

El Dorado Hills Area Planning Advisory Committee 1021 Harvard Way El Dorado Hills, CA 95762 2017 Board Chair Tim White vice Chair John Raslear Secretary Kathy Prevost

April 11, 2017

TO: El Dorado County Planning Commissioners, Jeff Haberman, Gary Miller, Jeff Hansen, James Williams and Brian Shinault

RE: April 13, 2017 Planning Commission Meeting, Item number 2. 17-0381 Hearing to consider the Serrano Village J5/6 project consisting of 36.03 Acres for 148 homes in the El Dorado Hills Area –SP13-0002, Rezone Z13-0002/PD13-0001/Tentative Subdivision Map TM13-1511 -

Subject: Storm Water Drainage to Bass Lake Overflow for 12 acres of the Serrano Village J6 proposed subdivision

Recommendation: Conditional support of the Serrano Villages J/5/6 project as long as the stormwater system directed toward the Bass Lake Overflow and Bass Lake follows best management practices to minimize the potential impacts to the wetlands.

To the Planning Commissioners:

History tells us that Bass Lake was originally known as the American Reservoir and served the needs of residents as far away as Clarksville from the early 1860's. Bass Lake and the Bass Lake Overflow are deemed to be wetlands (including two historic wetlands) and are listed in the US Fish and Wildlife National Wetlands Inventory. In the El Dorado Hills Specific Plan, Bass Lake is stated as having "a special value as wildlife habitat". Bald Eagles have wintered in the area for well over 50 years and American White Pelicans have been frequent visitors along with Swans, Blue Heron, Great Egrets, Golden Eagles, and many other birds and waterfowl.

In 2014, the Subcommittee tried to clarify exactly how the runoff, soil erosion, stormwater, etc., would be handled for Serrano Village J6 because of the close proximity of this project to the Bass Lake wetlands (Overflow) which is east of Bass Lake Road. Since the Overflow has connectivity to Bass Lake, there was concern that ultimately Bass Lake and its vibrant ecosystem would be affected as well as the north branch of Carson Creek. At that time, the project was being planned for 119 homes.

ATTACHMENT 3

A Staff Report from a prior approval of Village J5/6 in 2010 stated the project would be "served by El Dorado Irrigation District (EID) water, recycled water, waste water, and storm drain systems". (March 11, 2010, Page 5) To the best of the Subcommittee's knowledge, EID does not offer storm drain systems and, in fact, this was referring to the Bass Lake Overflow.

The staff report for the current 2017 project for Village J5/6 on page 5 states the tentative Subdivision Map was submitted and deemed complete for processing on February 12, 2013. Therefore, the current project will not be subject to new regulations such as the Storm Water Pollution Regulations. The drainage plans for Village J6 show stormwater directed toward the Bass Lake Overflow from the homes on the slope adjacent to it.

Research into the use of natural wetlands for stormwater treatment shows it has the potential of altering not only the Bass Lake Overflow but also Bass Lake itself.

"Allowing natural wetlands to treat stormwater runoff increases the depth of temporary or permanent ponding in a wetland. Over time, the altered hydrology transforms a natural wetland into a stormwater wetland with the loss of biological diversity and functional value. To prevent this from occurring, communities should review their existing stormwater ordinances to make sure they prohibit the use of natural wetlands for stormwater treatment." (Wetlands-at-risk protection tool from the Center for Wetland Protection)

The EPA in "Protecting Natural Wetlands says "Wetlands can provide water quality benefits that should be considered when developing or implementing watershed planning. However, because natural wetlands are waters of the United States they must be afforded the same protection from degradation as any other receiving water. The wide variability of wetland types and the range of potential impacts from runoff make it very difficult to recommend a particular methodology to protect wetlands. EPA believes, however, that the use of natural wetlands for control of runoff should be avoided."

Historically, a property being developed is allowed to continue to discharge runoff to a location as long as it does not increase the amount of runoff. However, any added runoff needs to be offset and peak runoff flows are required to be mitigated to pre-development condition. The Subcommittee understands from a meeting with the proponents today that the current plan for Serrano Village J6 calls for two stormwater capture basins to accomplish this and to improve the water quality.

Therefore, we conditionally support this project as long as the stormwater system directed toward the Bass Lake Overflow and Bass Lake follows best management practices to minimize the potential impacts to the wetlands.

APAC appreciates having the opportunity to provide comments. If you have any questions please contact Tim White, 2017 APAC Chair at <u>tjwhitejd@gmail.com</u>, John Raslear, Vice Chair at <u>jirazzpub@sbcglobal.net</u>, or Secretary Kathy Prevost at hpkp@aol.com.

Sincerely,

Ellison Rumsey, Former APAC Chair Kathy Prevost, Subcommittee Chairman

CC: 2017 APAC Committee Chair Cc: EDCO Planning Commission EDCO BOS, APAC read file

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