



PC 12-9-21
 Krystina Baudrey <krystina.baudrey@edcgov.us>

#3 5 pages

Fwd: Comment on Proposed Grocery Outlet at Green Valley Station, PD-R20-0009

Debra Ercolini <debra.ercolini@edcgov.us>
 To: Krystina Baudrey <krystina.baudrey@edcgov.us>
 Cc: Bianca Dinkler <bianca.dinkler@edcgov.us>

Wed, Dec 8, 2021 at 12:00 PM

Krystina,

Please post this public comment for Bianca's project.

Thank you, Debbie

----- Forwarded message -----

From: **Ernest Bakerman** <bakermanernest@gmail.com>
 Date: Wed, Dec 8, 2021 at 10:17 AM
 Subject: Re: Comment on Proposed Grocery Outlet at Green Valley Station, PD-R20-0009
 To: Bianca Dinkler <bianca.dinkler@edcgov.us>
 Cc: <julie.saylor@edcgov.us>, <debra.ercolini@edcgov.us>

Hello Ms. Dinkler,

Attached please find comments on behalf of Residents for a Safe Cameron Park for the County Planning Commission regarding the proposed Grocery Outlet in Cameron Park, PD-R20-0009. Please confirm receipt of this email and that the attached comments will be sent to the County Planning Commission for their review at their upcoming meeting tomorrow morning.

Sincerely,

Ernest Bakerman
 Residents for a Safe Cameron Park

On Mon, Oct 4, 2021 at 10:31 AM Bianca Dinkler <bianca.dinkler@edcgov.us> wrote:
 Good morning Mr. Bakerman,

I just wanted to reach out to let you know the public hearing for the proposed Grocery Outlet in Cameron Park is scheduled for 10/28/21. All project documents and Agenda with details for the public hearing will be uploaded online 2-weeks prior to the hearing. Please see the Planning Commission website at: https://www.edcgov.us/Government/planning/Pages/planning_commission.aspx (see 'Planning Commission Agenda and Minutes', and select the link to El Dorado County Legistar Calendar).

If you have any further questions or concerns, please let me know.

Sincerely,
 Bianca

[Quoted text hidden]

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 Debra Ercolini
 Development Aide II

21-1660 Public Comment
 PC Rcvd 12-08-21

County of El Dorado
Planning and Building Department
Planning Division
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Placerville, CA 95667
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Comment on Proposed Grocery Outlet at Green Valley Station PD-R20-0009 - Copy (2).pdf

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December 8, 2021

El Dorado County Planning Commission
c/o Ms. Bianca Dinkler
Placerville Office
2850 Fairlane Court
Placerville, CA 95667

RE: Comment on Proposed Grocery Outlet at Green Valley Station, PD-R20-0009

To The Honorable Planning Commission:

This letter was submitted to the Planning Department on behalf of Residents for a Safe Cameron Park to provide comment on the proposed adoption of the mitigated negative declaration (MND) for the proposed “Grocery Outlet at Green Valley Station.” We are resubmitting these comments now to the Planning Commission in hopes that you will hear and act on our concerns for this project.

Availability of Project Materials

As an initial matter, it is important to preserve for the record the fact that the project materials were not made generally available to the public for the comment and review period. The initial study and environmental checklist form, which forms the substance of a mitigated negative declaration, was not posted on the County’s E Trakit system, and the County did not provide the full body of documentation upon request, i.e., the appendices and exhibits containing the studies referred to in the Initial Study were not distributed upon request.

The public was therefore not able to properly engage in review of the project. The County needs to make these materials generally available, per the County Code and state law, to adequately allow for public participation and public review. The public must have access to the same materials that the local agency will rely on in making a final decision as to whether or not to adopt, reject, or modify an environmental determination under CEQA. The County’s failure to publish all the relevant documentation related to the Initial Study/Environmental Checklist and the Mitigated Negative Declaration represents a failure of adequate notice. These materials need to be made available for the full review period to perfect the requirements under CEQA.

Discharge of Particulates (Hydrology and Biological Resources)

To the extent available, both the hydrology and biological resources analyses lack specific review of the impact of discharge of parking lot particulates into soils and groundwater,

and the potential impact not only on water and soils but also consequent impacts on local flora and fauna.

Given the particular grocery retail use, which entails line haul and other delivery trucks idling, a significant volume of passenger vehicles, and, in El Dorado County in particular, salting and other snow remediation measures, the potential impacts of vehicle-parking related particulates may be significant.

El Dorado County is one of the snowiest regions in California, with regularly over 60 inches of snowfall. It is also near to the national average in rainfall at nearly 30 inches. Impermeable surface being dedicated to vehicle-focused use, as with the proposed Grocery Outlet at Green Valley station, implicates specific potentially significant discharges that can be studied. These discharges include road salt, grease and oil, and vehicle fluids, particularly those that form and drip during vehicle idling.

The Initial Study attempts to account for these potential impacts by relying on the standards required by the National Pollutant Discharge Elimination System (NPDES). The NPDES accounts for storm water discharge into general and local water supplies; however, it does not itself account for the immediate impact of particulate runoff into the immediate vicinity of the site, and the potential impact on localized flora and fauna. A fair argument exists that there will likely be a significant impact as a result of the discharge of these particulates into the immediate biome and study should be conducted as to what the precise likely chemical composition will be of these vehicle-associated particulates, and their potential impacts.

Traffic and Transportation

The attachments/appendices for the Initial Study/Environmental Checklist and the Mitigated Negative Declaration were not made generally available to the public for the twenty-day review period, and were not disclosed upon request. As stated above, this constitutes a failure of notice.

What information was made available suggests that the traffic study failed to study the circulation, queuing, VMT, and vehicle trip impacts of Grocery Outlet's more recent on-line order and curbside pick-up services. These services constitute an additional or unique use not accounted for in traditional grocery/retail analyses, for example from the Institute of Transportation Engineers (ITE) Trip General Manual. On-line ordering and curbside pickups can create unique traffic patterns and queuing, and generate differential vehicle trip characteristics. A 2018 study by the Federal Highway Administration (FHWA) indicated that the rise of e-commerce, just-in time inventory, and curbside pickup options would have traffic implications, particularly related to land use. Given that the proposed use is a known quantity, i.e., that existing Grocery Outlet stores

with these options exist, the County should solicit figures from existing stores using these services and determine the potential internal circulation and traffic impacts of these uses.

Public Services/Impact Fees

In general, the reliance on payment on established impact fees may be sufficient to mitigate potential impacts, but those impacts need to be understood so the local agency and the public can make a determination as to whether the category of impact is covered by the impact fees. Insofar as, for example, the proposed location may result in an increase in property crime, property damage, and traffic incidents (notably, this is potentially more likely given the internal circulation issues raised by institution of curbside pickup procedures on the site) demanding police response, whether these would be covered by the “established impact fees,” not described in the Initial Study/Environmental Checklist needs to be delineated with specificity. This is missing from the Initial Study, constituting a deficiency.

Vehicle-focused retail uses, with significant parking facilities and curbside pickup options tend to attract minor to major traffic incidences, as well as petty theft and property crime. These create demands on local police response as well as emergency services responses. Again, since the project operator is known and comparative data is available from existing and comparable sites, the County should solicit this information to make it known to the public for adequate review.

Conclusion

For the foregoing reasons, we urge the County to extend the review period to solicit further data and conduct further review, to make all documentation publicly available for the full statutory period, and allow the public adequate information and opportunity to fully review and comment on the proposed project. Alternatively, we would urge the County not to adopt the Mitigated Negative Declaration. This project should require a full and comprehensive Environmental Impact Report given the impact that it will have on traffic, air/water quality, public safety and residents’ overall quality of life in the neighborhood.

Sincerely,

Ernest Bakerman

Residents for a Safe Cameron Park
Cameron Park, CA