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Bill Bennett, Chairman
Pilot View Drive Zone of Benefit
Advisory Committee
4180 Misty Creek Court
Pilot Hill, CA 95664
(530) 823-7079

January 3, 2010

El Dorado County Board of Supervisors
330 Fair Lane
Placerville, CA 95667

RE: Sundance Subdivision: Z07-0040 /TM07-1454/S09-0012

Supervisors:

Thank you for the opportunity to submit comments and background information to you on behalf of the Pilot View Drive Advisory Committee and the residents we represent. Of the 72 parcels that are within the Zone of Benefit, there are about 50 developed parcels. With about 1/3 of our immediate neighbors yet to come, traffic and groundwater are big worries for us and they are a big concern with this development.

This development project has been in the county planning system for several years. It first came as 29-lot subdivision with water supplied with on-site groundwater wells. After concerns were expressed by neighbors about its use of groundwater, the developer proposed and submitted a 40-lot subdivision using water from the Georgetown Divide PUD. Residents of the Pilot Hill Estates area, north of Sundance, who had experienced dry wells were asked to share in the cost of bring water in. However, when the price tag became \$60,000 per parcel, those residents chose not to participate. The developer then chose to modify and resubmit the plan as 28 lots on groundwater. He provided a *Hydrogeologic Investigation Assessment Report* with that submittal to try and support the premise that the groundwater water supply was adequate. This will be discussed later.

The County Agricultural Commission has unanimously recommended denial of the project on each of the two separate submittals.

The Pilot View Drive zone residents along are primarily concerned with the possibility of through traffic and impacts to their groundwater wells from the proposed development.

Through Motorized Traffic to Pilot View Drive:

The current recommendation from the Planning Commission supports the placement of a fire or emergency gate between the development's Road A and Pilot View Drive. **The residents on Pilot View Drive strongly support the gate or any design that will prevent through traffic to or from the development and Pilot View Drive.**

Allowing through motorized traffic to Pilot View Drive would be a danger and a severe impact of the current residents. The 2006 traffic study did not study the through traffic generated from surrounding areas, only the to-and-from traffic generated by the development. For any one going to or from Folsom, the through traffic route using Road A and Pilot View Drive would save 1 mile or more of commute and the congestion going through Pilot Hill on Salmon Falls. Traffic would originate in Pilot Hill Estates, Peninsula Park, and along Rattlesnake Bar, as well as weekend recreation drivers passing through the area (i.e. motorcycles now currently on Salmon Falls). Without a gate separating Road A from Pilot View Drive, the PV Dr. Residents will be directly impacted and their safety impaired.

Residents currently use Pilot View Dr. for walking, horseback riding and bicycle riding. There are no adjacent trails or shoulders along the roadway. Allowing through vehicle traffic will endanger that walking/riding activity.

The traffic study did not look at the four sharp corners and other areas of reduced sight distance on Pilot View Drive, nor the blind driveways that feed directly to the roadway. The increased traffic will present significant hazards to existing residents as currently planned. Widening the road to 20 feet will not mitigate the dangerous parts of Pilot View Drive, such as the better-than-90-degree switchbacks and blind corners since much of that roadway is already 20-feet-wide.

Less than half of Pilot View Drive is 20 feet wide already and lacks shoulders. It is primarily an 18-foot-wide roadway with some 17.5 foot wide areas with substandard roadway section. The current roadway section is 1-1/2 inches gravel with chip and seal cover. This is well below the standards (Standard Plan 101C). If the gate is not placed to prevent through traffic, the developer would be asked to upgrade the existing Pilot View Drive roadway. It is unclear if this upgrade will add thickness to the section, but without that, the roadway cannot meet weight load goals and the maintenance, provided solely by the residents of Pilot View Drive through a zone of benefit, will be severely impacted (potential increased maintenance).

Groundwater Impacts:

In the previous hearings and submittals to Planning and the Planning Commission, we pointed out a number of deficiencies with the water studies done for the development (*Hydrogeologic Investigation Assessment Report: Water Supply Study*).

- The applicant's water supply study failed to include parcels beyond the boundaries of the subdivision. Surrounding lands generally have or will have smaller parcels (5 acre) and their use of the common groundwater must be included.
- The water supply study does not look at drought years. A repeat of the 1976-1977 years would reduce the annual precipitation to about 15 inches, and thus reduce the supply to the groundwater supplying the area by more than half. Based on the water supply study, the factor of safety reduces to 0.5. This means that there would be only half the water available to supply the development and surrounding area in critical water years.
- The applicant's water supply study does not quantify the groundwater storage in the area. It has not shown that there is adequate storage to "carry over" enough water for one, two, or more dry years for current or proposed new residents. Groundwater in a fractured rock medium is dependent of the water stored in fissures and cracks. Because the development is located on a hill, there is even less water storage available than in flat terrain. **One cannot assess whether there is enough groundwater unless one determines if there is enough storage to carry the users through dry year cycles.** The water supply report fails to do that.
- The applicant's groundwater study failed to obtain any records for existing residents that are located around the proposed development or groundwater information on existing surrounding wells.
 - Failure of at least 7 wells in the area over the past few years.
 - Requirement that several of the properties immediately adjacent to the development to have additional storage tanks because well yields are so low.
- Another technical problem with the applicant's water supply study is that the analysis uses storm or excess rainfall probabilities to assess rain fall pattern. This is not normally done for a water supply study since existing historical records are available. The Pilot Hill Rainfall Station data (CDEC: Station PIH) for the past 15 years is available at an hourly time step and should be used for the analysis, not a theoretical storm frequency. The probability approach used in the analysis ignores drought and critical rainfall years.
- Assuming water from the Georgetown Divide Public Utilities District (GDPUD) can be brought in later if there is a shortage is not a realistic option. Since wells will go dry individually, each homeowner will end up re-drilling a deeper well on their own. The community and GDPUD could not act effectively to organize a collective response to an event that affects residents one at a time.

To help verify and quantify the development's impacts on groundwater, we have performed the enclosed engineering study, *Analysis of Groundwater Availability and Recharge in the Sundance Project Area, Pilot Hill, CA*. This analysis updates the previous work (*Hydrogeologic Investigation Assessment Report*) by using actual rainfall and soils information particular to the Sundance area and including surrounding properties within the analysis.

This analysis concludes the annual recharge of the fractured rock foundation varies significantly year to year. Using a long term average recharge value may overlook significant periods of low annual recharge that exist and can lead to a critical over-estimation of available groundwater supplies, especially for areas where groundwater storage cannot be quantified. For some 4-year periods of historical conditions the analysis shows that there is not enough recharge from rain falling on the area to support the annual water needs of Sundance and the surrounding properties at build out.

This analysis suggests that there is not enough water available for the development and existing residents in critical water years.

Besides increasing the lot size, another alternative to mitigate the development's groundwater impact is to see if at least some of the proposed lots at the lower elevations of the development could receive GDPUD water now. One reason given for not using GDPUD water was that current distribution lines do not have the pressure to reach all the parcels and additional lines at higher pressures would need to be brought in to service the whole development. Not all the parcels need be on city water but the more that are, reduce the impact to the neighborhood.

The depth to water in neighboring wells should be monitored during the required pump test for each new well in the development and if the well shows interference with existing neighboring wells, it should be moved. Monitoring well(s) should also be installed in an appropriate location within the development that can readily monitor the relative depth to water on at least a bi-annual basis. This monitoring would warn residents of lowering groundwater levels and allow them mitigate that impact before existing wells go dry without warning.

Connector Trail:

The Pilot View Drive Community is very supportive of a connector non-motorized hiking and equestrian trail between their neighborhood and Rattlesnake Bar through the development. Such a trail would connect the American River Conservancy's newly acquired easement on the Garland Ranch (North) and the American River Recreation Area, both to the north, with Pilot View Drive and potentially the South Fork American Trails to the south. Future connections to the south could possibly include Safari Estates, Gallagher Road, or the El Tee Ranch, which could connect to the public lands to the east.

Agricultural Resources

The property has been historically grazed and grazed successfully by several parties. The Ag Commission made the finding that the parcel had been used for grazing and recommended the site continue to be protected as historic grazing land, as well as making the observation that the soils on the property are officially recognized as being able to sustain grazing and are suitable for grazing per the soil survey. Testimony by Matlock and Bacchi indicates several people grazed livestock (Matlock, Bacchi, Dobis,

and Garland) successfully over the years. The economic analysis supplied by the applicant is unrealistic (see details in testimony to the Planning Commission). Changing land use from Agricultural to Estate will remove agricultural land and this impact is significant. This could also lead to additional agricultural parcels adjacent to this development to attempt to move from grazing to houses.

Thank you for considering our concerns:

There are about 50 developed parcels of the 72 parcels that are within the Pilot View Drive Zone of Benefit. With more immediate neighbors yet to come in addition to the proposed Sundance development, potential traffic and groundwater impacts to existing residents are big concerns.

Considering the current recommendations and reports before the Board, traffic and water supply are potentially significant impacts. Such impacts would appear to require more than a mitigated negative declaration in terms of environmental documentation.

Thank you for your consideration. As always, you can reach me by e-mail or contact me at (530) 823-7079 if you have questions or if I can clarify any details

Sincerely,

A handwritten signature in blue ink that reads "Bill Bennett". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Bill Bennett

Enclosures