Charlene Tim <charlene.tim@edcgov.us

Fwd: Dollar General Georgetown--Septic System Issues

Rich Stewart <rich.stewart@edcgov.us>

Fri, Jan 8, 2016 at 10:44 PM

To: Roger Trout <roger.trout@edcgov.us> Cc: Charlene Tim <charlene.tim@edcgov.us>, Gary Miller <gary.miller@edcgov.us>, Tom Heflin <tom.heflin@edcgov.us>, Dave Pratt <dave.pratt@edcgov.us>, Brian Shinault <brian.shinault@edcgov.us>, David Livingston <david.livingston@edcgov.us>

Please see Cheryl's note and attachments. I believe it should be part of the public comments as she indicated to share it as deemed necessary.

Rich Stewart

------ Forwarded message ------From: Cheryl <Cheryl.FMR@comcast.net> Date: Fri, Jan 8, 2016 at 3:11 PM Subject: Dollar General Georgetown--Septic System Issues To: rich.stewart@edcgov.us

Commissioner Stewart--

I have concerns about the adequacy of the <u>septic system</u> proposed for the <u>Dollar General store in Georgetown</u>. (I do not live in Georgetown; my primary interest in this project relates to the adequacy of the septic system being proposed, and El Dorado County's possible approval of a project that may not have adequate wastewater disposal capabilities.)

I recently sent an inquiry to the Central Valley Regional Water Quality Control Board (CVRWQCB) and asked them for an assessment of the system—a determination of the appropriateness of the scale (and location) of the system for the proposed project. I've attached the file I sent to the CVRWQCB that details my concerns (File 1).

The CVRWQCB did not get back to me directly; they forwarded my inquiry to El Dorado County Environmental Management Division Director Greg Stanton, who sent an email to me indicating the septic system "...is a proposal in concept and has not yet been approved for installation by this division." (File 2).

Because EDC Environmental Management has not approved the "recommended" septic system, (and because the system seems *inadequate and in violation of setback requirements*)—I'm wondering why the project is going before the Planning Commission at this time. (As you likely recall, this project will be heard before the Planning Commission on January 14th.)

While I have sent this correspondence to you only (as Chairman of the Planning Commission), please feel free to distribute it to anyone you feel may be interested/concerned.

Cheryl Langley

1/11/2016

Edcgov.us Mail - Fwd: Dollar General Georgetown--Septic System Issues

Shingle Springs Resident

Cheryl.FMR@comcast.net

2 attachments

CVRWQCB_Attachment.pdf

Stanton_Email.pdf

For this particular septic system:

- The proposed commercial structure will be a **Dollar General Store of 9,100 sg. ft**. (It will have one women's and one men's public restroom, each restroom will have one toilet and one lavatory; the store will also have one drinking fountain, and one mop sink.)
- The septic system is designed for an estimated inflow of 300 gal/day of wastewater. (Because a single-family dwelling unit is expected to generate 250 gal/day of wastewater—according to the SWRCB OWTS Policy document—300 gal/day seems a surprisingly small figure.)
- Percolation tests revealed a percolation rate of 32, 143, 165, and 231 min/inch (mpi) for four

 (4) borings; it was noted "the near surface soils have poor absorption characteristics, with equivalent percolation rates of approximately 140 to 230 mins/inch." It should be noted the percolation rate of 32 mpi was from a boring site that appears to be in a location planned for the driveway/parking lot—but was described as "...an area available for dispersal system expansion, if required." (See P4 below and on following page.)

Test No.	Depth Below Grade (feet)	Percolation Rate * (min/inch)	Absorption Capacity (gallon/square foot/day) (Factor of Szfety=1)	Soil Type
P-1	2.3	143	1.3	Clay Loam
P-2	3.1	231	0.8	Ciay Loam / Ciay
P-3	3.5	165	1.1	Gravelly Clay Loam
P-4	2.8	32	5.8	Loam/Loamy Sand

Continued on next page...

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The following describes the paved driveway / parking areas more clearly; **P4** seems to be in the paved (driveway) area.



- It was noted, "The percolation rates will deteriorate over time due to the soil conditions..."
- The scope of the engineering firm's services "...did not include a groundwater study..." (EAS Professionals, South Carolina; subcontracted to Salem Engineering Group, Inc., Fresno.)
- There was on-site evidence of "seasonal saturation at an approximate depth exceeding 48 inches" in the soil profile pit.

- In addition, "Field indications of a seasonal water table as close as 48 inches from the native surface were also observed."
- The proposed development will cover **three parcels**; the environmental consultant (Costella Environmental Consulting, Nevada City) indicated *"the mid-parcel appears to have several small "patches" of isolated <u>wetland</u> areas," "...totaling less than 0.1 acres." This wetland area is populated by <i>"a few mature willow trees"* and blackberry thickets.
- There are "...two small wetlands totaling 0.05 acres adjacent to a 0.01 acre on-site portion of a seasonal drainage that is approximately 2 feet wide and 107 feet in length..." "The project proposes to fill the two small wetlands."
- Seasonal drainage and the storm water drainage from the property collect into a storm system that conveys "...into Empire Creek, which eventually flows into the American River..."

Also, El Dorado County applies only a 50 foot septic system setback from "ephemeral (seasonal) stream/ swale" (see El Dorado County Septic System Minimum Setback Requirements at: https://www.edcgov.us/Government/EMD/EnvironmentalHealth/Septic System Minimum Setback Re guirements.aspx); the SWRCB OWTS indicates 100 feet from springs and flowing surface water, and 200 foot setback from wetlands is appropriate (under Tier 1 standards—OWTS Policy document, page 21; policies 7.5.4 and 7.5.5). (Not only does this SWRCB setback appear to be violated, the project will be filling wetland to implement the project.) According to the project description (in the Mitigated Negative Declaration), implementation of the project will require the following: a "Finding of consistency with General Plan Policy 7.3.3.4 to allow a reduction of the wetland setback from 50 feet to no setback with construction and structures within the required setback to allow the fill of an approimately 0.05 acres wetland..."

The septic system proposal includes:

- An "advanced treatment system," but it is unclear (to the public, at least) if this system meets the test of adequacy. (<u>Recommended system</u>: Hoot Systems model H-600-760 aerobic treatment system; an effluent adsorption rate of 0.2 gal/ft²/day.)
- The system's subsurface drip system will disperse septic tank effluent onto three dispersal zones; one of which is an <u>engineered fill slope</u> at the side of the project; "no testing of the percolation response for this material has been conducted."

(**NOTE:** according to El Dorado County "Septic System Minimum Setback Requirements," "<u>leach lines</u> <u>shall not be placed in fill material</u>," and yet this system proposal is for drip system placement in a fill slope.)

The excerpts (quotes) in this email file came from document **<u>11. G - Staff Report</u>** (Mitigated Negative Declaration) which can be accessed in the "**Attachments**" section at the El Dorado County Web site: <u>https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search=</u> om Greg Stanton < greg.stanton@edcgov.us>

ject Fwd: Tier 2 OWTS for El Dorado County

To Cheryl Langley

ි c Rapport, Eric@Waterboards <Eric.Rapport@waterboards.ca.gov>ි, OBrien, Timothy@Waterboards.cs.Smith, Bryan@Waterboards <Bryan.Smith@waterboards.ca.gov>ි, Busby, Robert@Waterboards <Robert.Busby@waterboards.ca.gov>ි, LHeureux, Robert@Waterboards <Robert.LHeureux@waterboards.ca.gov>ි, Fred E Sanford ි, Barbara Houghton <barbara.houghton@edcgov.us>

Dear Ms. Langley;

Thank you for your interest and input regarding the development of El Dorado County's Local Agency Management Plan (LAMP). I invite you to contact Fred Sanford, Supervising Environmental Health Specialist and project lead over the LAMP, if you have any questions or concerns. Fred can be reached at 530-621-7614, or by email at <u>fred.sanford@edcgov.u</u>s.

It has also come to my attention that you have some concerns regarding the proposed Dollar Store in Georgetown related to onsite sewage disposal. In brief, the engineering firm for the project, Salem Engineering Group, Inc., has followed all of the county's procedures for onsite sewage disposal design and site evaluation, including test trench (witnessed by county staff) and percolation tests. After evaluating the information gained from the site evaluation a determination was made that a standard septic system could not be utilized for this project. Salem Engineering discussed alternatives with Fred Sanford, who advised that the onsite wastewater treatment system for the subject project must include an "advanced treatment system" to reduce the BOD, suspended solids and preferably the nitrogen content of the treated wastewater effluent before discharge to a subsurface dispersal system. Advanced treatment system is a general term for any wastewater treatment system that is different from the conventional model and typically incorporates treatment units that include media filters and aerobic systems. At the present time this is a proposal in concept and has not yet been approved for installation by this division. Please feel free to give Fred a call if you have any questions regarding the proposed Dollar Store project relevant to onsite sewage disposal.

Respectfully, Greg Stanton, REHS Director

County of El Dorado

Community Development Agency Environmental Management Division 2850 Fairlane Court Placerville, CA 95667 (530) 621-6658 greg.stanton@edcgov.us

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