
 7. Lot 3 does not appear to have an access point. What is the proposal for this lot?
- 9.4. Page 3 shows a shift of Carson Crossing Road to the west and north by approximately 150 feet onto Latrobe Road. Carson Crossing Road would be extended to the existing segment of Carson Crossing Road that loops around the Heritage and Four Seasons senior citizens' community and ends at White Rocks Road. The proposal will effectively create a traffic loop. EDH APAC members are concerned that these residential communities' impacts have not been addressed. The increase and nature of the traffic are not forthcoming. Carson Crossing Road width consistency, and sound and pollution mitigation remain open issues.
10. Impacts on LOS at:
- 10.1. US50 at EDH Blvd/LatrobeRd interchange
 - 10.2. Latrobe Rd - Town Center Blvd intersection
 - 10.3. Latrobe Rd - White Rock Rd intersection
 - 10.4. Latrobe Rd - Monte Verde Dr/Golden Foothill Pkwy (north) intersection
 - 10.5. Latrobe Rd - Suncast Lane intersection
 - 10.6. Latrobe Rd - Clubview Dr/Golden Foothill Parkway (south) intersection
 - 10.7. Latrobe Rd - Larkstone Place intersection
 - 10.8. Latrobe Rd - Investment Blvd intersection
 - 10.9. Latrobe Rd - Royal Oaks Dr intersection
 - 10.10. Latrobe Rd - Wetsel-Oviatt Rd intersection
 - 10.11. US50 at Silva Valley Pkwy/White Rock Rd interchange
 - 10.12. White Rock Rd - Clarksville Crossing intersection
 - 10.13. White Rock Rd - Vine Street/Valley View Pkwy intersection

- 10.14. White Rock Rd - Keagles Ln intersection
 - 10.15. White Rock Rd - Monte Verde intersection
 - 10.16. White Rock Rd - Post Street intersection
 - 10.17. White Rock Rd - Manchester Dr intersection
 - 10.18. White Rock Rd - Bailey Circle intersection
 - 10.19. White Rock Rd - Stone Briar Dr/4-Season Dr intersection
 - 10.20. White Rock Rd - Florentino Dr intersection
 - 10.21. White Rock Rd - Tera Alta Dr/Carson Crossing Rd intersection
11. Is Vehicle Miles Traveled (VMT) a required consideration/metric in the Traffic Impact Analysis as a new project? If not required, can a VMT analysis be completed that would inform the community and decision-makers on the project's impact in regard to the County's VMT formula?
- 11.1. VMT became a standard/metric in CEQA analysis in July 2020, and other area projects proposed and approved in El Dorado Hills before the CEQA VMT implementation have provided VMT analysis.
12. EDH APAC members our initial look at the project scope are concerned about the potential environmental impacts to the Carson Creek Preserve. Entitlements stem from which environmental review/approvals?
- 12.1. The original El Dorado Hills Business Park circa the 1980s? The 2004 Voter Approved El Dorado County General Plan?
 - 12.2. Have significant environmental changes since the environmental review(s) were completed in 1980, 2004, or 2015?
 - 12.3. Do Environmental findings from the recent HELIX Environment Survey for the Carson Creek Preserve have any impacts or significant changes on the Environmental Analysis of the El Dorado Hills Business Park or the project site and its entitlements (since de-annexed from the El Dorado Hills Business Park)?
13. EDH APAC members have concerns about the initial noise study. A more rigorous analysis should ensure that the project adheres to County noise ordinances and avoids impacts not only to residential communities adjacent to the project but also to the business uses in the EDH Business Park, including schools, churches, and other uses: .
14. EDH APAC members have concerns about impacts on utility infrastructure.
- 14.1. Does the project envision an underground electrical service? Will this necessitate additional road construction work to the project to deliver the other electrical service?
 - 14.2. Does the project envision photovoltaic solar infrastructure at the project site?
 - 14.3. Will vehicle usage at the project site utilize EV/Hybrid vehicles or material handling equipment?
 - 14.4. Does PG&E have adequate electrical transmission infrastructure in the area?
 - 14.5. Does the project envision natural gas utilities being provided for the task? Will this necessitate additional road construction work for the project?
 - 14.6. Does the project envision building additional fiber/data connectivity to the site? Will this necessitate extra road construction work for the project?

15. EDH APAC members have concerns about the impact on public services. For example, the requirements outlined in the February 13, 2023, letter from El Dorado Irrigation District remain open. Additionally, comments from the El Dorado Hills Fire District have not been posted.
16. EDH APAC members believe the proposed additional travel lanes on north and southbound Latrobe Road should be completed before the project's full opening/daily activities.
17. EDH APAC members have concerns about compliance with the General Plan's Traffic Element in relation to LOS levels in the El Dorado Hills Community region at several critical intersections along Latrobe Road, White Rock Road, Carson Crossing, and most significantly at the US50 El Dorado Hills Blvd/Latrobe Interchange. In short, the proposed additional north and south travel lanes on Latrobe Road adjacent to the project are necessary, but EDH APAC has concerns that the other travel lanes will not have any meaningful effect on Latrobe Road north of Golden Foothill Pkwy, or more critically the US50 El Dorado Hills Blvd/Latrobe Road interchange
18. EDH APAC members are concerned about the potential traffic impacts on White Rock Road from the Sacramento County Line to Latrobe Road. Has any analysis been provided regarding the effect of the planned US50 Empire Ranch Road interchange in Folsom, which will terminate at White Rock Road in Sacramento County, just adjacent to Carson Crossing in El Dorado County?
19. EDC Air Quality Control District provided a waiver on January 13, 2023, to the applicant for an Air Impact Analysis. EDH APAC is concerned that an increase in commercial vehicles would increase air pollution. Impact on health is a primary concern for the sensitive senior populations of Heritage, Four Seasons, and Oakmount of El Dorado Hills. Increased traffic onto Carson Crossing Road and Golden Foothills Parkway would have similar detrimental impacts on local businesses and other residential communities. The Air Quality Impact Analysis waiver was granted without reference to these issues. How does the EDC Air Quality District plan to measure, monitor, and mitigate the increase in commercial vehicle traffic? Has the project proposed any contribution to the El Dorado County Intelligent Traffic System?
20. EDH APAC has significant concerns about the potential public safety impacts of the proposed project on fire/medical emergency response services in El Dorado Hills. We defer to the El Dorado Hills Fire Department to provide their expert analysis of the impact on their agency and the balance of fire/medical emergency response services in El Dorado Hills.
21. EDH APAC members are concerned that all parties of interest and stakeholders fully participate in the approval/review process. Entities providing services should provide input, including schools, fire departments, emergency services/healthcare, utilities, and parks. Additionally, the size and location of the project suggest the information from recognized organizations and citizens' groups, including Blackstone HOA, Heritage HOA, Four Seasons HOA, EDH APAC, EDH South Communities, Four Seasons Civic League, Concerned Residents of EDH Heritage Village, Lennar Homes of California,

and EDH Chamber of Commerce. Given the proximity to the Carson Creek Preserve, the approval process should include inputs from the U.S. Corp of Engineers, the California Department of Fish and Wildlife, the preserve manager Golden State Land Conservancy, and the preserve owner Heritage HOA. EDH APAC members offer to facilitate working with these diverse but critically important regional stakeholders.

22. APAC members request additional information in sections of the Environmental Questionnaire: #8, #16, #20, and #27. The responses require further clarification.

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

Respectfully,

Robert Williams

EDH APAC Secretary

El Dorado Hills Area Planning Advisory Committee

Cc George Turnboo, District 2 Supervisor

"Non-Partisan Volunteers Planning Our Future Since 1981"