SimonCRE Abbie, LLC 5111 N. Scottsdale Rd., Suite 200 Scottsdale, AZ 85250

15 FEB 22 AM 9: 04

RECEIVED

PC 2/25/16 #5 30 PS SIMON CRE

February 4, 2016

El Dorado County Planning Commissioners 2850 Fairlane Court Placerville, CA 95667

RE: Georgetown, CA – 01-14-16 Dollar General Project Appeal Hearing Continuation Response/Action Letter Addendum APN's: 0613620110, 0613620210, and 0613620410

Dear El Dorado County Planning Commissioners:

A month ago today, I wrote the attached letter to the Commissioners to address the items brought up at the hearing back on December 10^{th} , 2015. This letter I'm writing today is to amend the previous letter and discuss our follow up actions per the concerns brought forth at the last hearing on January 14^{th} , 2016.

In the time between the first and second hearings, as discussed in the first letter, we went above and beyond to address the concerns of the commissioners. We once again reached out to the neighbors, commissioners, and county staff to make sure that all items were reconsidered and, if not addressed, further reviewed to make sure all options had been considered.

Unfortunately, due to inclement weather the day of the first hearing and then following the hearing, a misunderstanding surrounding the legality of contact between the appellant and members of the Commission, we were unable to utilize the expertise of Commissioner Shinault, in the field of Architecture. Without being afforded the luxury of his direction, we altered the elevations of the building as best as we could to meet the requests of the Commissioners that were in attendance, added the requested crosswalk across Orleans St. to the site plan and further reviewed the location of the building on the site, ultimately coming to the same conclusion of the infeasibility of reorienting the building.

Since that time, the second hearing occurred on January 14th, 2016, with a similar outcome to the first. Several additional concerns were brought up and discussed including the look of the building elevations, as Commissioner Shinault was present and able to give his feedback, and concerns about the septic system that were brought forth by Cheryl Langley, a community member from a neighboring area. Additionally, County Staff requested to revise the conditions of approval to formally add the crosswalk on Orleans St. that we had already added to the site plan.

Ms. Langley's comments were discussed at length and then later, County Environmental Health Staff engineer, Fred Sanford, who approved the supplemental septic system, discussed the



system and the County and State regulations that govern septic system approval and installation. His testimony seemed to put all the concerns to rest and explained in detail how the system worked compared to a traditional system. We have also gotten the designing engineer to formally respond to the comments and that letter is included and has been formally submitted to the county to be included in the public record.

To further address the new concerns from the Commissioners, we have revised the elevations of the building for a third time to address Commissioner Shinault's direction of making the elevation facing main street look more like multiple storefronts. Below is an illustration showing the revisions. Additionally, we have resent the elevations to the 3rd party historical architect to make sure that we are staying within the guidelines of the Historic District.



In conclusion, we would like to thank the Commissioners for their input and willingness to work with us to come to a mutually beneficial project solution that will benefit both us as the developer and the residents. To the best of our ability, we have gone back to the drawing board to help make this a better project not only today but also for generations to come. We know that this store will be an asset to the community and we want to show how developers, neighbors, and approving authorities can work together to create a great project for all.



Please feel free to contact us for any further clarification and thank you for your consideration.

Respectfully,

Dan Biswas

Vice President of Development

SimonCRE 480.745.2460

dan.biswas@simoncre.com

cc: Rob Peters and the El Dorado County Planning Department Staff





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 <bri>brian.shinault@edcgov.us>, 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

Shingle Springs Resident

Cheryl.FMR@comcast.net

2 attachments

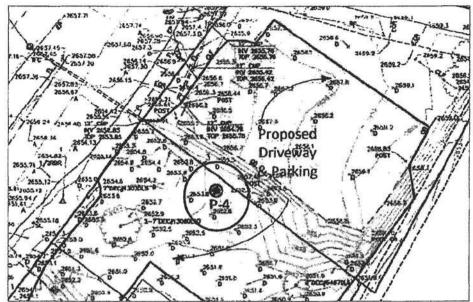
- CVRWQCB_Attachment.pdf 325K
- Stanton_Email.pdf 29K

For this particular septic system:

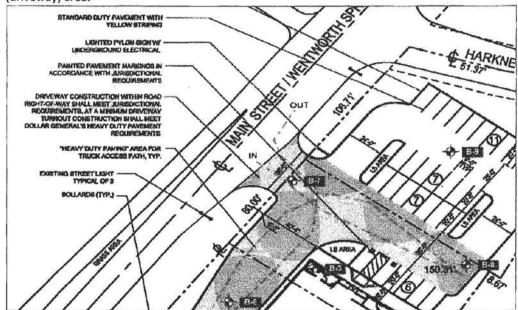
- The proposed commercial structure will be a <u>Dollar General Store of 9,100 sg. ft</u>. (It will have one women's and one men's public restroom, each restroom will have one toilet and one lavatory; the store will also have one drinking fountain, and one mop sink.)
- The septic system is designed for 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 Selety=1)	Soil Type
P-1	2.3	143	1.3	Clay Loam
P-2	3.1	231	0.8	Clay Loam / Clay
P-3	3.5	165	1.1	Gravelly Clay Loam
P-4	2.8	32	5.8	Loam/Loamy Sand

Continued on next page...



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 wetland areas," "...totaling less than 0.1 acres." This wetland area is populated by "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 Requirements.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 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 11. G - Staff Report (Mitigated Negative Declaration) which can be accessed in the "Attachments" section at the El Dorado County Web site: <a href="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legistar.com/LegislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&Options=&Search="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&OptionSearch="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&OptionSearch="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&OptionSearch="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&OptionSearch="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7CED640&OptionSearch="https://eldorado.legislationDetail.aspx?ID=2538205&GUID=93082C60-68C2-4211-8FA0-981FB7

To Cheryl Langley

Cc Rapport, Eric@Waterboards < Eric.Rapport@waterboards.ca.gov>①, OBrien, Timothy@Waterboards.c, Smith, Bryan@Waterboards < Bryan.Smith@waterboards.ca.gov>①, Busby, Robert@Waterboards < Robert.LHeureux@waterboards.ca.gov> ②, Fred E Sanford ②,

Barbara Houghton < barbara.houghton@edcgov.us> ②

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 fred.sanford@edcgov.us.

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



202 Val Dervin Pkwy Suite 300 Stockton, CA 95206 (209) 931-2226 Office (209) 931-2227 Fax

February 4, 2016

Scottsdale, AZ 85250

SALEM Project No. 4-214-0831 EAS Project No. EAS-14-406

Mr. Dan Biswas
SimonCRE
5111 N. Scottsdale Road, Suite 200

(480) 745-1956: Phone

Dan.Biswas@SimonCRE.com: Email

SUBJECT: EDC FILE #15-1409

RESPONSE TO PUBLIC COMMENTS

JANUARY 14, 2016 EDC PLANNING COMMISSION MEETING

PROPOSED DOLLAR GENERAL MARKET STORE SEC MAIN STREET & HARKNESS STREET

GEORGETOWN, CALIFORNIA

Dear Mr. Biswas:

At your request, SALEM Engineering Group, Inc. (SALEM) is pleased to submit the following response to public comments regarding the On-Site Wastewater Treatment System (OWTS) system currently proposed to be constructed at the subject site. SALEM previously prepared and submitted a March 3, 2015 Revised On-Site Wastewater Treatment System (OWTS) Feasibility Study under a Subcontracted Engineering Services agreement with EAS Professionals. We understand that selected public comments regarding that report were submitted to El Dorado County (EDC) on January 11, 2016, and were reiterated in person during the January 14, 2016 EDC Planning Commission meeting.

The responses below are presented in the general order of the comments provided. The comments have been paraphrased, but we believe the comment subject remains clear.

Comment: The volume of the septic system inflow appears low.

Response: SALEM based the given value (300 gallons per day) on water usage for same-configuration Dollar General stores in Northern California. This is often preferable to using wastewater flow volume assumptions based on the number and type of plumbing fixtures, as the estimate used is based on actual, measured flows under conditions similar to those anticipated once built. SALEM has used this method during previous commercial septic system designs, as many other counties in California (including El Dorado County) allow [and often prefer] same-configuration store water usage if available.

Comment: The percolation test results ranged from 32 to 231 minutes per inch (mpi), and the State Water Resources Control Board (SWRCB) 2012 OWTS policy— Tier 1 authority — does not allow rates slower than 120 mpi.

Response: El Dorado County has not yet submitted a Tier 2 Local Agency Management Program to the SWRCB for approval, but plans to within the next few months. As such, EDC is currently allowed to continue as the jurisdictional agency for OWTS and may apply its own Environmental Health Department OWTS guidelines. These guidelines, as codified in the current EDC Private Sewage Disposal System Ordinance, allow percolation rates slower than 120 mpi, with the stipulation that systems with percolation rates exceeding 60 mpi require a design by a Professional Civil Engineer or Geologist, Certified Professional Soil Scientist, or Registered Environmental Health Specialist. That design by a Professional Engineer was presented in the aforementioned March 3, 2015 septic system design report.

Comment: A groundwater study was not conducted.

Response: SALEM assumes this comment is in reference to the following section from the 2012 SWRCB OWTS Policy, Tier 1 [which as noted earlier, do not apply to this project]:

- 7.3 A site evaluation shall determine whether the anticipated highest level of groundwater within the dispersal field and its required minimum dispersal zone is not less than prescribed in Table 2 by estimation using one or a combination of the following methods: [Table 2 states that for percolation rates >120 mpi, minimum depth to groundwater must be authorized by a Tier 2 program]
 - 7.3.1 Direct observation of the highest extent of soil mottling observed in the examination of soil profiles, recognizing that soil mottling is not always an indicator of the uppermost extent of high groundwater; or
 - 7.3.2 Direct observation of groundwater levels during the anticipated period of high groundwater. Methods for groundwater monitoring and determinations shall be decided by the local agency; or
 - 7.3.3 Other methods, such as historical records, acceptable to the local agency.
 - 7.3.4 Where a conflict in the above methods of examination exists, the direct observation method indicating the highest level shall govern.

SALEM notes that during our septic system feasibility study, an exploratory backhoe pit was excavated in the lowest portion of the site in native soils near the local drainage feature — this is considered the worst case scenario for the presence shallow groundwater at the site. The pit, excavated to a maximum depth of 7.5 feet, did not encounter the water table. Our investigation determined, from <u>direct evidence</u> of soil mottling in the test pit as discussed above in the SWRCB Policy (and as observed by EDC representatives), that the highest level of seasonal saturation (water table) was at an approximate depth greater than 48 inches below the surface. SALEM also notes that <u>if</u> under SWRCB Tier 2 authority, a supplemental treatment system such as that proposed would be allowed a minimum separation of 24 inches from the bottom of a shallow dispersal system.

The proposed design employs a dripline dispersal system that will be buried 6 to 12 inches below the surface, maximizing the separation from the water table. SALEM notes that the proposed site grading will generate a fill area where portions of the dispersal system area are planned, thereby increasing the separation of the dispersal system and the seasonal high water table.

(A discussion of fill material will follow in the next comment)



SALEM emphasizes that the primary reason for separation of the bottom of a septic system dispersal system and the water table is to promote the filtration of effluent before it enters the groundwater. The minimum separations listed in most State and local guidelines assume a standard septic system, with no supplemental treatment to reduce the high biologic and nitrogen content that would normally be discharged using a simple passive septic tank and leach line system. The proposed NSF-certified active aerobic treatment system uses a tank where the system influent is sequentially treated in anaerobic and aerobic chambers, then pumped to the dispersal system at rates specifically calculated to maximize soil absorption and minimize the potential for oversaturation. The nitrogen removal rates of active treatment systems often produce an effluent that meets or exceeds State ground water nitrate limits, in great contrast to the generally high nitrate contents in effluent from a standard septic system.

SALEM also notes that the active treatment system will require a minimum of 2 years of semi-annual inspections by a maintenance firm approved by the system manufacturer, including reporting results to the County. The County will also conduct inspections on an annual basis. The treatment system will include telemetry that allows remote monitoring of the system and immediate notification to the maintenance firm of a system malfunction, should that occur.

Comment: Septic system leach lines in fill are not allowed.

Response: SALEM notes that El Dorado County Resolution No. 259-99, *Design Standards for the Site Evaluation and Design of Sewage Disposal Systems*, Section 2.C.6.f. allows the use of fill in the sewage disposal area provided that the percolation rate of the fill material is equal to or slower than the percolation rate of the native material (to limit the potential for "daylighting" of effluent). The March 3, 2015 design report shows dispersal of a portion of the effluent to a proposed fill area to the south of the building. To meet the requirement of the above County standard, the design report recommends that "After construction of the fill slope, percolation testing of the shallow slope soils should be conducted to verify the design specifications."

Comment: The location of the proposed dispersal system does not meet SWRCB requirements for setbacks from waterways.

Response: As discussed above, the proposed OWTS falls under current County, not State, regulations. The nearest potential waterway is along the eastern parcel boundary and has been determined by El Dorado County to be an "ephemeral (seasonal) stream." County regulations require a minimum setback of 50 feet from ephemeral streams — the design report adheres to this minimum setback.

Comment: The proposed construction may affect/fill wetland areas.

Response: The impact of construction on wetlands was not within the scope of the subject septic system design report — this issue is being addressed through permitting processes not associated with the OWTS permitting.

Comment: The proposed septic system may not be appropriate for a possible future site use change.

Response: County regulations for commercial developments require that the site have sufficient area to accommodate 300% expansion. The expansion area is shown on the site plans in the northern portion of the site. The 0.2 gallons/ft²/day design absorption rate recommended in the March 3, 2015 report includes Factor of Safety of 4 — that is, the design assumes an effluent percolation rate 4 times slower than the



slowest rate measured at the site. As such, the dispersal system should be capable of handling as much as four times the volume proposed to be applied, if future usage changes.

We appreciate the opportunity to submit these Comment Responses. Should you have questions regarding this proposal, please contact the undersigned at (559) 271-9700.

Respectfully submitted,

SALEM Engineering Group, Inc.

Bruce E. Myers, PE, CEG/ Senior Engineer / Eng. Geologist

PE 62067 / CEG 2102



SimonCRE Abbie, LLC 5111 N. Scottsdale Rd., Suite 200 Scottsdale, AZ 85250



January 4, 2016

El Dorado County Planning Commissioners 2850 Fairlane Court Placerville, CA 95667

RE: Georgetown, CA – 12-10-15 Dollar General Project Appeal Hearing Response/Action Letter APN's: 0613620110, 0613620210, and 0613620410

Dear El Dorado County Planning Commissioners:

On December 10th, 2015 at the hearing for the appeal of the staff-approved Dollar General Store, to be located at **6322 Main St.**, **Georgetown**, **CA 95634**, the commission members (in the absence of Commissioner Shinault) decided to continue the hearing until the next available commission hearing date to have a vote with the all members of the Commission present and to allow us, as the developer, to address several of the concerns that were brought up at the hearing. In this letter, I will summarize and address those comments.

After much discussion of the look and placement of the building, there were 3 main items that sparked Commissioner comments.

- 1) The height of the architectural tower elements
- The preference for a continuous covered walkway along the Main St. frontage of the building, and
- 3) The placement of the building on the site with regard to Main St. and the location of the trash enclosure.

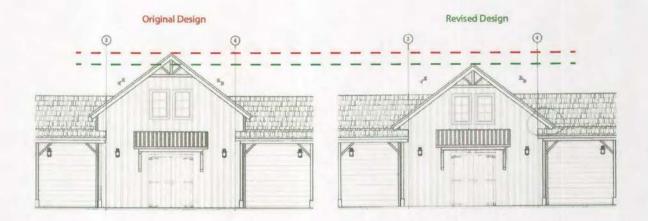
Additionally, there was a request outside of the scope of this project to assess the need for an additional crosswalk across Orleans St., to the south of the project site which the transportation department agreed to review and report back on at the upcoming hearing.

In a continued effort to be good neighbors to the residents of the Georgetown community, SimonCRE (Abbie, LLC) has taken the following actions to address the items discussed at the 12-10-15 Planning Commission Appeal Hearing:

1) <u>Height of the Architectural Tower Element</u> – We have lowered the gabled roof elements by 30". As described in an attached letter by the architectural design firm, MPA Architects, lowering the gabled roof elements 30" is the maximum it can be reduced without negatively affecting: the shed roof underneath (as illustrated below), the aesthetics and the Dollar General signage. We have attached a new color rendering of the elevations that include this



feature change for your consideration.



2) Preference for a Covered Walkway – We have added this feature as shown in the color elevation rendering mentioned previously, though we (and our architects) strongly believe that it detracts from overall aesthetic appeal of the building (also noted in the letter from MPA Architects).



3) Placement of the Building with regards to Main St. and the Trash Enclosure Location – We have not changed the location of the building for the numerous reasons outlined in the letters from our civil (TTG, Corp.) and septic (Salem Engineering) engineers. As described, there are numerous grade change issues with moving the building closer to Main St. in addition to septic field issues with setbacks and other challenges that have been vetted through the Planning Dept. review and MND processes.



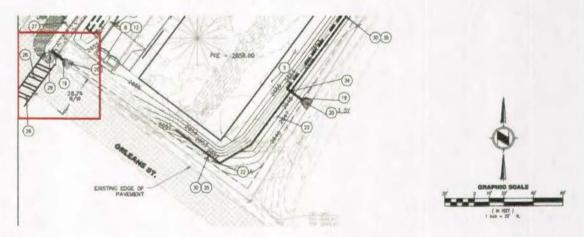
As one of the concerns discussed was the location of the trash enclosure and its visibility from Main St., we have provided a color elevation of the trash enclosure showing how we intend to screen it using the landscaping elements on the landscape plan. See below for a snippet of the file and please refer to the attached trash enclosure elevation for more detail.



4) Adding a Crosswalk across Orleans St. – Though the addition of the crosswalk was not warranted by either the County Transportation Department or the Traffic Engineer's Traffic Impact Analysis at any time during the past year and a half planning review process, the County Transportation Department has taken the County Commissioners' concern under reconsideration and is currently looking into a solution to add the crosswalk. We feel that the cost of this upgrade to the County infrastructure is minimal when weighed against the benefits it will provide to the community as a whole and have decided to add this to our project scope at our sole cost, if the County Transportation Department concludes it is appropriate. As shown in countless instances, through our consistent community outreach efforts, we believe in responsible development practices to ensure the needs and safety of the residents have always been taken into consideration, and we are happy to provide this benefit to the residents.



However, as there is a good bit of engineering to be done to the drawings to connect the crosswalk to the proposed sidewalk in the plans (among other considerations), we won't have final revised plans with the crosswalk until we get closer to the upcoming continued hearing date, but I have included an exhibit that shows what is proposed and have included a snippet of that exhibit here below. We will make every effort to provide such revised plans to the County in time to make them available to the public, prior to or at the hearing.



In conclusion, we feel that through our consistent efforts to work with the community, and our continued efforts (as outlined above) to work with the County and the Planning Commission, we have gone above and beyond to address the requests as completely as is possible, while attempting to keep this development as much of a "win-win" for all parties involved. We respectfully request your support for, and approval of, our project.

Please feel free to contact us for any further clarification and thank you for your consideration.

Respectfully,

Dan Biswas

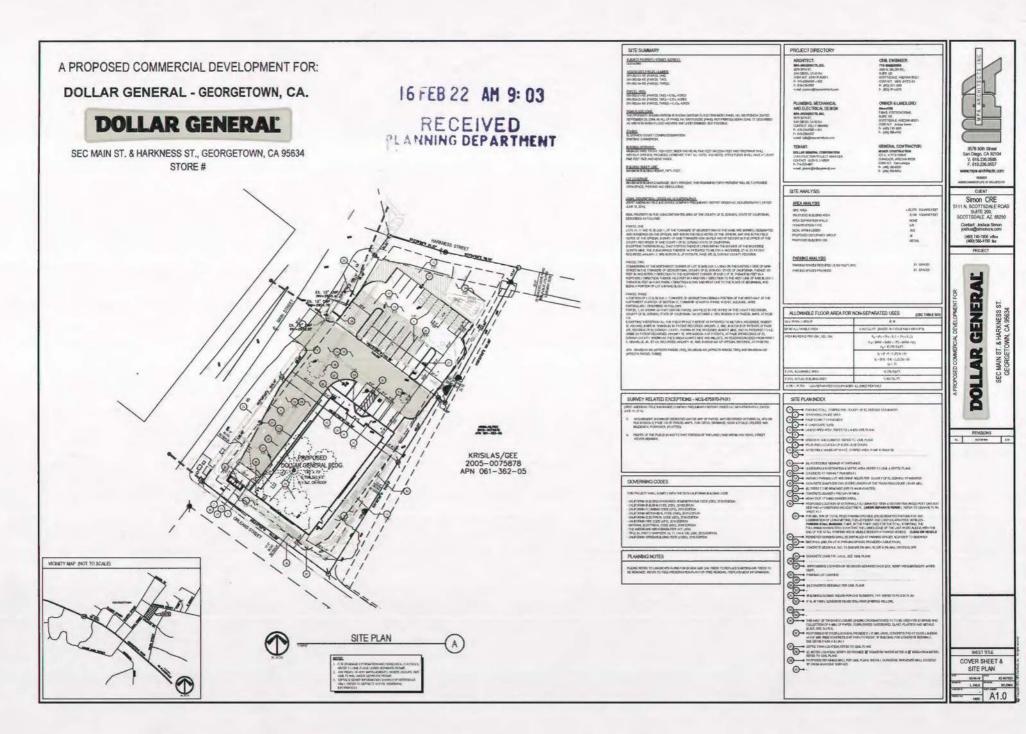
Vice President of Development

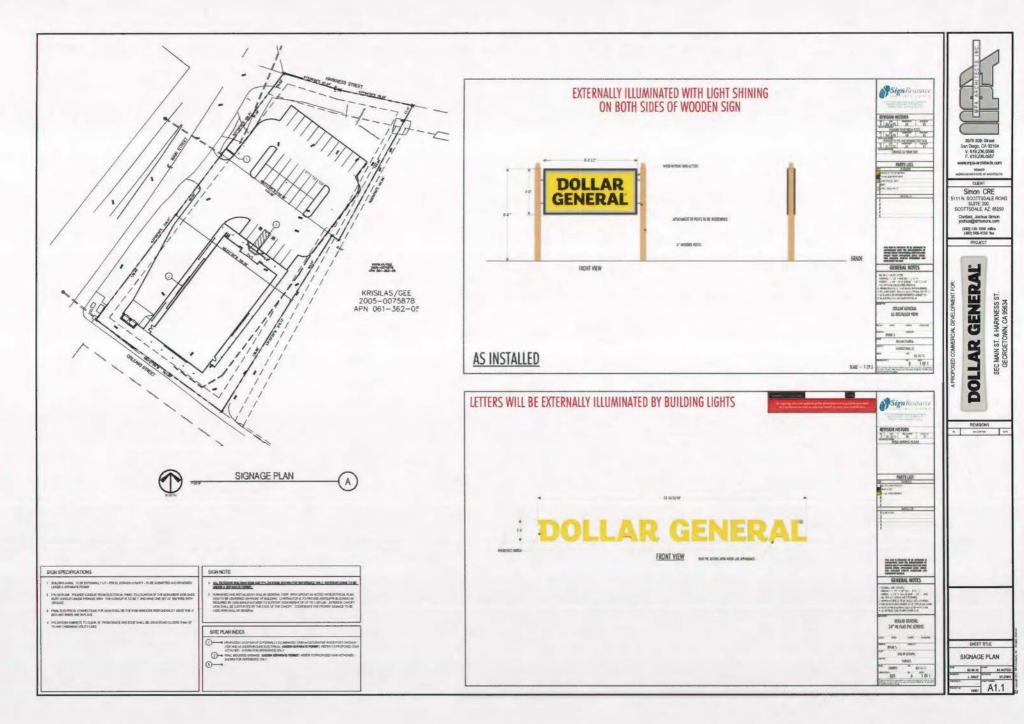
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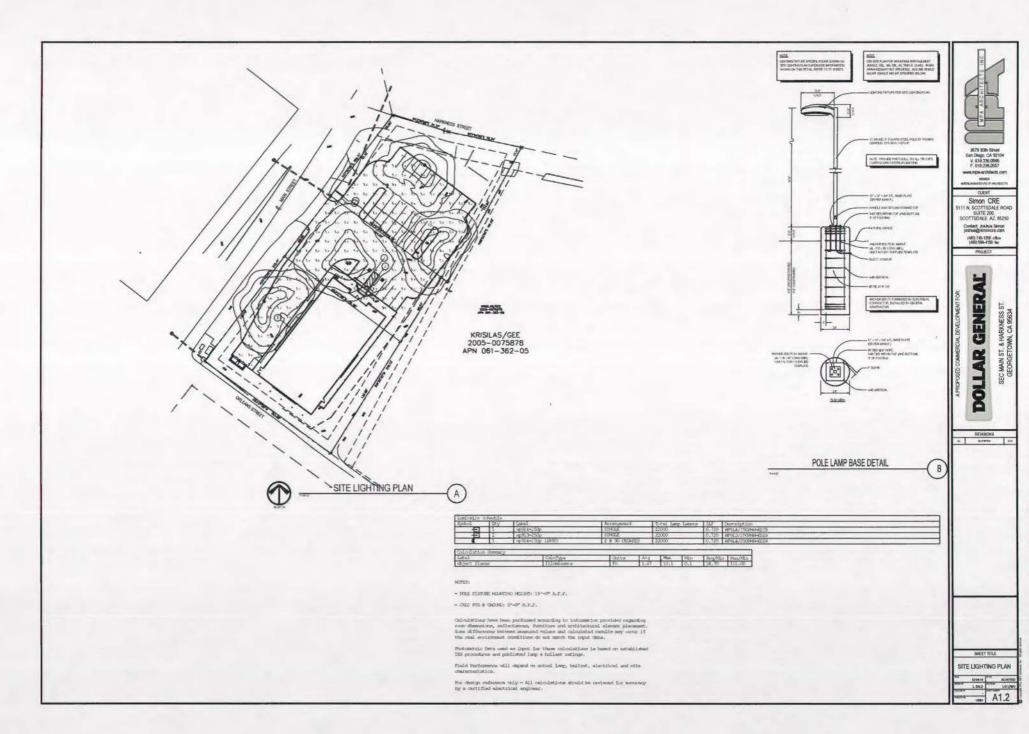
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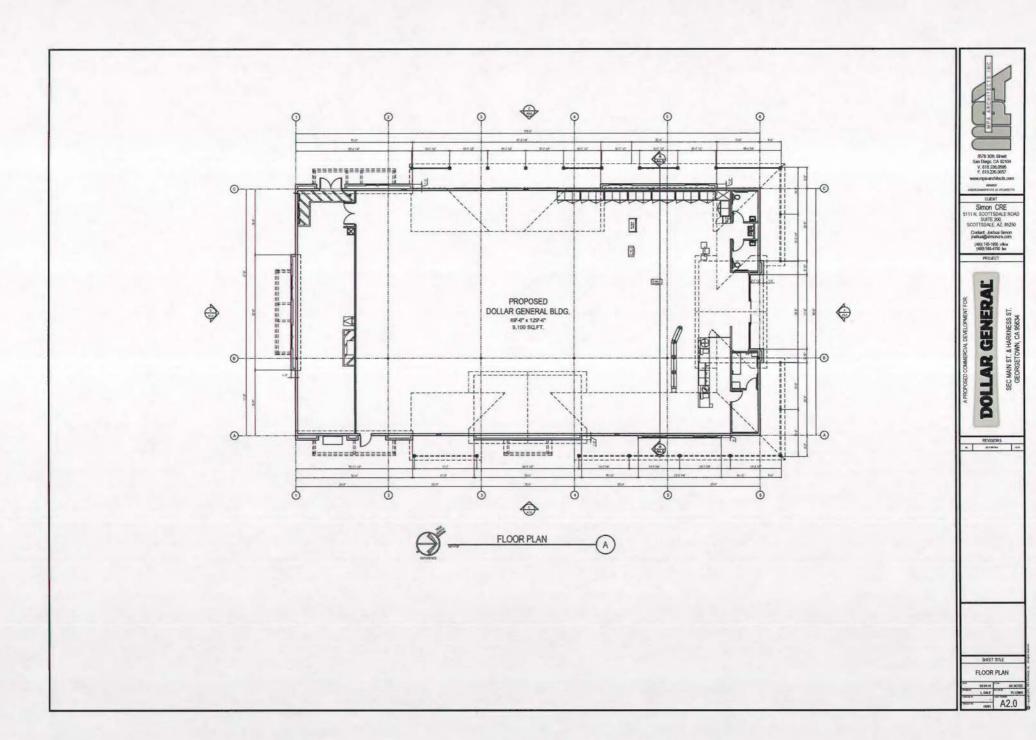
dan.biswas@simoncre.com

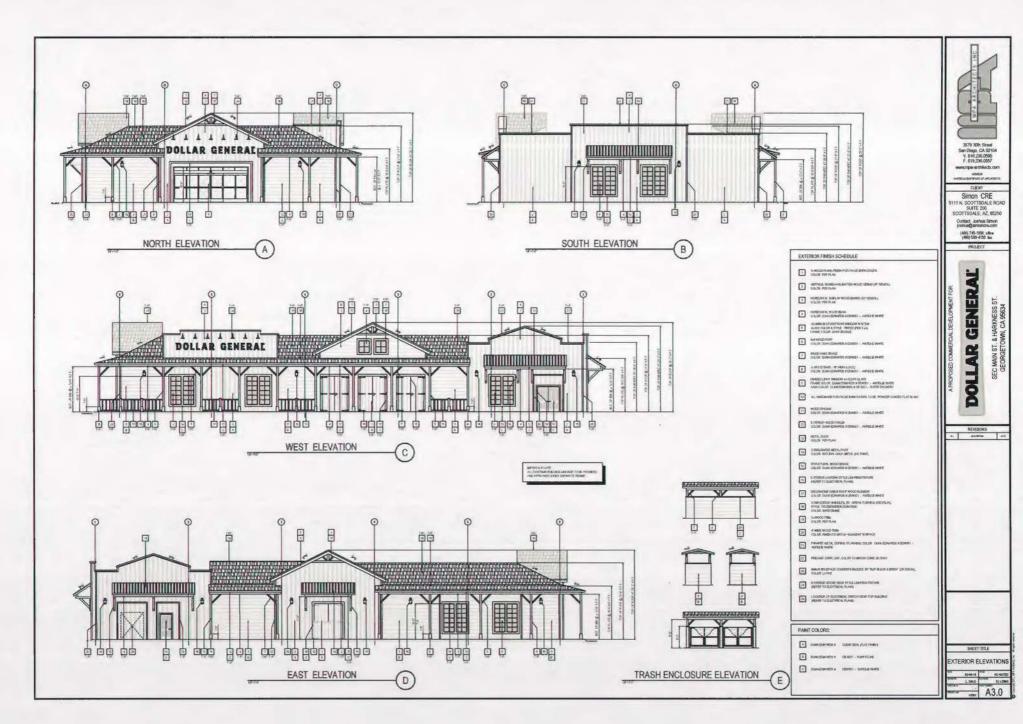
cc: Rob Peters and the El Dorado County Planning Department Staff

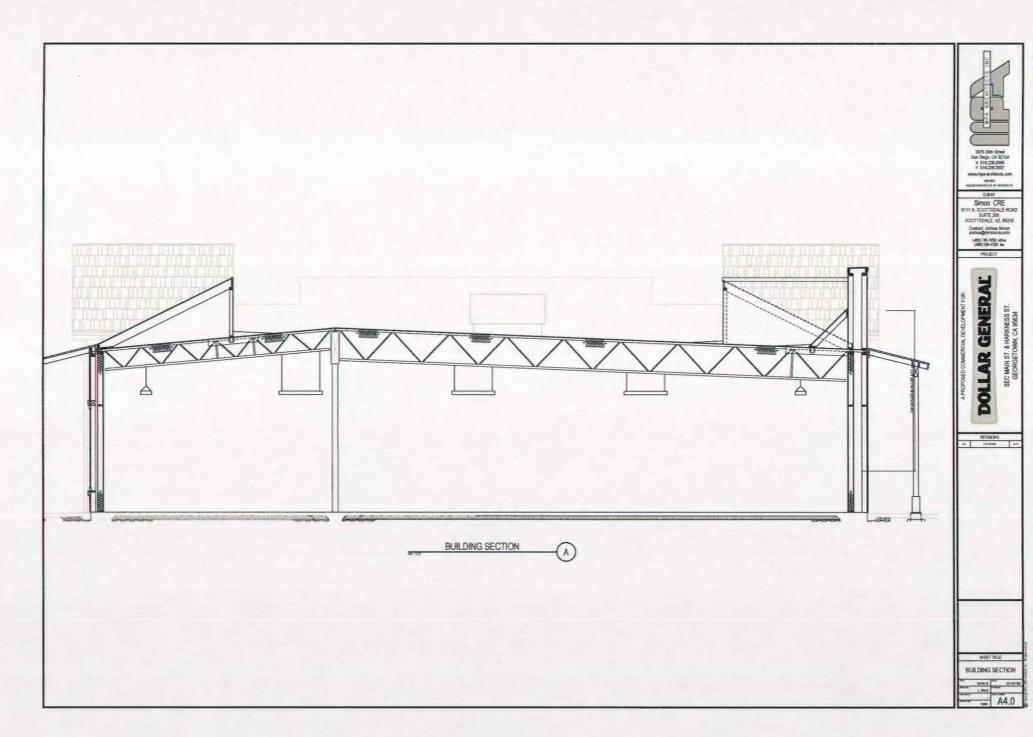












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HERITAGE ARCHITECTURE & PLANNING



16 FEB 22 AM 9: 04

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MEMORANDUM

DATE:

February 16, 2016

TO:

Mr. Dan Biswas, VP of Development - SimonCRE

SUBJECT:

El Dorado Design Review

Dollar General, Georgetown, CA

Heritage Architecture & Planning has completed our design review for the proposed Dollar General store in Georgetown, California in order to confirm the proposed design's compliance with the Historic Design Guide for El Dorado County.

Heritage previously provided letters of opinion on March 5th, July 27th, and December 29th, 2015. We have also reviewed the revised exterior elevation drawings (attached for reference) provided via email on February 11, 2016. Changes to the design include the addition of a new façade treatment to further differentiate the south, east, and west elevations, creating the illusion of multiple attached storefronts. The new facade elements have vertical board-and-batten siding and raised parapets.

The proposed design changes do not alter our previous conclusion that the design and color scheme appear to be in general compliance with the Historic Design Guide for El Dorado County.

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February 4, 2016

SALEM Project No. 4-214-0831 EAS Project No. EAS-14-406

RECEIVED

Mr. Dan Biswas
SimonCRE
5111 N. Scottsdale Road, Suite 200

(480) 745-1956: Phone Dan, Biswas@SimonCRE.com: Email

Scottsdale, AZ 85250

SUBJECT: EDC FILE #15-1409

RESPONSE TO PUBLIC COMMENTS

JANUARY 14, 2016 EDC PLANNING COMMISSION MEETING

PROPOSED DOLLAR GENERAL MARKET STORE SEC MAIN STREET & HARKNESS STREET

GEORGETOWN, CALIFORNIA

Dear Mr. Biswas:

At your request, SALEM Engineering Group, Inc. (SALEM) is pleased to submit the following response to public comments regarding the On-Site Wastewater Treatment System (OWTS) system currently proposed to be constructed at the subject site. SALEM previously prepared and submitted a March 3, 2015 Revised On-Site Wastewater Treatment System (OWTS) Feasibility Study under a Subcontracted Engineering Services agreement with EAS Professionals. We understand that selected public comments regarding that report were submitted to El Dorado County (EDC) on January 11, 2016, and were reiterated in person during the January 14, 2016 EDC Planning Commission meeting.

The responses below are presented in the general order of the comments provided. The comments have been paraphrased, but we believe the comment subject remains clear.

Comment: The volume of the septic system inflow appears low.

Response: SALEM based the given value (300 gallons per day) on water usage for same-configuration Dollar General stores in Northern California. This is often preferable to using wastewater flow volume assumptions based on the number and type of plumbing fixtures, as the estimate used is based on actual, measured flows under conditions similar to those anticipated once built. SALEM has used this method during previous commercial septic system designs, as many other counties in California (including El Dorado County) allow [and often prefer] same-configuration store water usage if available.

Comment: The percolation test results ranged from 32 to 231 minutes per inch (mpi), and the State Water Resources Control Board (SWRCB) 2012 OWTS policy— Tier 1 authority — does not allow rates slower than 120 mpi.

Response: El Dorado County has not yet submitted a Tier 2 Local Agency Management Program to the SWRCB for approval, but plans to within the next few months. As such, EDC is currently allowed to continue as the jurisdictional agency for OWTS and may apply its own Environmental Health Department OWTS guidelines. These guidelines, as codified in the current EDC Private Sewage Disposal System Ordinance, allow percolation rates slower than 120 mpi, with the stipulation that systems with percolation rates exceeding 60 mpi require a design by a Professional Civil Engineer or Geologist, Certified Professional Soil Scientist, or Registered Environmental Health Specialist. That design by a Professional Engineer was presented in the aforementioned March 3, 2015 septic system design report.

Comment: A groundwater study was not conducted.

Response: SALEM assumes this comment is in reference to the following section from the 2012 SWRCB OWTS Policy, Tier 1 [which as noted earlier, do not apply to this project]:

- 7.3 A site evaluation shall determine whether the anticipated highest level of groundwater within the dispersal field and its required minimum dispersal zone is not less than prescribed in Table 2 by estimation using one or a combination of the following methods: [Table 2 states that for percolation rates >120 mpi, minimum depth to groundwater must be authorized by a Tier 2 program]
 - 7.3.1 Direct observation of the highest extent of soil mottling observed in the examination of soil profiles, recognizing that soil mottling is not always an indicator of the uppermost extent of high groundwater; or
 - 7.3.2 Direct observation of groundwater levels during the anticipated period of high groundwater. Methods for groundwater monitoring and determinations shall be decided by the local agency; or
 - 7.3.3 Other methods, such as historical records, acceptable to the local agency.
 - 7.3.4 Where a conflict in the above methods of examination exists, the direct observation method indicating the highest level shall govern.

SALEM notes that during our septic system feasibility study, an exploratory backhoe pit was excavated in the lowest portion of the site in native soils near the local drainage feature — this is considered the worst case scenario for the presence shallow groundwater at the site. The pit, excavated to a maximum depth of 7.5 feet, did not encounter the water table. Our investigation determined, from <u>direct evidence</u> of soil mottling in the test pit as discussed above in the SWRCB Policy (and as observed by EDC representatives), that the highest level of seasonal saturation (water table) was at an approximate depth greater than 48 inches below the surface. SALEM also notes that <u>if</u> under SWRCB Tier 2 authority, a supplemental treatment system such as that proposed would be allowed a minimum separation of 24 inches from the bottom of a shallow dispersal system.

The proposed design employs a dripline dispersal system that will be buried 6 to 12 inches below the surface, maximizing the separation from the water table. SALEM notes that the proposed site grading will generate a fill area where portions of the dispersal system area are planned, thereby increasing the separation of the dispersal system and the seasonal high water table.

(A discussion of fill material will follow in the next comment)



SALEM emphasizes that the primary reason for separation of the bottom of a septic system dispersal system and the water table is to promote the filtration of effluent before it enters the groundwater. The minimum separations listed in most State and local guidelines assume a standard septic system, with no supplemental treatment to reduce the high biologic and nitrogen content that would normally be discharged using a simple passive septic tank and leach line system. The proposed NSF-certified active aerobic treatment system uses a tank where the system influent is sequentially treated in anaerobic and aerobic chambers, then pumped to the dispersal system at rates specifically calculated to maximize soil absorption and minimize the potential for oversaturation. The nitrogen removal rates of active treatment systems often produce an effluent that meets or exceeds State ground water nitrate limits, in great contrast to the generally high nitrate contents in effluent from a standard septic system.

SALEM also notes that the active treatment system will require a minimum of 2 years of semi-annual inspections by a maintenance firm approved by the system manufacturer, including reporting results to the County. The County will also conduct inspections on an annual basis. The treatment system will include telemetry that allows remote monitoring of the system and immediate notification to the maintenance firm of a system malfunction, should that occur.

Comment: Septic system leach lines in fill are not allowed.

Response: SALEM notes that El Dorado County Resolution No. 259-99, Design Standards for the Site Evaluation and Design of Sewage Disposal Systems, Section 2.C.6.f. allows the use of fill in the sewage disposal area provided that the percolation rate of the fill material is equal to or slower than the percolation rate of the native material (to limit the potential for "daylighting" of effluent). The March 3, 2015 design report shows dispersal of a portion of the effluent to a proposed fill area to the south of the building. To meet the requirement of the above County standard, the design report recommends that "After construction of the fill slope, percolation testing of the shallow slope soils should be conducted to verify the design specifications."

Comment: The location of the proposed dispersal system does not meet SWRCB requirements for setbacks from waterways.

Response: As discussed above, the proposed OWTS falls under current County, not State, regulations. The nearest potential waterway is along the eastern parcel boundary and has been determined by El Dorado County to be an "ephemeral (seasonal) stream." County regulations require a minimum setback of 50 feet from ephemeral streams — the design report adheres to this minimum setback.

Comment: The proposed construction may affect/fill wetland areas.

Response: The impact of construction on wetlands was not within the scope of the subject septic system design report — this issue is being addressed through permitting processes not associated with the OWTS permitting.

Comment: The proposed septic system may not be appropriate for a possible future site use change.

Response: County regulations for commercial developments require that the site have sufficient area to accommodate 300% expansion. The expansion area is shown on the site plans in the northern portion of the site. The 0.2 gallons/ft²/day design absorption rate recommended in the March 3, 2015 report includes Factor of Safety of 4 — that is, the design assumes an effluent percolation rate 4 times slower than the



slowest rate measured at the site. As such, the dispersal system should be capable of handling as much as four times the volume proposed to be applied, if future usage changes.

We appreciate the opportunity to submit these Comment Responses. Should you have questions regarding this proposal, please contact the undersigned at (559) 271-9700.

Respectfully submitted,

SALEM Engineering Group, Inc.

Bruce E. Myers, PE, CEG / Senior Engineer / Eng. Geologist

PE 62067 / CEG 2102

