

From: Bianca L. Dinkler
Sent: Monday, September 23, 2024 5:36 PM
To: BOS-Clerk of the Board
Subject: Fw: Appeal for Tentative Parcel Map P24-0009

Bianca Dinkler
Senior Planner

LATE DISTRIBUTION

DATE 9-24-24

County of El Dorado
Planning and Building Department
2850 Fairlane Court, Building C
Placerville, CA 95667
Bianca.Dinkler@edcgov.us
(530) 621-5355 Main | (530) 621-5875 Direct



From: Bill <bstatti@gmail.com>
Sent: Monday, September 23, 2024 5:11 PM
To: Bianca L. Dinkler <Bianca.Dinkler@edcgov.us>
Subject: Appeal for Tentative Parcel Map P24-0009

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Dear Ms. Dinkler,

I hope this message finds you well.

I am writing to oppose the approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. This project exemplifies piecemeal development—a method used to avoid comprehensive environmental review by splitting larger projects into smaller parts. I respectfully urge the Board to overturn this decision due to the significant environmental, public safety, and planning concerns it raises, as well as its inconsistency with the county's General Plan.

The developer, Affirmed Housing Group, is attempting to bypass the California Environmental Quality Act (CEQA) by dividing the parcel into smaller lots, a clear case of "piecemealing" to avoid proper scrutiny. This decision enables the developer to bypass protections designed to safeguard sensitive habitats, including wetlands that are vital to the local ecosystem.

Given the presence of protected species such as the White-tailed Kite, the yellow-legged frog, and wetlands the project should not qualify for a CEQA exemption. Courts have repeatedly ruled against

developers who try to evade environmental oversight through segmentation, and I urge the Board to follow these legal precedents by rejecting the map.

Public safety is also at risk. The approval of this parcel split will pave the way for high-density development without proper infrastructure to accommodate increased traffic. With Green Valley Elementary School nearby, the lack of a traffic study poses serious risks to students and the broader community. Additionally, this area is classified as a high fire-risk zone, and increasing population density without adequate evacuation routes and emergency services would endanger residents.

Furthermore, this development contradicts the county's General Plan. The parcel is zoned for commercial use to serve the surrounding residential community. Allowing high-density residential construction in this area would not only disrupt the intended land use but also diminish opportunities for future commercial services that local residents rely on.

For these reasons, I urge the Board to reconsider and overturn the approval of Tentative Parcel Map P24-0009. Moving forward with this project would set a harmful precedent for future developments by encouraging the use of loopholes to evade proper environmental review and community involvement.

Thank you for considering these critical concerns. I trust the Board will prioritize the long-term interests of the community and environment by rejecting this parcel map.

Bill Statti
Rescue, CA
bstatti@gmail.com

From: Bianca L. Dinkler
Sent: Monday, September 23, 2024 5:36 PM
To: BOS-Clerk of the Board
Subject: Fw: Appeal for Tentative Parcel Map P24-0009

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Planning and Building Department
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Placerville, CA 95667
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From: Susan <susanstatti@gmail.com>
Sent: Monday, September 23, 2024 5:06 PM
To: Bianca L. Dinkler <Bianca.Dinkler@edcgov.us>
Subject: Appeal for Tentative Parcel Map P24-0009

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Dear Ms. Dinkler,

I am writing to appeal the approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. This map is an attempt at "piecemeal development" to bypass thorough environmental review under CEQA. Courts have repeatedly ruled against such practices, and I urge the Board to disapprove of this map.

The approval of this map would enable development that poses significant risks to the environment, including the destruction of wetlands and sensitive habitats, while also creating public safety hazards for the local community, especially near Green Valley Elementary School. Without a traffic study or mitigation measures, this area could face severe impacts from increased traffic and potential evacuation challenges in a high-fire-risk zone.

Furthermore, granting this parcel split would violate El Dorado County's General Plan, as it would replace crucial commercial zoning with high-density residential development, robbing the community of essential services.

I respectfully ask that you vote to overturn the Zoning Administrator's decision and protect the community from the detrimental effects of this project.

Thank you,

Susan Statti
Rescue, CA
susanstatti@gmail.com
916-606-5366

From: BOS-District I
Sent: Monday, September 23, 2024 5:53 PM
To: BOS-Clerk of the Board
Subject: FW: Opposition to the Bass Lake Apartments

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: Gary Patrick <garoldpatrick@gmail.com>
Sent: Monday, September 23, 2024 4:57 PM
To: BOS-District I <bosone@edcgov.us>
Subject: Opposition to the Bass Lake Apartments

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We need to stop this development. Cramming in a three-story building in the middle of Kevin Park is ridiculous

Honorable Garold Patrick

From: Alex Gaudy <alexgaudy24@gmail.com>
Sent: Monday, September 23, 2024 6:18 PM
To: BOS-Clerk of the Board
Cc: BOS-District I; BOS-District II; BOS-District III; BOS-District IV; BOS-District V
Subject: Appeal for tentative parcel map P24-0009

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Dear Members of the El Dorado County Board of Supervisors and Planning Department,

I am writing regarding the proposed Bass Lake Family Apartments development, which is scheduled for a public hearing on September 24th at 3:30 PM.

I am writing to appeal the approval of Tentative Parcel Map P24-0009, which was approved on August 21, 2024. This decision is concerning for many reasons:

1. **Environmental Risks:** Environmental risks and concerns have not been fully and lawfully addressed, particularly regarding the clear-cutting of a 5-acre oak forest and building over creek beds.
2. **Traffic and Safety Concerns:** The project will result in a significant increase in traffic on Foxmore Lane, especially around Green Valley Elementary School, creating a dangerous situation for students walking or being dropped off. Emergency vehicle access has also not been adequately addressed, as the only entrance and exit from the proposed units is onto a residential street.
3. **Crime and Public Safety Concerns:** The proposed development raises safety concerns, particularly due to the proximity to Green Valley Elementary School. Studies have shown an increase in crime, including violent crime, in high-density, low-income housing areas. Given the school's location directly across the street, we believe these concerns should be taken into consideration.
4. **Lack of Services for Residents:** The necessary services for lower-income populations, such as medical facilities, grocery stores, public transportation, and social services, are not readily available in the area.
5. **Impact on Infrastructure and Zoning:** The approval undermines the El Dorado County General Plan, which has designated this property for commercial use. A high-density residential development would not only strain local infrastructure but also eliminate critical commercial zoning intended to serve our growing community.

The zoning administrator approved the lot split for this project last month despite strong opposition from 60-70 local residents, including parents, former Green Valley Elementary employees, civil engineers, and firefighters. Their testimonies highlighted the serious risks posed by increased traffic and environmental damage. We believe this approval has no legal standing due to non-compliance with environmental regulations under CEQA and that the developer may be attempting to sidestep regulations.

Our group, now organized as the Bass Lake Apartments Opposition Alliance (BLAOA), has submitted an appeal outlining these concerns. We believe responsible and sustainable development can only occur with a thorough consideration of the safety of our community and protection of our local environment.

We kindly request your attention to this matter at the upcoming public hearing. We strongly believe that this development should be located in a more suitable area that does not carry the same risks, while still benefiting low-income families.

Thank you for your time and consideration.

Alex Gaudy

From: Cheri Prostler <cprostler@gmail.com>
Sent: Monday, September 23, 2024 6:42 PM
To: BOS-Clerk of the Board; bosone@edcgov.net; bostwo@edcgov.net;
bosthree@edcgov.net; bosfour@edcgov.net; bosfive@edcgov.net;
Bianca.dinkler@edcgov.net
Subject: Bass Lake Apartments Proposal

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Cheri Prostler
3174 Weymouth Way
Rescue, Ca 95672
Cprostler@gmail.com
(530)677-5088

9/23/24

El Dorado County Board of Supervisors
330 Fair Lane Bldg A
Placerville, Ca 95667

Dear Honorable Supervisors,

I am writing to express my concerns regarding the proposed low-income apartment complex at the corner of Foxmore Lane and Bass Lake Road. While I fully recognize the importance of affordable housing and support efforts to address the housing needs in our community, I believe that this particular location is not a suitable choice for such a project.

First and foremost, the environmental impact of this project cannot be ignored. The proposed development site would invade natural spaces, including trees, water flow areas, wetlands, and habitats for local wildlife. Preserving these ecosystems is essential to maintaining the environmental balance and natural beauty that our community values.

In addition to the environmental concerns, the location of this complex raises significant safety and traffic issues. The proposed development is situated on a narrow street directly across from an elementary school. As a resident of Sierra Crossing, I can personally attest to the chaotic traffic conditions during school hours, with cars and pedestrians congesting the area several times a day. The influx of additional residents would only exacerbate these traffic problems, making it even more challenging for local residents to safely enter and exit our community. The current infrastructure simply does not support the increased demand that a large apartment complex would create.

Furthermore, there are no public transportation options in this area, nor are there nearby government or social assistance offices that would serve the needs of potential residents of a low-income housing project. The lack of nearby grocery stores and job opportunities further emphasizes the impracticality of this location for a development intended to support low-income families.

Another major concern is the impact on our homeowners' association (HOA). Our HOA maintains a walking trail behind our homes, which is a private amenity for our residents. However, we worry that the construction of a nearby

apartment complex will attract non-residents to our trail, causing disruptions and placing additional strain on HOA resources.

In conclusion, while I support the need for more housing options in El Dorado County, this location is ill-suited for such a development. The environmental impact, traffic and safety concerns, lack of accessible services, and the strain on our community infrastructure all point to the conclusion that this project is not viable in its current proposed location. I urge the Board of Supervisors to deny this proposal and seek a more appropriate location for the development of affordable housing that better serves both future residents and the current community.

Thank you for your consideration of these concerns.

Sincerely,
Cheri Prostler
Sierra Crossing Community Resident

From: Robin Tully <robin@tullygroup.com>
Sent: Monday, September 23, 2024 7:15 PM
To: BOS-Clerk of the Board
Subject: Fwd: Bass Lake Family Apartments - Letter of Concern
Attachments: Bass Lake Apartments letter.pdf

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Just making sure I also sent this to you, the Clerk of the Board, thank you

Robin Tully, PE, QSD
President
Tully Consulting Group
(707) 693-1926 Office
(707) 628-4219 Cell

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

From: Robin Tully <robin@tullygroup.com>
Date: Mon, Sep 23, 2024 at 7:11 PM
Subject: Bass Lake Family Apartments - Letter of Concern
To: BOS-District I <bosone@edcgov.us>, BOS-District II <bostwo@edcgov.us>, <bosthree@edcgov.us>, BOS-District IV <bosfour@edcgov.us>, <bosfive@edcgov.us>
Cc: Bianca L. Dinkler <Bianca.Dinkler@edcgov.us>, Ande Flower <Ande.Flower@edcgov.us>, Planning Department <planning@edcgov.us>, <basslakefamilyapartments@edcgov.us>

Dear El Dorado County Board of Supervisors and Planning staff,

I am writing to oppose the approval of this TentativeSubdivision Map / lot split for the Bass Lake Family Apartments.

This is a special parcel with environmentally sensitive habitat for wildlife and many native tree and plant species, including a seasonal wetland and also potentially unmapped "Waters of the State" that could represent the extension of a blue line stream that is mapped immediately across the road on a USGS Quad Map. The developer is exploiting the lot split to avoid mitigating the cumulative environmental impacts of this development, to which I don't think the County has adequately considered. Has a tree survey been provided? Has a Biological Assessment been conducted of the plant and other wildlife species present? This is not the lot that is appropriate for the exploitation of SB330 by this clearly "for profit" developer. This is also a lot where the proposed apartments are "shoe-horned" in within a tight configuration. There has been no attempt at downsizing the overall footprint other than a small wetland parcel that will eventually be starved of natural infiltration water sources once the new development is constructed with significant impervious area.

There are other concerns involving providing a Drainage Easement to the County or Sierra Crossing or HOA for maintenance of existing drainage that comes through the Bass Lake Apartment parcel from Sierra Crossing. The easement has been completely ignored on the Tentative Map.

Nor does this Tentative Map show the required 50 foot undisturbed natural buffer required from Creeks and wetlands from development per the 2022 Construction General Stormwater Permit.

Other concerns are that the surrounding public roads and Foxmore are not capable of handling the ever-increasing traffic during a fire evacuation emergency. Such an issue actually blocked the approval of a recent large proposed development in Truckee at the Palisades due to the local highway being all ready overly impacted during a fire evacuation. These neighborhoods were on watch for a potential mandatory evacuation from a recent fire nearby. Has a traffic study been prepared? Has fire evacuation been considered?

Another issue of concern is that parcels need to be subdivided into legally developable parcels. What has been proposed is a large lot for the development of several very large apartment units with a small unuseable parcel left as the wetland. The only allowed subdivision leaving an unuseable parcel would be if the remainder parcel is dedicated to the County or other allowed nonprofit agency. Has this been duly considered?

Please see the attached letter with some of my original concerns that I have not had any response to.

Thank you

Robin Tully, PE, QSD
President
Tully Consulting Group
(707) 693-1926 Office
(707) 628-4219 Cell

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Ms. Bianca Dinkler, Senior Planner
El Dorado County of El Dorado Planning Department
2850 Fairlane Court, Building C
Placerville, CA 95667
bianca.dinkler@edcgov.us

5/31/2024

RE: Proposed 126 to 128 Unit Bass Lake Family Apartments PA24-0004, Foxmore Ln and Bass Lake Rd, El Dorado County, CA,

Dear Ms. Dinkler,

I hope that this letter finds you well. I am writing to you to ask your department to fully consider the environmental and other impacts of the proposed high-density apartment complex being proposed named Bass Lake Family Apartments, AKA Green Valley Apartments. We urge the County to make sure that the developer follows all applicable environmental regulations and considers adequate mitigation measures to reduce or eliminate negative impacts from the project, in particular to the loss of wildlife habitat, traffic and student safety concerns, light pollution and privacy impacts to adjacent homeowners and impacts to wetland and blue streams and stormwater runoff.

I am a registered professional civil engineer and have been practicing civil and environmental engineering for 24 years. My engineering and stormwater and environmental work experience has included apartments, townhomes, commercial shopping centers, site utilities, parking lots, Caltrans and City and County roadway improvements, Creek Restoration projects, Flood control projects, Trail and Park improvements, Stormwater detention ponds and other developments and environmental restoration projects. We have built a niche in Stormwater Pollution Prevention Plans (SWPPPs), Diversion and Dewatering Plans and inspection and monitoring for compliance with the State of California Stormwater Construction General Permit and 401 Water Quality Certifications. We have served as the Qualified SWPPP Developer and Qualified SWPPP Practitioner on over 1,000 completed projects in Northern California, including projects in and for El Dorado County.

According to the El Dorado Chapter of the California Native Plant Society Website (<https://eldoradocnps.org/about-us/el-dorado-county/ecology/>), El Dorado County is a very botanically rich area that supports over 7,000 types of plants. The elevation in Rescue supports Woodland Chaparral habitat. There are two oak trees at 3621 Foxmore Lane (adjacent to the proposed apartment complex), that an arborist identified as 300 to 400 years old. There are dozens of oak trees and other trees on the proposed apartment parcel that are not identified on the Topographical survey or the Developer's Site plan. **The Site Plan does not call out to**

Tully Consulting Group | TullyGroup.com | (707) 693-1926
1650 North Lincoln Street, Suite A Dixon, CA 95620



save any of the existing trees or established vegetation, other than saving a small portion of the site in the northwest corner of the property that is identified as a wetland. We urge the County to require to preserve a portion of the existing trees and any native plant species, especially any well established trees or potential heritage trees.

We urge the County to require the Developer to provide the proper studies, if you haven't all ready, to identify and mitigate potential environmental and other impacts, including but not limited to;

1. Water, Sewer and Drainage Studies
2. Traffic Study
3. Biological Survey
4. Wetland Survey
5. Tree and Native Plant Survey
6. Archaeological Survey

Per the on the United States Geological Survey (USGS) Quad Map, there is a blue line stream on the north side of Green Valley Road immediately north of the property. There is an existing drainage channel within the existing 5 acre site that drains to the west and northwest portion of the property, crosses under Green Valley Road via a culvert and connects into the blue line stream. The blue line stream flows westerly through the Travois Circle area and ultimately connects with Green Spring Creek. The developer has identified potential wetland habitat on their site plan along the existing drainage channel. It is possible that this drainage channel is also potentially an extension of the blue line stream and a wetland, which would make it a potential Waters of the State subject to additional protection measures.

This project will disturb more than 1 acre of soil, thus it will be subject to the 2022 Stormwater Construction General Permit (CGP), ORDER WQ 2022-0057-DWQ NPDES NO. CAS000002. The CGP requires projects to preserve natural creek habitat by providing 50-foot undisturbed natural buffers from the edge of the disturbed area to the top of bank. **I recommend that the Central Valley Regional Water Quality Control Board, US Fish and Wildlife, California Department of Fish and Wildlife be consulted for potential wildlife, wetland and receiving water body impacts by the project and that a 50 foot undisturbed natural buffer be provided for any wetland or blue line streams (mapped or unmapped) on or adjacent to the property.**

This project will also significantly increase the amount of impervious surface on the parcel which is currently undeveloped. The increase in impervious surface will increase the rate and volume of stormwater runoff from the project that could pose an erosion and flooding risk to the water course that runs through the property and up against the home at 3621 Foxmore Lane. This development cumulatively with other existing and future developments, could in turn cause erosion and flooding risks to the aforementioned blue line stream and downstream



Green Spring Creek. Rough drainage estimates (Attachment A), show that peak runoff rates in a 100 year event could increase threefold and potential runoff volumes could increase fourfold.

The developer has shown very small bioretention areas on their Site Plan that do not appear adequate for the high amount of new impervious surfacing being proposed. Per the 2022 CGP, dischargers must install post construction low impact development measures so that stormwater runoff rates and volumes do not exceed pre-existing amounts. Please make sure that the Developer provides an adequate drainage study detailing exactly how they plan to mitigate stormwater discharges. **In addition to providing water quality enhancements, I urge you to require the developer to provide a stormwater detention pond in the westerly portion of the property (where the site currently drains to) to make sure that stormwater peak flows are mitigated to be no more than pre-existing peak flows during the 2, 10, 50 and 100 year events.**

From a traffic perspective, this development will increase traffic on the all ready busy Green Valley Road and Bass Lake Road. This, along with School traffic, will only exacerbate traffic and parking demands, especially along Foxmore Ln where the development will be across the street from the School. The increase traffic may warrant a stop light at Foxmore Ln and Basslake Rd and turn lane improvements. **I recommend to require traffic mitigations from the developer that might include any necessary roadway widening, turn lanes or stop lights at these and any other affected public roads.**

The proposed 2 story and 3 story buildings will create light pollution and also visually impair the views and privacy of the homeowner at 3621 Foxmore Ln, potentially also significantly decreasing their home's comfortability and value. This site plan does not show any "stepped" type grading, so it is likely that the west most 2 story apartment building will be on a pad at an elevation closer to the elevation of the other proposed buildings, and thus much higher than the existing home at 3621 Foxmore Lane. This means that in reality the 2 story building will be elevated several feet above the adjacent parcel for flooding and grading concerns that will make the overall height even greater in comparison to the existing home. **I recommend that the west most 2 story building be eliminated for privacy and height concerns and open space considerations. I also recommend requiring the developer to put up "story poles" showing each buildings footprint and total height for public review and comment.**

Per normal Building Codes, new developments can not impede or impact the drainage of adjacent parcels. The proposed apartment lot contains a drainage ditch on the west side behind 3621 Foxmore Lane that collects runoff from 3621 Foxmore Lane, the proposed apartment lot, and draingae from the Sierra Crossing Subdivision. This existing drainage ditch is showing signs of erosion and also it is very shallow and likely undersized. **I recommend that the developer improve the existing ditch capacity and also provide the County or Sierra**



Crossing Subdivision a minimum 20 foot wide drainage easement for access to this for cleaning and maintenance.

I know that housing in California is at a critical shortage, so I understand the difficult position the County must be in with reviewing developments like this. I hope that you will kindly give all due consideration to the potential environmental impacts and allow more time for proper environmental studies to be conducted and to obtain stakeholder input before approving this project.

Sincerely,

Robin Tully

Robin Tully, PE, QSD

Attachments:

Attachment A – Drainage Estimates

Attachment B – USGS Quad Map

Attachment C – Google Aerial View

Attachment D – Surface Water Buffer excerpt from the 2022 Construction Stormwater General Permit



Attachment A – Drainage Estimates

Bass Lake Apartments
 Rough Drainage Calculations

Q = CIA Peak Flow Calculation using Rational Method

Assuming 15 minute time of concentration

Q (cfs)	C	I (in/hr)	A (acres)	Q (cfs)
Preconstruction 100 yr event	0.2	0.62	5.682	0.7
Postconstruction 100 yr event	0.85	0.62	5.682	3.0
Preconstruction 50 yr event	0.2	0.55	5.682	0.6
Postconstruction 50 yr event	0.85	0.55	5.682	2.7
Preconstruction 2 yr event	0.2	0.284	5.682	0.3
Postconstruction 2 yr event	0.85	0.284	5.682	1.4

Runoff Volumes

Assuming 24 hour rain totals	C	Daily total (inches)	A (acres)	Volume (cf)	Volume (gallons)
Preconstruction 100 yr event	0.2	6.3	5.682	25988	194393
Postconstruction 100 yr event	0.85	6.3	5.682	110450	826169
Preconstruction 50 yr event	0.2	5.67	5.682	23389	174953
Postconstruction 50 yr event	0.85	5.67	5.682	99405	743552
Preconstruction 2 yr event	0.2	3.03	5.682	12499	93494
Postconstruction 2 yr event	0.85	3.03	5.682	53121	397348



NOAA Atlas 14, Volume 6, Version 2
 Location name: Rescue, California, USA*
 Latitude: 38.6981°, Longitude: -121.0092°
 Elevation: 1325 ft**
 * source: USGS
 ** source: USGS



POINT PRECIPITATION FREQUENCY ESTIMATES

Sana Perica, Sarah Dietz, Sarah Ham, Lilian Hsu, Kazuyuki Matsura, Deborah Martin, Sandra Pukovic, Jaiann Roy, Carl T. Yip, Luke Urrut, Fengjun Yan, Michael Yantis, Tam Ziaja, Geoffrey Benson, Daniel Brewer, Li-Chuan Chen, Tye Parzybok, John Tarcisian

NOAA National Weather Service, Silver Spring, Maryland

05/28/2024 | 25/05/2024 | 0.0003_0.0003

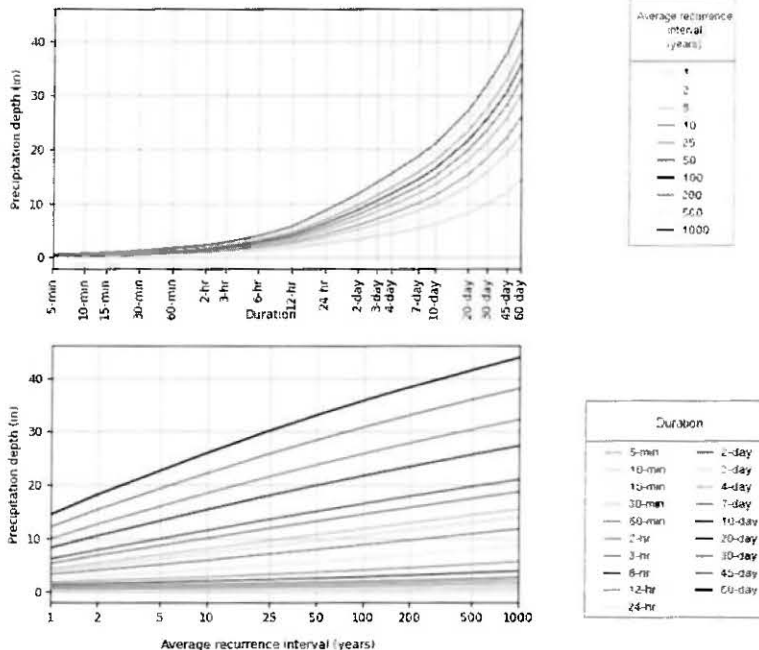
PF tabular

Duration	Average recurrence interval (years)									
	1	2	5	10	25	50	100	200	500	1000
5-min	0.137 (0.115-0.163)	0.164 (0.139-0.195)	0.201 (0.170-0.239)	0.232 (0.195-0.279)	0.279 (0.227-0.345)	0.317 (0.254-0.400)	0.358 (0.280-0.463)	0.404 (0.308-0.535)	0.471 (0.346-0.649)	0.528 (0.376-0.751)
10-min	0.196 (0.167-0.225)	0.234 (0.199-0.273)	0.287 (0.243-0.343)	0.333 (0.280-0.400)	0.400 (0.328-0.485)	0.454 (0.384-0.574)	0.514 (0.422-0.563)	0.579 (0.442-0.761)	0.676 (0.496-0.930)	0.757 (0.538-1.06)
15-min	0.237 (0.202-0.282)	0.284 (0.241-0.337)	0.348 (0.294-0.415)	0.403 (0.338-0.484)	0.483 (0.394-0.595)	0.550 (0.440-0.683)	0.621 (0.486-0.802)	0.700 (0.534-0.901)	0.817 (0.600-1.12)	0.919 (0.651-1.30)
30-min	0.328 (0.278-0.390)	0.392 (0.332-0.466)	0.480 (0.407-0.573)	0.557 (0.468-0.668)	0.667 (0.544-0.821)	0.759 (0.607-0.958)	0.858 (0.671-1.11)	0.968 (0.738-1.26)	1.13 (0.831-1.55)	1.26 (0.899-1.82)
60-min	0.459 (0.370-0.545)	0.548 (0.463-0.652)	0.672 (0.569-0.801)	0.779 (0.655-0.936)	0.934 (0.762-1.16)	1.09 (0.900-1.34)	1.20 (0.949-1.59)	1.35 (1.03-1.79)	1.58 (1.19-2.17)	1.77 (1.28-2.50)
2-hr	0.579 (0.477-0.696)	0.796 (0.632-0.947)	0.959 (0.812-1.14)	1.10 (0.924-1.32)	1.30 (1.06-1.61)	1.49 (1.17-1.89)	1.63 (1.28-2.12)	1.83 (1.40-2.43)	2.12 (1.57-2.81)	2.35 (1.73-3.34)
3-hr	0.648 (0.521-0.81)	0.900 (0.695-1.19)	1.18 (1.00-1.41)	1.35 (1.14-1.62)	1.59 (1.30-1.97)	1.78 (1.43-2.25)	1.99 (1.56-2.57)	2.22 (1.69-2.93)	2.54 (1.85-3.50)	2.81 (2.00-3.59)
6-hr	1.26 (1.07-1.50)	1.46 (1.24-1.74)	1.74 (1.49-2.08)	1.98 (1.67-2.38)	2.32 (1.94-2.87)	2.59 (2.07-3.27)	2.88 (2.26-3.71)	3.18 (2.43-4.22)	3.62 (2.66-4.93)	3.98 (2.83-5.24)
12-hr	1.77 (1.50-2.10)	2.08 (1.73-2.47)	2.50 (2.12-2.98)	2.85 (2.40-3.43)	3.35 (2.73-4.18)	3.75 (3.00-4.73)	4.16 (3.26-5.37)	4.60 (3.51-6.10)	5.23 (3.64-7.00)	5.74 (4.06-8.15)
24-hr	2.62 (2.34-2.89)	3.03 (2.59-3.48)	3.71 (3.28-4.27)	4.28 (3.74-4.96)	5.08 (4.31-6.06)	5.57 (4.73-6.94)	6.30 (5.14-7.90)	6.97 (5.53-9.07)	7.90 (6.02-10.6)	8.64 (6.37-12.0)
2-day	3.35 (2.98-3.85)	4.14 (3.64-4.76)	5.16 (4.57-6.04)	5.98 (5.26-6.94)	7.05 (6.03-8.46)	7.93 (6.82-9.70)	8.78 (7.46-11.0)	10.9 (9.06-12.4)	11.8 (9.27-14.5)	11.8 (8.62-16.3)
3-day	3.93 (3.50-4.51)	4.93 (4.38-5.66)	6.19 (5.42-7.11)	7.20 (6.33-8.30)	8.53 (7.37-10.2)	9.54 (8.26-11.7)	11.6 (9.89-13.2)	12.9 (10.7-14.9)	14.0 (12.1-16.5)	14.0 (10.3-19.3)
4-day	4.36 (3.88-5.00)	5.51 (4.89-6.35)	6.95 (6.13-8.00)	8.09 (7.11-9.39)	9.58 (8.36-11.3)	10.7 (9.33-13.1)	11.8 (10.2-14.9)	14.4 (12.1-16.5)	15.5 (12.8-19.2)	15.5 (11.4-21.4)
7-day	5.39 (4.80-6.18)	6.85 (6.08-7.86)	8.65 (7.57-9.96)	10.1 (8.84-11.7)	11.9 (10.4-14.2)	13.2 (11.5-15.1)	14.5 (13.1-16.1)	17.4 (15.2-20.3)	19.7 (17.3-22.4)	19.7 (15.2-25.9)
10-day	6.17 (5.49-7.08)	7.86 (6.98-9.00)	9.92 (8.65-11.4)	11.5 (10.1-13.4)	13.5 (11.9-16.2)	15.0 (13.1-18.4)	16.5 (14.2-21.0)	19.9 (17.2-23.0)	21.0 (16.3-28.4)	21.0 (15.9-29.2)
20-day	8.23 (7.33-9.44)	10.5 (9.38-12.1)	13.3 (11.8-15.3)	15.4 (13.5-17.3)	18.0 (16.4-21.8)	19.9 (18.0-24.4)	21.7 (19.7-27.2)	25.7 (23.0-30.2)	25.7 (19.8-34.4)	27.3 (20.7-37.8)
30-day	9.34 (8.34-11.4)	12.7 (11.3-14.6)	16.0 (14.2-18.4)	18.5 (16.2-21.4)	21.8 (19.4-26.3)	23.8 (21.3-29.1)	25.9 (23.1-32.4)	31.9 (28.1-38.2)	32.4 (23.4-43.7)	32.2 (23.7-44.3)
45-day	12.1 (10.9-13.8)	16.4 (15.2-17.7)	19.3 (17.1-22.0)	22.2 (19.6-26.9)	25.9 (22.3-31.0)	28.4 (25.7-34.7)	30.8 (28.1-36.5)	33.1 (31.2-40.3)	38.0 (34.4-46.2)	38.0 (29.0-50.7)
60-day	14.4 (13.3-16.6)	18.2 (16.2-20.8)	22.7 (20.1-26.1)	26.0 (23.4-30.2)	30.2 (26.7-36.1)	33.0 (29.4-40.4)	35.7 (32.4-44.7)	38.3 (34.4-48.3)	41.5 (36.5-53.1)	43.8 (32.5-60.7)

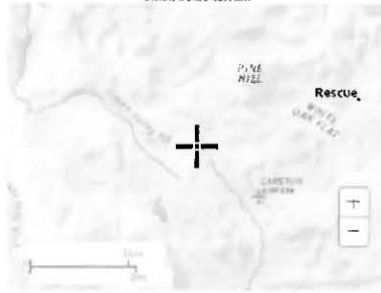
Precipitation frequency (PF) estimates with a table are based on frequency analysis of partial duration series (PDS). Numbers in parentheses are PF estimates at lower and upper bounds of the 90% confidence interval. The quantity that precipitation frequency estimates for a given duration and average recurrence interval will be greater than the upper bound, or less than the lower bound, is 0.4. Estimates at upper bounds are not the red annual probable maximum precipitation (PMP) estimates and may be higher than currently valid PMP values. Please refer to NOAA Atlas 14 document for more information.

PF graphical

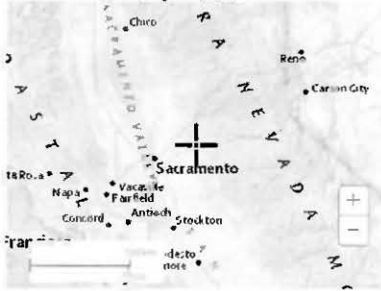
PDS-based depth-duration-frequency (DDF) curves
 Latitude 38.6981°, Longitude -121.0092°



Small scale terrain



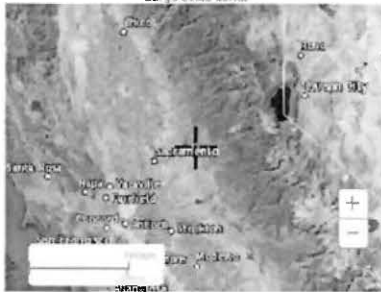
Large scale terrain



Large scale map



Large scale aerial



Blank map



Attachment B – USGS Quad Map



Potential blue line stream, unmapped
The blue line stream connects to Green Spring Creek



Attachment C – Google Aerial View

3621 Foxmore Ln





Attachment D – Surface Water Buffer excerpt from the 2022 Construction Stormwater General Permit

II.G. Surface Water Buffer⁵

- II.G.1. Dischargers shall provide and maintain natural buffers and/or equivalent erosion and sediment controls when a water of the U.S. is located within 50 feet of the site's earth disturbances, unless infeasible.
- II.G.2. Dischargers shall comply with one of the following alternatives for any discharges to waters of the U.S. located within 50 feet of a site's earth disturbances:
- a. Provide and maintain a 50-foot undisturbed natural buffer from the edge of the disturbed area to the top of bank;
 - b. Provide and maintain an undisturbed natural buffer that is less than 50 feet and is supplemented by erosion and sediment controls that achieve, in combination, the sediment load reduction equivalent to a 50-foot undisturbed natural buffer. The equivalent sediment load may be calculated using RUSLE2 or another method approved by the Regional Water Board; or
 - c. Implement erosion and sediment controls to achieve the sediment load reduction equivalent to a 50-foot undisturbed natural buffer when infeasible to provide and maintain an undisturbed natural buffer of any size. The equivalent sediment load may be calculated using RUSLE2 or another method approved by the Regional Water Board.

II.H. Pesticide Application

Dischargers shall only apply pesticides that have been authorized for use through California Department of Pesticide Regulation. The application of pesticides shall follow manufacturer's guidance.

II.I. Demolition of Existing Structure

Dischargers shall prevent exposing demolition materials to precipitation. Demolition materials should be covered with an impermeable barrier such as, but not limited to, plastic sheeting prior to precipitation to prevent known contaminants from being mobilized. Dischargers unable to cover demolished material that were not previously investigated or found to be absent of applicable pollutants in reportable quantities shall sample for any non-visible pollutants that may be in stormwater

⁵ The surface water buffer requirements apply to work above the top-of-bank or high-water level of waters of the United States. Work within a channel or streambed (water body-dependent construction), Clean Water Act § 404 projects with a § 401 certification, and projects where no natural surface buffer exists (e.g., concrete channelization) are exempt from the requirements. All types of in-channel work may be regulated under § 401 (Clean Water Act - Regional Boards), § 404 (Clean Water Act - Army Corps of Engineers), or §1602 (California Fish and Game Code).

From: BOS-District I
Sent: Tuesday, September 24, 2024 6:55 AM
To: BOS-Clerk of the Board
Subject: FW: Appeal for Tentative Parcel Map P24-0009

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: Jenny Vitt <jennyv@pacbell.net>
Sent: Monday, September 23, 2024 6:27 PM
To: BOS-District I <bosone@edcgov.us>; BOS-District II <bostwo@edcgov.us>; BOS-District III <bosthree@edcgov.us>; BOS-District IV <bosfour@edcgov.us>; BOS-District V <bosfive@edcgov.us>
Subject: Appeal for Tentative Parcel Map P24-0009

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Report Suspicious

Dear Members of the Board of Supervisors,

I am writing to express my strong opposition to the approval of Tentative Parcel Map P24-0009, which was approved on August 21, 2024. This map represents a clear case of piecemeal development, a tactic used to divide projects in order to avoid proper environmental review. I urge the Board to overturn this decision and reject the parcel map due to its environmental and public safety risks, as well as its inconsistency with the county's General Plan.

The developer, Affirmed Housing Group, is attempting to bypass the California Environmental Quality Act (CEQA) by dividing the parcel into smaller lots. This maneuver, known as "piecemealing," is specifically designed to avoid the thorough environmental analysis that would be required for a larger project. By approving this map, the county is allowing the developer to sidestep critical protections that ensure the environment is safeguarded, particularly when sensitive habitats like wetlands are involved.

The presence of wetlands and wildlife on the parcel should disqualify this project from any CEQA exemption. Future development under SB330 and AB2011 would destroy habitats for species such as the White-tailed Kite and the yellow-legged frog, which are protected under California law. The developer has acknowledged that this map is intended to isolate sensitive habitat, which is a thinly veiled attempt to circumvent environmental oversight. Courts have repeatedly ruled that developers cannot escape CEQA review through segmentation, and I urge the Board to uphold these legal precedents by rejecting this map.

Public safety is also a critical concern. The approval of this parcel split will facilitate future high-density development without the necessary infrastructure improvements to handle increased traffic. Green Valley Elementary School is

located near the site, and without a traffic study or mitigation plan, the risks to students, parents, and staff will increase significantly. The area is already heavily impacted by traffic, and adding more residents without adequate planning will only make the situation worse. Additionally, the surrounding community is located in a high fire-risk zone, and any increase in population will strain evacuation routes and emergency services. These safety risks should not be overlooked.

Further, this map is inconsistent with the county's General Plan. The parcel in question is currently zoned for commercial use, which is intended to serve the surrounding residential community. Approving this map would allow the construction of high-density residential housing in an area that was meant to provide essential commercial services to local residents. This shift in land use would not only increase the demand for those services but also remove the opportunity to provide them in the future, harming the long-term development of the area.

Given these environmental, safety, and planning concerns, I respectfully request that the Board of Supervisors overturn the Zoning Administrator's approval of Tentative Parcel Map P24-0009. Allowing this project to move forward would set a harmful precedent for future developments in the county, encouraging developers to divide projects to avoid meaningful environmental review and community input. The risks to the environment and public safety, as well as the violation of the General Plan, are too significant to ignore.

I trust the Board will consider the broader implications of this decision and act in the best interests of the community and the environment by disapproving this parcel map.

Thank you for your time and consideration.

Respectfully,
Jennifer Vitt

Sent from AT&T Yahoo Mail on Android

From: BOS-District I
Sent: Tuesday, September 24, 2024 6:55 AM
To: BOS-Clerk of the Board
Subject: FW: Bass Lake Family Apartments - Letter of Concern
Attachments: Bass Lake Apartments letter.pdf

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: Robin Tully <robin@tullygroup.com>
Sent: Monday, September 23, 2024 7:11 PM
To: BOS-District I <bosone@edcgov.us>; BOS-District II <bostwo@edcgov.us>; BOS-District III <bosthree@edcgov.us>; BOS-District IV <bosfour@edcgov.us>; BOS-District V <bosfive@edcgov.us>
Cc: Bianca L. Dinkler <Bianca.Dinkler@edcgov.us>; Ande Flower <Ande.Flower@edcgov.us>; Planning Department <planning@edcgov.us>; PB-Bass Lake Family Apartments <basslakefamilyapartments@edcgov.us>
Subject: Bass Lake Family Apartments - Letter of Concern

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Report Suspicious

Dear El Dorado County Board of Supervisors and Planning staff,

I am writing to oppose the approval of this TentativeSubdivision Map / lot split for the Bass Lake Family Apartments.

This is a special parcel with environmentally sensitive habitat for wildlife and many native tree and plant species, including a seasonal wetland and also potentially unmapped "Waters of the State" that could represent the extension of a blue line stream that is mapped immediately across the road on a USGS Quad Map. The developer is exploiting the lot split to avoid mitigating the cumulative environmental impacts of this development, to which I don't think the County has adequately considered. Has a tree survey been provided? Has a Biological Assessment been conducted of the plant and other wildlife species present? This is not the lot that is appropriate for the exploitation of SB330 by this clearly "for profit" developer. This is also a lot where the proposed apartments are "shoe-horned" in within a tight configuration. There has been no attempt at downsizing the overall footprint other than a small wetland parcel that will eventually be starved of natural infiltration water sources once the new development is constructed with significant impervious area.

There are other concerns involving providing a Drainage Easement to the County or Sierra Crossing or HOA for maintenance of existing drainage that comes through the Bass Lake Apartment parcel from Sierra Crossing. The easement has been completely ignored on the Tentative Map.

Nor does this Tentative Map show the required 50 foot undisturbed natural buffer required from Creeks and wetlands from development per the 2022 Construction General Stormwater Permit.

Other concerns are that the surrounding public roads and Foxmore are not capable of handling the ever-increasing traffic during a fire evacuation emergency. Such an issue actually blocked the approval of a recent large proposed development in Truckee at the Palisades due to the local highway being all ready overly impacted during a fire evacuation. These neighborhoods were on watch for a potential mandatory evacuation from a recent fire nearby. Has a traffic study been prepared? Has fire evacuation been considered?

Another issue of concern is that parcels need to be subdivided into legally developable parcels. What has been proposed is a large lot for the development of several very large apartment units with a small unuseable parcel left as the wetland. The only allowed subdivision leaving an unuseable parcel would be if the remainder parcel is dedicated to the County or other allowed nonprofit agency. Has this been duly considered?

Please see the attached letter with some of my original concerns that I have not had any response to.

Thank you

Robin Tully, PE, QSD

President

Tully Consulting Group

(707) 693-1926 Office

(707) 628-4219 Cell

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Ms. Bianca Dinkler, Senior Planner
El Dorado County of El Dorado Planning Department
2850 Fairlane Court, Building C
Placerville, CA 95667
bianca.dinkler@edcgov.us

5/31/2024

RE: Proposed 126 to 128 Unit Bass Lake Family Apartments PA24-0004, Foxmore Ln and Bass Lake Rd, El Dorado County, CA,

Dear Ms. Dinkler,

I hope that this letter finds you well. I am writing to you to ask your department to fully consider the environmental and other impacts of the proposed high-density apartment complex being proposed named Bass Lake Family Apartments, AKA Green Valley Apartments. We urge the County to make sure that the developer follows all applicable environmental regulations and considers adequate mitigation measures to reduce or eliminate negative impacts from the project, in particular to the loss of wildlife habitat, traffic and student safety concerns, light pollution and privacy impacts to adjacent homeowners and impacts to wetland and blue streams and stormwater runoff.

I am a registered professional civil engineer and have been practicing civil and environmental engineering for 24 years. My engineering and stormwater and environmental work experience has included apartments, townhomes, commercial shopping centers, site utilities, parking lots, Caltrans and City and County roadway improvements, Creek Restoration projects, Flood control projects, Trail and Park improvements, Stormwater detention ponds and other developments and environmental restoration projects. We have built a niche in Stormwater Pollution Prevention Plans (SWPPPs), Diversion and Dewatering Plans and inspection and monitoring for compliance with the State of California Stormwater Construction General Permit and 401 Water Quality Certifications. We have served as the Qualified SWPPP Developer and Qualified SWPPP Practitioner on over 1,000 completed projects in Northern California, including projects in and for El Dorado County.

According to the El Dorado Chapter of the California Native Plant Society Website (<https://eldoradocnps.org/about-us/el-dorado-county/ecology/>), El Dorado County is a very botanically rich area that supports over 7,000 types of plants. The elevation in Rescue supports Woodland Chaparral habitat. There are two oak trees at 3621 Foxmore Lane (adjacent to the proposed apartment complex), that an arborist identified as 300 to 400 years old. There are dozens of oak trees and other trees on the proposed apartment parcel that are not identified on the Topographical survey or the Developer's Site plan. **The Site Plan does not call out to**

Tully Consulting Group | TullyGroup.com | (707) 693-1926
1650 North Lincoln Street, Suite A Dixon, CA 95620



save any of the existing trees or established vegetation, other than saving a small portion of the site in the northwest corner of the property that is identified as a wetland. We urge the County to require to preserve a portion of the existing trees and any native plant species, especially any well established trees or potential heritage trees.

We urge the County to require the Developer to provide the proper studies, if you haven't all ready, to identify and mitigate potential environmental and other impacts, including but not limited to;

1. Water, Sewer and Drainage Studies
2. Traffic Study
3. Biological Survey
4. Wetland Survey
5. Tree and Native Plant Survey
6. Archaeological Survey

Per the on the United States Geological Survey (USGS) Quad Map, there is a blue line stream on the north side of Green Valley Road immediately north of the property. There is an existing drainage channel within the existing 5 acre site that drains to the west and northwest portion of the property, crosses under Green Valley Road via a culvert and connects into the blue line stream. The blue line stream flows westerly through the Travois Circle area and ultimately connects with Green Spring Creek. The developer has identified potential wetland habitat on their site plan along the existing drainage channel. It is possible that this drainage channel is also potentially an extension of the blue line stream and a wetland, which would make it a potential Waters of the State subject to additional protection measures.

This project will disturb more than 1 acre of soil, thus it will be subject to the 2022 Stormwater Construction General Permit (CGP), ORDER WQ 2022-0057-DWQ NPDES NO. CAS000002. The CGP requires projects to preserve natural creek habitat by providing 50-foot undisturbed natural buffers from the edge of the disturbed area to the top of bank. **I recommend that the Central Valley Regional Water Quality Control Board, US Fish and Wildlife, California Department of Fish and Wildlife be consulted for potential wildlife, wetland and receiving water body impacts by the project and that a 50 foot undisturbed natural buffer be provided for any wetland or blue line streams (mapped or unmapped) on or adjacent to the property.**

This project will also significantly increase the amount of impervious surface on the parcel which is currently undeveloped. The increase in impervious surface will increase the rate and volume of stormwater runoff from the project that could pose an erosion and flooding risk to the water course that runs through the property and up against the home at 3621 Foxmore Lane. This development cumulatively with other existing and future developments, could in turn cause erosion and flooding risks to the aforementioned blue line stream and downstream



Green Spring Creek. Rough drainage estimates (Attachment A), show that peak runoff rates in a 100 year event could increase threefold and potential runoff volumes could increase fourfold.

The developer has shown very small bioretention areas on their Site Plan that do not appear adequate for the high amount of new impervious surfacing being proposed. Per the 2022 CGP, dischargers must install post construction low impact development measures so that stormwater runoff rates and volumes do not exceed pre-existing amounts. Please make sure that the Developer provides an adequate drainage study detailing exactly how they plan to mitigate stormwater discharges. **In addition to providing water quality enhancements, I urge you to require the developer to provide a stormwater detention pond in the westerly portion of the property (where the site currently drains to) to make sure that stormwater peak flows are mitigated to be no more than pre-existing peak flows during the 2, 10, 50 and 100 year events.**

From a traffic perspective, this development will increase traffic on the all ready busy Green Valley Road and Bass Lake Road. This, along with School traffic, will only exacerbate traffic and parking demands, especially along Foxmore Ln where the development will be across the street from the School. The increase traffic may warrant a stop light at Foxmore Ln and Basslake Rd and turn lane improvements. **I recommend to require traffic mitigations from the developer that might include any necessary roadway widening, turn lanes or stop lights at these and any other affected public roads.**

The proposed 2 story and 3 story buildings will create light pollution and also visually impair the views and privacy of the homeowner at 3621 Foxmore Ln, potentially also significantly decreasing their home's comfortability and value. This site plan does not show any "stepped" type grading, so it is likely that the west most 2 story apartment building will be on a pad at an elevation closer to the elevation of the other proposed buildings, and thus much higher than the existing home at 3621 Foxmore Lane. This means that in reality the 2 story building will be elevated several feet above the adjacent parcel for flooding and grading concerns that will make the overall height even greater in comparison to the existing home. **I recommend that the west most 2 story building be eliminated for privacy and height concerns and open space considerations. I also recommend requiring the developer to put up "story poles" showing each buildings footprint and total height for public review and comment.**

Per normal Building Codes, new developments can not impede or impact the drainage of adjacent parcels. The proposed apartment lot contains a drainage ditch on the west side behind 3621 Foxmore Lane that collects runoff from 3621 Foxmore Lane, the proposed apartment lot, and draingae from the Sierra Crossing Subdivision. This existing drainage ditch is showing signs of erosion and also it is very shallow and likely undersized. **I recommend that the developer improve the existing ditch capacity and also provide the County or Sierra**



Crossing Subdivision a minimum 20 foot wide drainage easement for access to this for cleaning and maintenance.

I know that housing in California is at a critical shortage, so I understand the difficult position the County must be in with reviewing developments like this. I hope that you will kindly give all due consideration to the potential environmental impacts and allow more time for proper environmental studies to be conducted and to obtain stakeholder input before approving this project.

Sincerely,

A handwritten signature in cursive script that reads "Robin Tully".

Robin Tully, PE, QSD

Attachments:

Attachment A – Drainage Estimates

Attachment B – USGS Quad Map

Attachment C – Google Aerial View

Attachment D – Surface Water Buffer excerpt from the 2022 Construction Stormwater General Permit



Attachment A – Drainage Estimates

Bass Lake Apartments
 Rough Drainage Calculations

Q = CIA Peak Flow Calculation using Rational Method

Assuming 15 minute time of concentration

Q (cfs)	C	I (in/hr)	A (acres)	Q (cfs)
Preconstruction 100 yr event	0.2	0.62	5.682	0.7
Postconstruction 100 yr event	0.85	0.62	5.682	3.0
Preconstruction 50 yr event	0.2	0.55	5.682	0.6
Postconstruction 50 yr event	0.85	0.55	5.682	2.7
Preconstruction 2 yr event	0.2	0.284	5.682	0.3
Postconstruction 2 yr event	0.85	0.284	5.682	1.4

Runoff Volumes

Assuming 24 hour rain totals	C	Daily total A (acres)	Volume (cf)	Volume (gallons)
		(inches)		
Preconstruction 100 yr event	0.2	6.3	25988	194393
Postconstruction 100 yr event	0.85	6.3	110450	826169
Preconstruction 50 yr event	0.2	5.67	23389	174953
Postconstruction 50 yr event	0.85	5.67	99405	743552
Preconstruction 2 yr event	0.2	3.03	12499	93494
Postconstruction 2 yr event	0.85	3.03	53121	397348



NOAA Atlas 14, Volume 6, Version 2
 Location name: Rescue, California, USA*
 Latitude: 38.6981° Longitude: -121.0092°
 Elevation: 1325 ft**
 * source: ESRI Maps
 ** source: USGS



POINT PRECIPITATION FREQUENCY ESTIMATES

Dan a Penco, Sarah Dietz, Sarah Heim, Lillian Himer, Kazuyuki Mataru, Deborah Martin, Carolina Padgett, Ibrahim Roy, Carl Topylak, Dale Unruh, Fengjin Yan, Michael Yantis, Tian Zhao, Geoffrey Boren, Daniel Brewer, Li-Chuan Chen, Tom Partridge, John Yarnsman

NOAA National Weather Service, Silver Spring, Maryland

PF Tabular | PF Graphical | Maps & Aerials

PF tabular

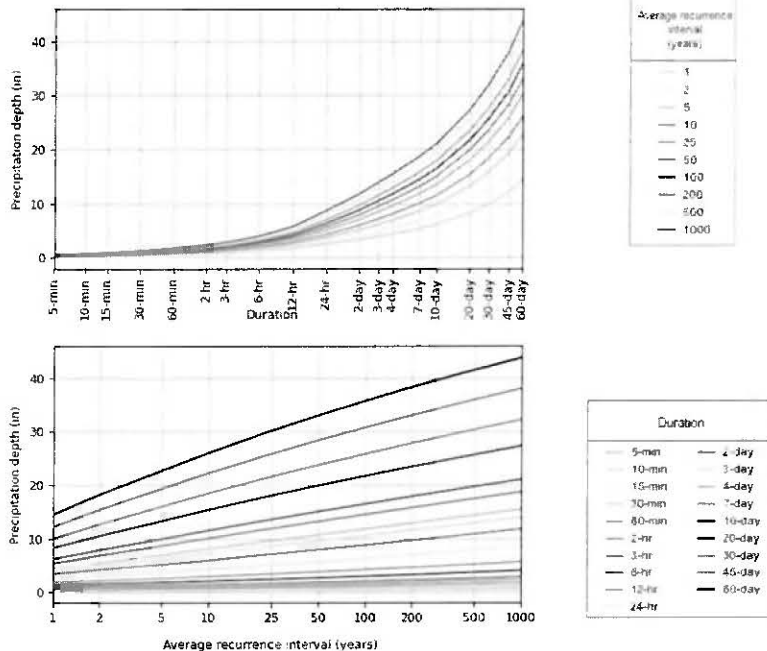
PDS-based point precipitation frequency estimates with 90% confidence intervals (in inches)†

Duration	Average recurrence interval (years)									
	1	2	5	10	25	50	100	500	1000	
5-min	0.137 (0.116-0.162)	0.164 (0.139-0.195)	0.201 (0.170-0.239)	0.232 (0.195-0.276)	0.279 (0.227-0.345)	0.317 (0.254-0.400)	0.358 (0.280-0.463)	0.404 (0.309-0.535)	0.471 (0.348-0.649)	0.528 (0.376-0.751)
10-min	0.196 (0.157-0.233)	0.234 (0.199-0.279)	0.287 (0.243-0.344)	0.333 (0.283-0.400)	0.400 (0.329-0.484)	0.454 (0.384-0.574)	0.514 (0.423-0.663)	0.579 (0.442-0.767)	0.676 (0.498-0.930)	0.757 (0.539-1.06)
15-min	0.237 (0.202-0.262)	0.284 (0.224-0.337)	0.348 (0.294-0.416)	0.402 (0.339-0.484)	0.483 (0.394-0.588)	0.550 (0.450-0.684)	0.621 (0.498-0.807)	0.700 (0.571-0.858)	0.817 (0.629-1.12)	0.916 (0.681-1.30)
30-min	0.328 (0.279-0.390)	0.392 (0.333-0.466)	0.480 (0.407-0.573)	0.557 (0.468-0.666)	0.667 (0.544-0.827)	0.759 (0.607-0.958)	0.859 (0.671-1.11)	0.968 (0.738-1.28)	1.13 (0.83-1.58)	1.26 (0.90-1.83)
60-min	0.459 (0.392-0.545)	0.548 (0.465-0.652)	0.672 (0.569-0.801)	0.779 (0.655-0.936)	0.934 (0.762-1.14)	1.06 (0.850-1.34)	1.20 (0.940-1.55)	1.35 (1.03-1.79)	1.58 (1.16-2.17)	1.77 (1.26-2.52)
2-hr	0.679 (0.577-0.806)	0.796 (0.673-0.947)	0.959 (0.812-1.14)	1.10 (0.924-1.32)	1.30 (1.06-1.61)	1.46 (1.17-1.85)	1.64 (1.29-2.12)	1.83 (1.40-2.42)	2.12 (1.55-2.91)	2.35 (1.67-3.34)
3-hr	0.848 (0.721-1.01)	0.990 (0.840-1.19)	1.18 (1.00-1.41)	1.35 (1.14-1.62)	1.59 (1.30-1.97)	1.78 (1.43-2.25)	1.99 (1.56-2.57)	2.22 (1.69-2.93)	2.54 (1.86-3.50)	2.81 (2.00-3.99)
6-hr	1.26 (1.07-1.50)	1.45 (1.24-1.74)	1.74 (1.49-2.08)	1.98 (1.67-2.38)	2.32 (1.89-2.87)	2.59 (2.07-3.27)	2.88 (2.25-3.71)	3.18 (2.43-4.22)	3.62 (2.66-4.98)	3.98 (2.83-5.68)
12-hr	1.77 (1.50-2.10)	2.08 (1.76-2.47)	2.50 (2.12-2.98)	2.85 (2.40-3.43)	3.35 (2.72-4.15)	3.75 (3.00-4.73)	4.16 (3.26-5.37)	4.60 (3.51-6.10)	5.23 (3.84-7.20)	5.74 (4.08-8.19)
24-hr	2.52 (2.14-2.89)	3.03 (2.59-3.48)	3.71 (3.29-4.27)	4.28 (3.70-4.95)	5.06 (4.21-6.05)	5.67 (4.71-6.94)	6.30 (5.14-7.90)	6.97 (5.53-8.97)	7.90 (6.02-10.6)	8.84 (6.72-12.0)
2-day	3.35 (2.95-3.85)	4.14 (3.68-4.76)	5.16 (4.57-5.94)	5.98 (5.26-6.94)	7.08 (6.03-8.48)	7.93 (6.62-9.70)	8.78 (7.48-11.0)	9.66 (7.66-12.4)	10.9 (8.77-14.1)	11.8 (9.28-16.3)
3-day	3.93 (3.50-4.51)	4.93 (4.38-5.66)	6.19 (5.48-7.13)	7.20 (6.33-8.35)	8.53 (7.37-10.2)	9.54 (8.16-11.7)	10.5 (8.58-13.2)	11.8 (9.17-14.9)	12.9 (9.84-17.3)	14.0 (10.3-19.3)
4-day	4.36 (3.89-5.00)	5.51 (4.93-6.32)	6.95 (6.18-8.00)	8.09 (7.11-9.29)	9.58 (8.11-11.8)	10.7 (8.92-13.1)	11.8 (9.22-14.9)	12.9 (10.2-16.5)	14.4 (10.3-19.3)	15.5 (11.4-21.4)
7-day	5.39 (4.90-5.98)	6.59 (5.93-7.86)	8.69 (7.75-9.95)	10.1 (8.84-11.7)	11.9 (10.1-14.2)	13.2 (11.3-16.1)	14.5 (11.5-19.1)	15.8 (12.5-20.3)	17.4 (13.2-22.6)	18.7 (13.9-25.9)
10-day	5.77 (5.29-7.08)	7.39 (6.68-8.92)	9.92 (8.85-11.4)	11.5 (10.1-13.4)	13.3 (11.5-15.2)	15.0 (12.5-18.4)	16.5 (13.4-20.9)	17.9 (14.2-23.1)	19.7 (15.2-26.4)	21.0 (15.5-28.2)
20-day	8.23 (7.32-9.44)	10.5 (9.35-12.1)	13.3 (11.8-15.3)	15.4 (13.5-17.9)	18.0 (15.4-21.8)	19.9 (16.8-24.4)	21.7 (17.7-27.3)	23.5 (18.6-30.2)	25.7 (19.6-34.4)	27.3 (20.1-37.8)
30-day	9.94 (8.84-11.4)	12.7 (11.3-14.8)	16.0 (14.2-19.4)	18.5 (16.2-21.8)	21.8 (18.4-25.9)	23.8 (19.6-29.1)	25.9 (21.1-32.4)	27.9 (22.1-35.9)	30.4 (23.2-40.7)	32.2 (23.7-44.8)
45-day	12.1 (10.3-13.9)	15.4 (13.7-17.7)	19.3 (17.1-22.2)	22.2 (19.6-25.9)	25.9 (22.6-31.2)	28.4 (23.7-34.7)	30.8 (25.1-38.9)	33.1 (26.2-42.8)	36.0 (27.4-48.2)	38.0 (28.0-52.7)
60-day	14.4 (12.3-18.8)	18.2 (16.3-20.8)	22.7 (20.1-28.1)	26.0 (22.8-30.2)	30.2 (25.7-36.1)	33.0 (27.6-40.4)	35.7 (29.1-44.7)	38.3 (30.4-48.3)	41.5 (31.6-55.9)	43.8 (32.1-60.7)

† Precipitation frequency (PF) estimates in this table are based on frequency analysis of partial duration series (PDS). Numbers in parentheses are 90% estimates of lower and upper bounds of the 90% confidence interval. The probability that precipitation frequency estimates for a given duration and average recurrence interval will be greater than the upper bound or less than the lower bound is 5%. Estimates at upper bounds are not checked against available maximum precipitation (PMP) estimates and may be higher than currently valid PMP values. Please refer to NOAA Atlas 14 document for more information.

PF graphical

PDS-based depth-duration-frequency (DDF) curves
 Latitude: 38.6981° Longitude: -121.0092°





Attachment B – USGS Quad Map



Potential blue line stream, unmapped
The blue line stream connects to Green Spring Creek



Attachment C – Google Aerial View

3621 Foxmore Ln





Attachment D – Surface Water Buffer excerpt from the 2022 Construction Stormwater General Permit

II.G. Surface Water Buffer⁵

- II.G.1. Dischargers shall provide and maintain natural buffers and/or equivalent erosion and sediment controls when a water of the U.S. is located within 50 feet of the site's earth disturbances, unless infeasible.
- II.G.2. Dischargers shall comply with one of the following alternatives for any discharges to waters of the U.S. located within 50 feet of a site's earth disturbances:
- a. Provide and maintain a 50-foot undisturbed natural buffer from the edge of the disturbed area to the top of bank;
 - b. Provide and maintain an undisturbed natural buffer that is less than 50 feet and is supplemented by erosion and sediment controls that achieve, in combination, the sediment load reduction equivalent to a 50-foot undisturbed natural buffer. The equivalent sediment load may be calculated using RUSLE2 or another method approved by the Regional Water Board; or
 - c. Implement erosion and sediment controls to achieve the sediment load reduction equivalent to a 50-foot undisturbed natural buffer when infeasible to provide and maintain an undisturbed natural buffer of any size. The equivalent sediment load may be calculated using RUSLE2 or another method approved by the Regional Water Board.

II.H. Pesticide Application

Dischargers shall only apply pesticides that have been authorized for use through California Department of Pesticide Regulation. The application of pesticides shall follow manufacturer's guidance.

II.I. Demolition of Existing Structure

Dischargers shall prevent exposing demolition materials to precipitation. Demolition materials should be covered with an impermeable barrier such as, but not limited to, plastic sheeting prior to precipitation to prevent known contaminants from being mobilized. Dischargers unable to cover demolished material that were not previously investigated or found to be absent of applicable pollutants in reportable quantities shall sample for any non-visible pollutants that may be in stormwater

⁵ The surface water buffer requirements apply to work above the top-of-bank or high-water level of waters of the United States. Work within a channel or streambed (water body-dependent construction), Clean Water Act § 404 projects with a § 401 certification, and projects where no natural surface buffer exists (e.g., concrete channelization) are exempt from the requirements. All types of in-channel work may be regulated under § 401 (Clean Water Act - Regional Boards), § 404 (Clean Water Act - Army Corps of Engineers), or §1602 (California Fish and Game Code).

From: BOS-District I
Sent: Tuesday, September 24, 2024 6:56 AM
To: BOS-Clerk of the Board
Subject: FW: Opposition to the Bass Lake Apartments

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: CATHY AVALLONE <c.avallone@comcast.net>
Sent: Monday, September 23, 2024 7:32 PM
To: BOS-District I <bosone@edcgov.us>
Subject: Opposition to the Bass Lake Apartments

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

September 23, 2024

Re: Appeal for Tentative Parcel Map P24-0009

Dear Members of the Board of Supervisors,

I am writing to express my strong opposition to the approval of Tentative Parcel Map P24-0009, which was approved on August 21, 2024. This map represents a clear case of piecemeal development, a tactic used to divide projects in order to avoid proper environmental review. I urge the Board to overturn this decision and reject the parcel map due to its environmental and public safety risks, as well as its inconsistency with the county's General Plan.

The developer, Affirmed Housing Group, is attempting to bypass the California Environmental Quality Act (CEQA) by dividing the parcel into smaller lots. This maneuver, known as "piecemealing," is specifically designed to avoid the thorough environmental analysis that would be required for a larger project. By approving this map, the county is allowing the developer to sidestep critical protections

that ensure the environment is safeguarded, particularly when sensitive habitats like wetlands are involved.

The presence of wetlands and wildlife on the parcel should disqualify this project from any CEQA exemption. Future development under SB330 and AB2011 would destroy habitats for species such as the White-tailed Kite and the yellow-legged frog, which are protected under California law. The developer has acknowledged that this map is intended to isolate sensitive habitat, which is a thinly veiled attempt to circumvent environmental oversight. Courts have repeatedly ruled that developers cannot escape CEQA review through segmentation, and I urge the Board to uphold these legal precedents by rejecting this map.

Public safety is also a critical concern. The approval of this parcel split will facilitate future high-density development without the necessary infrastructure improvements to handle increased traffic. Green Valley Elementary School is located near the site, and without a traffic study or mitigation plan, the risks to students, parents, and staff will increase significantly. The area is already heavily impacted by traffic, and adding more residents without adequate planning will only make the situation worse. Additionally, the surrounding community is located in a high fire-risk zone, and any increase in population will strain evacuation routes and emergency services. These safety risks should not be overlooked.

Further, this map is inconsistent with the county's General Plan. The parcel in question is currently zoned for commercial use, which is intended to serve the surrounding residential community. Approving this map would allow the construction of high-density residential housing in an area that was meant to provide essential commercial services to local residents. This shift in land use would not only increase the demand for those services but also remove the opportunity to provide them in the future, harming the long-term development of the area.

Given these environmental, safety, and planning concerns, I respectfully request that the Board of Supervisors overturn the Zoning Administrator's approval of Tentative Parcel Map P24-0009. Allowing this project to move forward would set a harmful precedent for future developments in the county, encouraging developers to divide projects to avoid meaningful environmental review and community input. The risks to the environment and public safety, as well as the violation of the General Plan, are too significant to ignore.

I trust the Board will consider the broader implications of this decision and act in the best interests of the community and the environment by disapproving this parcel map.

Thank you for your time and consideration.

Respectfully,

Cathy Avallone
3478 Foxmore Lane
Rescue, CA 95672

From: BOS-District I
Sent: Tuesday, September 24, 2024 6:57 AM
To: BOS-Clerk of the Board
Subject: FW: Opposition to the Bass Lake Apartments
Attachments: Template 1 cathy.docx

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: false <newtone9@att.net>
Sent: Monday, September 23, 2024 8:52 PM
To: BOS-District I <bosone@edcgov.us>
Subject: Opposition to the Bass Lake Apartments

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Here is my letter to oppose the Proposed Apartments on Foxmoor.



Virus-free www.avg.com

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

September 23, 2024

Re: Appeal for Tentative Parcel Map P24-0009

Dear Members of the Board of Supervisors,

I am writing to appeal the approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. This map is a clear attempt at "piecemeal development" to bypass thorough environmental review under CEQA. Courts have repeatedly ruled against such practices, and I urge the Board to disapprove of this map.

The approval of this map would enable development that poses significant risks to the environment, including the destruction of wetlands and sensitive habitats, while also creating public safety hazards for the local community, especially near Green Valley Elementary School. Without a traffic study or mitigation measures, this area could face severe impacts from increased traffic and potential evacuation challenges in a high-fire-risk zone.

Furthermore, granting this parcel split would violate El Dorado County's General Plan, as it would replace crucial commercial zoning with high-density residential development, robbing the community of essential services.

I respectfully ask the Board to overturn the Zoning Administrator's decision and protect the community from the detrimental effects of this project.

Respectfully,

Debra Malcolm

From: BOS-District I
Sent: Tuesday, September 24, 2024 6:57 AM
To: BOS-Clerk of the Board
Subject: FW: Opposition to the Bass Lake Apartments

Cindy Munt

Assistant to Supervisor John Hidahl, District 1
Board of Supervisors, County of El Dorado
Phone: (530) 621-5650
[Link to Facebook page](#)
[Link to Nextdoor](#)
[Link to Supervisor Hidahl's webpage](#)



From: Jerry Avallone <jnajr@comcast.net>
Sent: Monday, September 23, 2024 9:02 PM
To: BOS-District I <bosone@edcgov.us>
Subject: Opposition to the Bass Lake Apartments

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

September 23, 2024

Re: Appeal for Tentative Parcel Map P24-0009

Dear Members of the Board of Supervisors,

I am writing to appeal the recent approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. I, along with others in the Bass Lake Apartments Opposition Alliance, have serious concerns regarding this decision and urge the Board to overturn the Zoning Administrator's approval.

The proposed map appears to facilitate "piecemeal development," a strategy often used to circumvent the environmental review process. By splitting the parcel, the developer is attempting to avoid the thorough environmental evaluation required under CEQA. Courts have consistently ruled against such tactics, and this project should be no exception. Approving this map would set a dangerous precedent for future developments in the county, encouraging developers to break up larger projects to dodge environmental regulations.

Moreover, the approval of this map raises significant environmental concerns. The area in question includes sensitive wetlands and habitats for species protected under California law. If the parcel split proceeds, it opens the door for future development under SB330 and AB2011, which would lead to the destruction of these critical environments without sufficient oversight. The developer's own admission that this map aims to "separate out any sensitive habitat" shows a clear intent to bypass environmental safeguards.

There are also serious public safety implications. Green Valley Elementary School and the surrounding neighborhood will face increased traffic without proper mitigation measures. With no traffic study required for future developments under SB330 and AB2011, the risks to schoolchildren, parents, and staff will grow significantly. Additionally, this area is prone to fire evacuation orders, and more development without infrastructure improvements would make evacuations even more dangerous.

Finally, approving this map would violate the intent of the El Dorado County General Plan. The area is currently zoned for commercial use, intended to serve the needs of the growing residential community. Approving high-density housing in this location would eliminate vital commercial space while increasing the demand for such services. This contradiction would harm the long-term development goals of the county and put unnecessary strain on local resources.

In light of these concerns, I respectfully ask the Board to reconsider and disapprove of Tentative Parcel Map P24-0009. The potential environmental destruction, public safety risks, and disregard for the county's planning principles are too great to allow this project to move forward unchecked.

Thank you for your attention to this important matter.

Sincerely,

Jerry Avallone
3478 Foxmore Lane
Rescue, CA 95672

From: Susan <susanstatti@gmail.com>
Sent: Monday, September 23, 2024 5:06 PM
To: BOS-Clerk of the Board
Subject: Appeal for Tentative Parcel Map P24-0009

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Dear Clerk of the Board,

I am writing to appeal the approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. This map is an attempt at "piecemeal development" to bypass thorough environmental review under CEQA. Courts have repeatedly ruled against such practices, and I urge the Board to disapprove of this map.

The approval of this map would enable development that poses significant risks to the environment, including the destruction of wetlands and sensitive habitats, while also creating public safety hazards for the local community, especially near Green Valley Elementary School. Without a traffic study or mitigation measures, this area could face severe impacts from increased traffic and potential evacuation challenges in a high-fire-risk zone.

Furthermore, granting this parcel split would violate El Dorado County's General Plan, as it would replace crucial commercial zoning with high-density residential development, robbing the community of essential services.

I respectfully ask that you vote to overturn the Zoning Administrator's decision and protect the community from the detrimental effects of this project.

Thank you,

Susan Statti
Rescue, CA
susanstatti@gmail.com
916-606-5366

From: Bill <bstatti@gmail.com>
Sent: Monday, September 23, 2024 5:09 PM
To: BOS-Clerk of the Board
Subject: Appeal for Tentative Parcel Map P24-0009

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Dear Board of Clerk,

I hope this message finds you well.

I am writing to oppose the approval of Tentative Parcel Map P24-0009, granted on August 21, 2024. This project exemplifies piecemeal development—a method used to avoid comprehensive environmental review by splitting larger projects into smaller parts. I respectfully urge the Board to overturn this decision due to the significant environmental, public safety, and planning concerns it raises, as well as its inconsistency with the county's General Plan.

The developer, Affirmed Housing Group, is attempting to bypass the California Environmental Quality Act (CEQA) by dividing the parcel into smaller lots, a clear case of "piecemealing" to avoid proper scrutiny. This decision enables the developer to bypass protections designed to safeguard sensitive habitats, including wetlands that are vital to the local ecosystem.

Given the presence of protected species such as the White-tailed Kite, the yellow-legged frog, and wetlands the project should not qualify for a CEQA exemption. Courts have repeatedly ruled against developers who try to evade environmental oversight through segmentation, and I urge the Board to follow these legal precedents by rejecting the map.

Public safety is also at risk. The approval of this parcel split will pave the way for high-density development without proper infrastructure to accommodate increased traffic. With Green Valley Elementary School nearby, the lack of a traffic study poses serious risks to students and the broader community. Additionally, this area is classified as a high fire-risk zone, and increasing population density without adequate evacuation routes and emergency services would endanger residents.

Furthermore, this development contradicts the county's General Plan. The parcel is zoned for commercial use to serve the surrounding residential community. Allowing high-density residential construction in this area would not only disrupt the intended land use but also diminish opportunities for future commercial services that local residents rely on.

For these reasons, I urge the Board to reconsider and overturn the approval of Tentative Parcel Map P24-0009. Moving forward with this project would set a harmful precedent for future developments by encouraging the use of loopholes to evade proper environmental review and community involvement.

Thank you for considering these critical concerns. I trust the Board will prioritize the long-term interests of the community and environment by rejecting this parcel map.

Bill Statti
Rescue, CA
bstatti@gmail.com

From: Bianca L. Dinkler
Sent: Tuesday, September 24, 2024 9:01 AM
To: BOS-Clerk of the Board
Subject: Fw: Bass Lake Apartment Proposal

Bianca Dinkler
Senior Planner

County of El Dorado
Planning and Building Department
2850 Fairlane Court, Building C
Placerville, CA 95667
Bianca.Dinkler@edcgov.us
(530) 621-5355 Main | (530) 621-5875 Direct



From: Cheri Prostler <cprostler@gmail.com>
Sent: Monday, September 23, 2024 7:05 PM
To: Bianca L. Dinkler <Bianca.Dinkler@edcgov.us>
Subject: Bass Lake Apartment Proposal

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Cheri Prostler
3174 Weymouth Way
Rescue, Ca 95672
cprostler@gmail.com
(530)677-5088

9/23/24

El Dorado County Board of Supervisors
330 Fair Lane Bldg A
Placerville, Ca 95667

Dear Honorable Supervisors,

I am writing to express my concerns regarding the proposed low-income apartment complex at the corner of Foxmore Lane and Bass Lake Road. While I fully recognize the importance of affordable housing and support efforts to address the housing needs in our community, I believe that this particular location is not a suitable choice for such a project.

First and foremost, the environmental impact of this project cannot be ignored. The proposed development site would invade natural spaces, including trees, water flow areas, wetlands, and habitats for local wildlife. Preserving these ecosystems is essential to maintaining the environmental balance and natural beauty that our community values.

In addition to the environmental concerns, the location of this complex raises significant safety and traffic issues. The proposed development is situated on a narrow street directly across from an elementary school. As a resident of Sierra Crossing, I can personally attest to the chaotic traffic conditions during school hours, with cars and pedestrians congesting the area several times a day. The influx of additional residents would only exacerbate these traffic problems, making it even more challenging for local residents to safely enter and exit our community. The current infrastructure simply does not support the increased demand that a large apartment complex would create.

Furthermore, there are no public transportation options in this area, nor are there nearby government or social assistance offices that would serve the needs of potential residents of a low-income housing project. The lack of nearby grocery stores and job opportunities further emphasizes the impracticality of this location for a development intended to support low-income families.

Another major concern is the impact on our homeowners' association (HOA). Our HOA maintains a walking trail behind our homes, which is a private amenity for our residents. However, we worry that the construction of a nearby apartment complex will attract non-residents to our trail, causing disruptions and placing additional strain on HOA resources.

In conclusion, while I support the need for more housing options in El Dorado County, this location is ill-suited for such a development. The environmental impact, traffic and safety concerns, lack of accessible services, and the strain on our community infrastructure all point to the conclusion that this project is not viable in its current proposed location. I urge the Board of Supervisors to deny this proposal and seek a more appropriate location for the development of affordable housing that better serves both future residents and the current community.

Thank you for your consideration of these concerns.

Sincerely,
Cheri Prostler
Sierra Crossing Community Resident

From: Wesly Tonks <watonks@gmail.com>
Sent: Tuesday, September 24, 2024 9:20 AM
To: BOS-District I; BOS-District II; BOS-District III; BOS-District IV; BOS-District V; BOS-Clerk of the Board
Subject: 9/24 Appeal Bass lake Family Apartments
Attachments: sf_ab2011.pdf; bla_appeal_ii.pdf

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Members of the Board of Supervisors,

Ahead of today's appeal hearing, I have prepared the attached letter which I will present to you this afternoon.

Please also see the attached AB2011 application form from the City and County of San Francisco which shows that, if a site contains wetlands, then it does not qualify for AB2011. Therefore, to remove wetlands from a site with a parcel map in preparation for an AB2011 application is directly equivalent to piecemealing. Many other local agencies across the state also use similar language in their application forms. Note that El Dorado County does not have an AB2011 form publicly available.

I recommend the board overturn this parcel map, or, at the very least, require CEQA for the parcel map, and instruct county staff to consider the whole project, as required by CEQA. **An even better solution for the community would be to work with the developer to find a site that IS suitable for AB2011 application, and move the project to that site.**

Thanks,
Wesly Tonks



HOUSING DEVELOPMENT STREAMLINED APPROVAL - 100% AFFORDABLE HOUSING PROJECTS APPLICATION

INFORMATIONAL AND SUPPLEMENTAL APPLICATION PACKET

For questions, you can call the Planning counter at 628.652.7300 or email pic@sfgov.org where planners are able to assist you.

Español: Si desea ayuda sobre cómo llenar esta solicitud en español, por favor llame al 628.652.7550. Tenga en cuenta que el Departamento de Planificación requerirá al menos un día hábil para responder.

中文: 如果您希望獲得使用中文填寫這份申請表的幫助，請致電628.652.7550。請注意，規劃部門需要至少一個工作日來回應。

Filipino: Kung gusto mo ng tulong sa pagkumpleto ng application na ito sa Filipino, paki tawagan ang 628.652.7550. Paki tandaan na mangangailangan ang Planning Department ng hindi kukulangin sa isang araw na pantrabaho para makasagot.

WHAT IS A HOUSING DEVELOPMENT STREAMLINED APPROVAL USING ASSEMBLY BILL 2011 (AB 2011)?

In response to California's housing crisis, the State Legislature has introduced numerous bills to fund, incentivize, and legalize new housing. On September 29, 2022, Governor Gavin Newsom signed into law Assembly Bill 2011 (AB 2011), the Affordable Housing and High Road Jobs Act of 2022. Generally, AB 2011 creates a ministerial approval process for multifamily housing developments on certain sites where office, retail or parking are principally permitted in exchange for certain amounts of on-site affordable housing and workforce commitments.

IS MY PROJECT ELIGIBLE FOR HOUSING DEVELOPMENT STREAMLINED APPROVAL USING AB 2011?

In order to be eligible for streamlining, the project must meet all of the development and eligibility criteria in Government Code 65912 et seq. Please review [Planning Director Bulletin 9](#) and Government Code 65912 et seq. for additional information. This section summarizes certain general requirements. In the event of any conflict between the provisions of the Government Code section 65912 et seq, and this AB 2011 application, the Government Code shall control.

This housing development streamlined approval application is for 100% affordable housing projects only. To qualify as a 100% Affordable Housing Project, 100% of the units, excluding managers units, must be dedicated to low income households (80% AMI per HUD income levels) and deed restricted for at least a period of 55 years for rental projects and 45 years for ownership projects.

100% Affordable Project must propose at least. AB 2011 100% Affordable Housing Projects must:

- propose at least five dwelling units and be considered a Housing Development Project as defined in Government Code Section 65912.101(e);
- meet minimum density requirements of 30 units/acre; and
- meet all other objective standards within the Planning Code, and agree to minimum labor/workforce standards.

WHAT IS THE PROCESS FOR HOUSING DEVELOPMENT STREAMLINED APPROVAL USING AB 2011?

To apply for AB 2011 approval, please submit an AB 2011 supplemental application, and a site or building permit to the Department of Building Inspection (DBI), under the same procedure as site and building permit submittals. Please indicate on the building or site permit's "description of work" that the permit is part of an AB 2011 application.

The Planning Department will determine if the development submitted pursuant to this article is in conflict with any of the objective planning standards within 60 days of submittal if the development proposal contains 150 or fewer housing units and within 90 days of submittal if the development proposal contains more than 150 housing units.

The Planning Department will conduct design review of the development within 90 days of submittal if the development proposal contains 150 or fewer housing units and within 180 days of submittal if the development proposal contains more than 150 housing units.

Certain requirements, including workforce requirements, replacement dwelling unit requirements, and commercial relocation will be included as conditions on the site permit and must be recorded in a Notice of Special Restrictions.



San Francisco Planning

AFFORDABLE HOUSING AND HIGH ROADS JOB ACT APPROVAL - 100% AFFORDABLE HOUSING PROJECTS (AB 2011)

SUPPLEMENTAL APPLICATION

Property Information

Existing Project Address(s):

Existing Block/Lot(s):

Proposed Project Address(s):

Proposed Block/Lot(s):

Property Owner's Information

Name:

Address:

Email Address:

Telephone:

Applicant Information

Same as above

Name:

Company/Organization:

Address:

Email Address:

Telephone:

Please Select Billing Contact:

Owner

Applicant

Other (see below for details)

Name: _____ Email: _____ Phone: _____

Project Description

Please provide a narrative project description that summarizes the project.

SB-1214 Authorization: [Senate Bill 1214](#) allows applications to limit the plans available to the public. You can find more information on our [website](#).

- Yes, all plans may be shared publicly.
- No, floor plans may not be shared publicly. A reduced plan set with only a massing diagram and site plan has been provided with this submittal for public distribution.

100% AFFORDABLE HOUSING PROJECT ELIGIBILITY CRITERIA SUPPLEMENTAL

(Pursuant to Govt. Code Section 65912.101-105 and 110-114)

ELIGIBILITY OF PROPERTY		YES	NO
1	<p>Is the development site a legal parcel in a zone where either office, retail, or parking are a principally permitted use?</p> <p>For purposes of an AB 2011 application, principally permitted means “a use that may occupy more than one-third of the square footage of designated use on the site and does not require a conditional use permit” (see Gov’t Code §65912.101(n).)</p> <p>Zoning District:</p>	<input type="checkbox"/>	<input type="checkbox"/>
2	<p>Is the development site a property that contains prime farmland, wetlands, a high fire hazard severity zone, a delineated earthquake fault zone, a flood plain, a floodway, a community conservation plan area, a habitat for protected species, or that is under a conservation easement? (Gov’t Code 65912.111(e).)</p>	<input type="checkbox"/>	<input type="checkbox"/>
3	<p>Is the development site a hazardous waste site as defined under (Gov’t Code §§ 65912.111(e) 65913.4(a)(6)(e).)</p> <p>If yes, you must secure a letter from the State Department of Public Health, State Water Resources Control Board, or the Department of Toxic Substance Control stating that the site is suitable for residential uses prior to submitting an AB 2011 application. Applications for projects on hazardous waste sites without a letter from the appropriate government agency stating that the site is suitable for residential uses will not be accepted as complete.</p>	<input type="checkbox"/>	<input type="checkbox"/>
4	<p>Will any of the housing on the development site be located less than 500 feet from a freeway, defined in California Vehicle Code section 332, or less than 3200 feet from a facility that actively extracts or refines oil or natural gas?</p>	<input type="checkbox"/>	<input type="checkbox"/>
5	<p>Is the development site a lot where more than 1/3 of the square footage on the site is “dedicated to industrial uses”? For a definition of “industrial uses” please see Planning Director Bulletin 9.</p> <p>Is the development adjacent to a lot where more than 1/3 of the square footage on the site is “dedicated to industrial uses”?</p> <p>Is the development separated by a street or highway from any lot where more than 1/3 of the square footage on the site is “dedicated to industrial uses”?</p> <p>Please complete the attached AB 2011 Industrial Uses Affidavit.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
6	<p>Has the project completed a Phase 1 Environmental Site Assessment?</p> <p>The project sponsor must complete and submit a Phase 1 Environmental Site Assessment at application submittal. If hazardous materials are found, further investigation and/or remediation may be required. Remediation may also be required if there is potential for exposure to significant hazards from off-site source(s) in the surrounding area. If hazardous materials are found, the project sponsor must coordinate with the San Francisco Department of Public Health to conduct additional investigation and, if required, soil and/or groundwater remediation. This would likely be done as part of compliance with the Maher ordinance (San Francisco Health Code Chapter 22A) and would be conditioned as part of the AB 2011 approval.</p>	<input type="checkbox"/>	<input type="checkbox"/>
7	<p>Tribal Notification on Vacant Sites. Is the development site vacant?</p> <p>If the site is vacant, the Department will conduct tribal consultation as described by Section 21080.3.1 of the Public Resources Code to confirm that the site does not contain tribal cultural resources. (Gov’t Code § 65912.111(h).)</p>	<input type="checkbox"/>	<input type="checkbox"/>

100% AFFORDABLE HOUSING PROJECT ELIGIBILITY CRITERIA SUPPLEMENTAL

(Pursuant to Govt. Code Section 65912.101-105 and 110-114)

SUBMITTAL REQUIREMENTS

Verify submission of the following items with this application:

- Industrial Uses Affidavit
- Phase 1 Environmental Assessment
- Prevailing Wage and Apprenticeship Standards Affidavit
- Letter from State Department of Public Health, Water Resources Board or Department of Toxic Substance Control (if located on a site with hazardous waste)

INDUSTRIAL USES AFFIDAVIT

List the uses on the subject lot and surrounding lots. If you are unsure how to classify a business as a use, please consult [Planning Code Section 102](#) or contact pic@sfgov.org.

If there is an industrial use in the subject or adjacent lots, complete the table below.

Under penalty of perjury the following declarations are made:

- a) The existing uses on the development site are _____.
- b) The existing use on the adjacent lots to the development site are _____.
- c) The existing uses on the lots separated by a street or highway from the development site are _____.

	Subject Lot	Lot North of Subject Property	Lot South of Subject Property	Lot East of Subject Property	Lot West of Subject Property
Block / Lot Number					
Total Building Sqft					
Use #1 Sqft					
Use #2 Sqft					

Signature

Name (Printed)

Date

Relationship to Project
(i.e. Owner, Architect, etc.)

Phone

Email

*[AB2011 legislation](#) with the specific criteria for tenant relocation assistance.



AFFIDAVIT FOR PREVAILING WAGE AND APPRENTICESHIP STANDARDS FOR AB 2011 PROJECTS (CA GOT. CODE SEC. 659 12.100-65912.140)

Project Sponsor's Information

Name: _____

Address: _____

Email Address: _____

Telephone: _____

Property Information and Related Applications

Project Address: _____

Block / Lot (s): _____

Building Permit Application No(s): _____

Planning Department Case No(s): _____

Planning Commission Motion No(s) (if applicable): _____

Estimated Residential Units: _____ Estimated SQFT Space (per land use): _____

Estimated Height / Floors: _____ Estimated Construction Cost: _____

Anticipated Start Date: _____

PREVAILING WAGE AND APPRENTICESHIP STANDARDS FOR AB 2011 PROJECTS

This Project has applied for streamlined ministerial approval process pursuant to CA Government Code Section 65912.120. The Developer affirms with signature to comply with the following requirements:

1. All construction workers employed in the execution of the development will be paid at least the general prevailing rate of per diem wages for the types of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.
2. All contracts will include language requiring compliance for all covered work with requirements to submit, maintain, and verify payroll records via the City's certified payroll reporting system.
3. All contracts will include language acknowledging the Office of Labor Standards Enforcement as the enforcement entity of these terms and requiring full cooperation with the Office of Labor Standards Enforcement in any potential investigations.

DECLARATION OF SPONSOR OF PRINCIPAL PROJECT

PRINT NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

EMAIL

PHONE

I hereby declare that the information provided herein is accurate to the best of my knowledge.

SIGNATURE OF AUTHORIZED REPRESENTATIVE

DATE

For Planning Department Staff Only: Please email an electronic copy of the completed affidavit for Prevailing Wage and Apprenticeship Standards to OLSE's Prevailing Wage Team at prevailingwage@sfgov.org.

Office of Labor Standards Enforcement
Address: 1 Dr. Carlton B. Goodlette Place, Room 430, San Francisco, CA 94102
Phone: 415.554.6573

APPLICANT'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

- a) The undersigned is the owner or authorized agent of the owner of this property.
- b) The information presented is true and correct to the best of my knowledge.
- c) Other information or applications may be required.
- d) I hereby authorize City and County of San Francisco Planning staff to conduct a site visit of this property as part of the City's review of this application, making all portions of the interior and exterior accessible through completion of construction and in response to the monitoring of any condition of approval.
- e) I attest that personally identifiable information (PII) - i.e. social security numbers, driver's license numbers, bank accounts - have not been provided as part of this application. Furthermore, where supplemental information is required by this application, PII has been redacted prior to submittal to the Planning Department. I understand that any information provided to the Planning Department becomes part of the public record and can be made available to the public for review and/or posted to Department websites.

Signature

Name (Printed)

Date

Relationship to Project
(i.e. Owner, Architect, etc.)

Phone

Email

For Department Use Only

Application received by Planning Department:

By: _____

Date: _____

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

September 24th, 2024

Re: Appeal for Tentative Parcel Map P24-0009

Dear Members of the Board of Supervisors,

The decision you make today will set a precedent which will resound throughout El Dorado County and the State of California. The following question stands before you - shall a developer be allowed to split their land in such a way as to remove environmentally sensitive areas, thus allowing them to qualify for a streamlined ministerial development on that land? Make no mistake, developers and land use consultants across the state are watching closely. Should you vote in favor of this parcel map, more dubious parcel maps and AB2011 applications will come.

In this situation, Affirmed Housing seeks the approval of a parcel map which will remove wetlands from their site, so that they may later qualify for AB2011. They claim the parcel map is not required in order to qualify for AB2011, and that this parcel map would not avoid any otherwise required environmental review. They also claim that the appeal before you has no basis and seeks to misuse the parcel map approval process, while also attempting to modify the AB2011 approval process. Lastly, in an effort to intimidate, they claim that it would be a violation of AB2011 to overturn this parcel map, and that since this map is "associated" with an AB2011 project, it would be exempt from CEQA no matter the circumstance. Their recent letter to the board fails to provide evidence supporting these claims, and is simply an attempt to deceive the county.

Applicant falsely claims that the parcel map is not required to qualify for AB2011, and would not avoid any otherwise required environmental review

The majority of the applicant's argument relies on a misinterpretation of California Gov. Code 65913.4(a)(6)(C), which outlines requirements for AB2011 projects. Their claim is that "the site is not wetlands", and is thus in accordance with AB2011 requirements, even though their site is, partially, wetlands. No evidence is provided by the applicant to support their interpretation of the law. An examination of AB2011 application forms across the state reveals that the applicant's interpretation is too narrow. The City and County of San Francisco's AB2011 application form reads "Is the development site a property that contains ... wetlands?" (emphasis added) Other local agencies across the state use similar interpretations¹. Furthermore, no interpretations of this law exist which support the applicant's claim.

¹ See City of Burbank AB2011 Application, City of Oakland AB2011 Application, City of Hayward AB2011 Application, City of Wildomar SB330 Application, City of San Diego AB2011 Checklist, City of Gilroy AB2011 Checklist, City of Agoura Hills SB330 Application

² The County of El Dorado has no publicly available AB2011 application

Since the site, as it stands without the parcel map, would not qualify for the streamlined ministerial process under AB2011, there is indeed merit to the claim I have made that this parcel map is being used in order to avoid environmental review. This fact is a plain violation of CEQA and decades of case law.³⁴⁵⁶

If there is still any doubt, please examine the actions taken by the applicant - if they claim the parcel map is not required, then why waste their valuable resources drafting and applying for a subdivision? The answer is that the presence of wetlands on their parcel disqualifies them from ministerial development under AB2011, and this parcel map is in fact a requirement to qualify. In their initial parcel map submission, the applicant proposed segmenting out just one portion of wetlands on the site, and chose to hide the fact that another cluster of wetlands existed on the site. After comment from the public, they revealed additional (previously undisclosed) environmental reports did indeed find smaller wetlands outside of the originally proposed remainder parcel. It was at this time that an updated parcel map was submitted, which extended the boundary of the remainder parcel to include the "newly discovered" smaller wetlands. This required the drafting of not one, but two separate parcel maps - a commitment of valuable resources which does not align with their claim that this parcel map is not required to qualify for AB2011. These actions in fact align more closely with the intent to avoid environmental regulation, and not "waste" valuable resources there.

Of special interest is that the County of El Dorado does not have a publicly available AB2011 application form. A wise developer would notice this, and use the County's lack of experience in this domain to their benefit. Let me ask you this - given the AB2011 application form provided by The City and County of San Francisco - do you think the developer would be attempting this development there? (No) The applicant seeks to sow the seeds of confusion with multiple letters stating the intent to apply for a streamlined ministerial development under AB2011 in a county which has no experience handling such applications.

Applicant claims it would be a violation of AB2011 to overturn this parcel map

An aspect of the confusion they aim to create is their claim that it would be a violation of AB2011 to overturn this map. There is the intent, expressed in writing by the applicant, to file an AB2011 application only after this parcel map has been processed. To this point, the applicant submitted their own version of an AB2011 checklist to the county, which claims (incorrectly) that the site qualifies for AB2011 despite the presence of wetlands. Any claim that disapproval of this parcel map is a violation of AB2011 is incorrect, and is simply intended to promote confusion and concern within the County, pressuring officials to not question the legitimacy of the project.

³ Laurel Heights Improvement Assn. v. Regents of the University of California (1988) - local agencies must evaluate environmental impacts of reasonably foreseeable future projects

⁴ San Joaquin Raptor Rescue Center v. County of Merced (2007) - even if a minor subdivision is exempt from CEQA, if a future development could have environmental impact, CEQA is triggered for the entire project, including the subdivision.

⁵ Communities for a Better Environment v. South Coast Air Quality Management District (2010) - even if a part of a project has little or no impact on the environment, it must still be considered in environmental analysis

⁶ Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora (2007) - CEQA applies to a "zero" impact portion if other parts of the project have a "non-zero" impact.

Applicant asks you to ignore the rest of the project

The most concerning aspect of the applicant's letter is their specific language which aims to isolate the parcel map from the rest of the project. Their wish is for the "whole project" to be ignored, so that they may be granted an approval for their future AB2011 project. This is a direct violation of CEQA Guidelines Section 15378(a), which clarifies that "'Project' means the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately", and a direct violation of CEQA Guidelines Section 15003(h), which states "'CEQA is intended to be interpreted in such a manner as to afford the fullest possible protection to the environment". These CEQA guidelines are ignored by County Staff, who erroneously find that this parcel map should be exempt from CEQA. They fail to see that the whole project will result in cumulative environmental damage to wetlands, woodlands, and potential habitat for protected and endangered species. They also fail to identify piecemealing as the unusual circumstance which overrides a CEQA exemption for Minor Land Divisions (CEQA 15300.2). In making their recommendations, County Staff provide no evidence to support their argument that piecemealing is not occurring, and provide no evidence to support their claim that this parcel map will not lead to future environmental damage. Why is County Staff failing to interpret CEQA in such a way as to afford the fullest possible protection of the environment?

County Staff seems to be hiding behind the fact that a future project, if approved, would be ministerial. They fail to realize that this parcel map is a requirement in order for that ministerial approval to be granted, and further fail to realize that the parcel map is an attempt to piecemeal a project so as to avoid environmental regulation.

These actions of County Staff, if approved, will set precedent for future developments across El Dorado County and the State of California. If approved, this map will enable developers to piecemeal their way around any environmentally sensitive aspect of any commercial property so as to qualify for AB 2011. Are there commercial properties adjacent to Lake Tahoe? If so, developers, under this precedent, will be allowed to develop on those sites with zero concern for the environment. The Board is asked today, to deny the parcel map, on the grounds that its sole purpose is to enable the avoidance of environmental regulation for the applicant's intended project. Do not ignore the rest of the project, as the County Staff and Applicant are both asking you to do. Do not set this dangerous precedent.

Respectfully,

Wesly Tonks

3621 Foxmore Ln
Rescue, CA 95672

