

Sunset Specific Plan EIR Comments

My wife and I both commented at the February 14, 2019 Planning Commission meeting regarding this project. I have also included the comments I made during the NOP comment period, in an attachment, at the bottom of this email. As I stated at the public hearing on the 14th, we were disappointed to find out you were not going to answer all of the questions and comments received during the NOP comment period, but instead they would be “considered during analysis of potential impacts”. We feel all comments received about this project should be answered and or responded to by the county. Not just our comments, but ALL comments. The impression we are getting is that comments are just part of the “process” that you are going through, i.e. scoping meetings, comment periods, Planning Commission Meetings where the county staff does a 1-2 hour song and dance about how great the project is-but the audience only gets three minutes to talk-with no response to those questions or comments, etc etc. The appearance is your staff is “checking the boxes”, but doesn’t really care what the people/groups have to say. The following are questions and comments we would like answered/addressed:

First, we would like our questions answered and our comments addressed from the NOP comment period. Our other questions and comments follow.

Section 4.2-4: Cumulative conversion of Farmland to nonagricultural use:

-It states that “The project would result in the conversion of almost 6 percent of Placer County’s total farmland.” In the Lincoln News Messenger dated Thursday February 21, 2019 it states that Placer County just bought 300 acres on the western edge of the county to convert what was once irrigated pasture back into wetland and species habitat. That is another 300 acres out of agriculture production. It seems as if the “right to farm county” is singlehandedly removing farmland from within its boundaries. We are all for conservation, but conserving land for wetlands and species habitat, is not the same as protecting farming and farmland. You should be *protecting farmland*, which in turn would provide wetlands and species habitat.

Several different chapters:

-Your EIR/project is based on a number of items/programs that are not currently in effect.

--Chap. 4.9 references the Placer County Conservation Plan (“PCCP”). The PCCP however is not adopted nor has it been circulated for public review and comment. How can the public and the decision makers consider the PCCP in the context of the EIR if it has not been publicly disclosed? If not adopted, how can the Sunset Plan

and EIR adopt goals based on the PCCP (e.g. protecting stream channels as defined in the PCCP (see Policy PFS-5.3 for example).

-In one section of the EIR it states that the Ophir Water Treatment Plant will break ground in 2018. Not only did that NOT happen, according to PCWA, it could be 2029 before they break ground

- The Pleasant Grove Retention Facility is out of your control totally, but yet it is discussed at length at how you have no project without it, is that the best you could come up with?

-The Groundwater Sustainability Plan is not and will not be finished for years

-Your project/EIR counts on recycled water quite heavily, but that is currently not and will not be available for quite some time

How many private projects for private developers has Placer County approved when it was based on things that don't currently exist? Are you setting a precedence that says to future development projects-as long as it might exist sometime in the future you can move forward with your project?

Chap. 4.9 - Hydrology and Water Quality:

-The EIR indicates there are presently two existing PCWA Wells at 1000 acre feet per year. And it also appears to indicate that two new wells would be drilled also at a capacity of 1000 acre feet per year. Is this accurate? How many wells are anticipated to be part of the project - 4 wells altogether for dry year water production? Or are there only two wells (e.g. the present PCWA wells)? It is difficult to tell from Chap. 4.9 of the EIR.

--The EIR does not appear to consider the 6 new wells proposed by the City of Lincoln for Village 5 when analyzing **cumulative impacts** - why not?

--What is the condition or mitigation measure that is enforceable that will limit the wells to single-dry year pumping only?

--The EIR discusses the monitoring of adjacent wells during the use of the Sunset Area Plan wells to determine potential adverse uses as mitigation. What does the Plan consider to be an adjacent well? For example, would existing agricultural wells north of the Plan area be included in the monitoring program?

--What conditions or enforceable mitigation plan is there under this plan that would compel and enforce such well monitoring?

--There does not appear to be any analysis regarding the impacts of dry-year pumping on flows in Auburn Ravine – correct from the wells? Wouldn't dry year pumping of

over 2000 to 4000 acre feet per year of groundwater potentially impact flows in Auburn Ravine?

--While we do recognize that there are many sources of water being discharged into Auburn Ravine, the inference in the EIR that little to no flows existed in Auburn Ravine during the Fall is incorrect. The Scheiber family has diverted water from the Ravine for 100 years and before delivery from PCWA, there was adequate fall flows to accommodate water diversions from the Ravine for use on our property.

- - If at some point in the future, the wells are to be used more often than set forth in the EIR, will there be a requirement for additional environmental review prior to allowing any additional pumping? Will that be a condition of approval of the Plan?

--Placer County and PCWA agree. do they not, that the wells for this project would not have priority over landowners with existing overlying groundwater rights - correct? If they do not agree, then why not? Why would a municipal well have priority over an overlying groundwater right - or have equal priority? Has the County done any analysis of impacts of pumping proposed for the project on existing overlying wells for agricultural uses?

--There appears to be no plan, mitigation measure or contingency – or study – relating to the potential for contamination of groundwater from the Landfill. Why was this information omitted from the EIR? While the EIR references the landfill and its regulation by the RWQCB – there is no contingency or evaluation of potential contamination to groundwater resources. In section 4.9.2, page 4.9.6, under Groundwater Quality; it says “Contamination of groundwater with VOC’s was first identified at this site in 1995” (landfill). If there are a total of four wells that all get turned on in times of drought, as well as all of Lincoln’s wells, what will the cumulative effect be on spreading the contamination throughout the “regional cone of depression” that is discussed on page 4.9.6 under Groundwater Hydrology?

-Flooding seems to be an issue that is completely solved by the Pleasant grove Retention Facility and the City of Lincoln’s Lakeview Farms. But, as noted on page 4.9.30, four paragraphs up from the bottom, the County does not control either one of those sites AND neither one, as mentioned earlier, is complete. So is the flooding problem really solved?

Thank you,

Albert Scheiber, Scheiber Ranch

12/15/16

Notice of Preparation for Sunset Area Plan / Placer Ranch Specific Plan

To whom it may concern or cares;

I attended the 6:00-8:00 p.m. NOP Scoping Meeting on November 29, 2016. I've been to a lot of meetings but apparently never a scoping meeting. I did not realize there would be no answers given, only questions taken. I did not want to waste everyone's time with my concerns so at the conclusion of the meeting I was looking for a copy of the paperwork the eight or so attendees picked up on their way in. There were none left. I guess the eight or so attendees at the earlier meeting grabbed up all the extra copies. I ended up with about 7 or so of the staff around me wondering what my concerns were and willing to answer my questions because of the extra time they had available. I appreciated that, so I proceeded to ask my questions. It didn't take long before there was only one staff member left and the others had slowly drifted away. Guess they didn't want to answer my questions after all. So here are some of my questions/concerns:

1. How do I get the same benefit of the County fronting all the money, staff and time it takes to take a piece of property through the development process? In other words, if our property ever develops, how do I get that benefit paid for by the people of Placer County with no money out of my pocket?
2. If in the past two other private developers lined up to take on this project, then decided for whatever reason it would not work for them, doesn't this raise a red flag that the project is not a good project? I.e. Too much up front money to complete, no guarantees of potable water, too many environmental issues to mitigate, too much of the project would need to be dedicated (given away)making it unprofitable, etc etc.
3. How long will it be before you close the dump? In my opinion, by moving forward with this project the days are numbered for the dump, especially with the college dorms directly across the road from it. I live several miles away and in the summer it is not uncommon to smell it. The cupcakes living across the street from it will need a hepa filter in their safe room.
4. When did Placer County get into the "for profit" business? I asked why the County was running this project; the response was that the County felt the college was going to be a big money maker and economic draw.
5. How is a private developer supposed to compete with the County? PCWA is already installing potable water lines to supply the project, the PCCP is going to gain a large amount of land set aside for them, the Placer Parkway is on the wish list for a number of agencies, the dump is somewhat under County control, the private property owners are getting the benefit of the project at no cost to them, if a private developer fights against this project with any of these agencies or the county itself they will be on a short list, sounds to me like all the main wheels have been greased to avoid any major opposition. How is a private developer supposed to compete with the County?

6. Why is there no shortage of water for your project, but there is for others? I am in Zone 5 of the PCWA. Every year there is some kind of drama for us to get our raw water for the summer, but as stated above, PCWA is installing potable water lines to service your project before it's off the ground.

7. How can you move forward with a project with important items not in service? The potable water is to come from a plant that has not broken ground for construction yet. The PCCP is not approved. We don't have a regular shuttle to Mars.

8. How does this project or any development help agriculture? Seems like a lot of agriculture land will be lost with this project. Preserving some land with PCCP does not make up for the land lost for agriculture forever. I have the utmost respect for the Placer County Agriculture Department, but they are constantly losing productive land to development.

9. How is PCWA drilling wells for this project going to help sustain the ground water table? I was told at the scoping meeting PCWA will drill 2 wells just for this project, but only for emergency purposes, drought etc. I don't think that will help my wells in a drought.

I misplaced the business card from the lady at the Scoping Meeting that was the only one that stayed around to answer my questions. She was the one greeting all 8 of us (+or-) that attended the meeting. I would like to thank her for her time.

Sincerely,

Albert Scheiber

P.O Box 250

Lincoln, CA 95648