

February 14, 2019  
Placer County Planning Commission  
Sunset Area DEIR review

#### Technical flaws and deficiencies

4.10-8

Policy 4.G.11

“When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the DOMINANT LAND USE IN THE AREA. In order to PROTECT THESE FACILITIES from INCOMPATIBLE encroachment, new residential land uses shall be separated from the property lines of active and future landfill sites by a buffer of ONE MILE.”

4.10-14

“Amendment to reduce buffer from 5,280 feet to 2,000 feet for residential development with the possibility of allowance within 1,000 feet. Resulting in land use INCOMPATIBILITY due to residential development occurring closer to the facility. It is expected that new residents and users within the project area would complain about odor from the landfill and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the landfill to implement additional odor control and reduction measures at the facility and absent measures to control odors at the source could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and COMPATIBILITY of the proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT.”

4.10-15

“Placer County Air Pollution Control District Handbook recommends a one mile buffer around the landfill. The stated purpose of this buffer is to protect the landfill from INCOMPATIBLE encroachment .”

“The landfill is an important and valuable County asset with substantial capacity and permitted to provide many more years of permitted service, the intent of the buffer and other landfill related policies in the General Plan was to separate potentially INCOMPATIBLE uses, protect the landfill, and protect new uses from nuisances. Residential encroachment could create pressures on the landfill

operations, resulting in the need to entertain other solutions: diverting waste to another facility, which could be costly and could result in environmental impacts; or siting a new landfill, which would likely be infeasible given cost, timing, and regulatory considerations. Complaints directed at the landfill have been received from residents more than 2 miles away, primarily about odors.”

“It is likely that residential development ANYWHERE in the Placer Ranch Specific Plan area would be subject to odor from the landfill. Some or many future residents and users could find the odor objectionable. If the less restrictive buffer amendment is implemented with residential development closer to the landfill, it would result in an INCOMPATIBLE use with the landfill.”

#### 4.10-16

“Odor complaints about the landfill could result in enforcement action and/or implementation of additional odor controls.”

Comparing other landfills to the one in Placer County is meaningless. Every landfill has conditions that are unique. Terrain and atmospheric conditions play a large role in the impact to uses surrounding a landfill.

This is not theoretical, we know that even with a mile buffer there are notable complaints.

#### 4.10-17

“Based on the examples it was determined that it is likely that increased development in the vicinity of the landfill will result in an increase in odor complaints which could lead to pressure for the landfill to implement additional odor control measures.”

Enclosing compost operations, counter to what was stated, would be sizable and extremely expensive. The resulting of doing this would not insure that all odors from the operation would be contained.

Transporting waste to another facility would be very costly. Finding an alternative isolated, non-controversial, location within the County to process material or green waste would be nearly impossible.

So called odor neutralizing misters do not eliminate odors, only cover them up. Is a heavy perfume smell of maybe lavender a good alternative. Effectiveness is questionable.

No compensation from the developer or the County has been offered, so any costs related to minimizing the impact of the landfill on nearby properties would have to be absorbed by the ratepayers, which constitutes a large segment of the Placer County population.

Again, it was stated that "Impacts relative to consistency and COMPATIBILITY of proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT.

4.10-18

Where have building design, landscaping design, and deed notification proven to truly lessen the complaints related to a landfill, especially odor impacts?

"These measures would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Therefore this impact would be SIGNIFICANT AND UNAVOIDABLE.

4.3-6

Need to specify that the reference to "alternative daily cover" and more particularly "sludge" is sewage waste from the nearby Lincoln Wastewater plant. It is used to help facilitate the breakdown of waste material in the landfill. The sewage waste was noted as a high contributor in the detection of offensive odors coming from the landfill.

I counted eight times were "incompatibility/incompatible/questioning compatibility" were mentioned in relationship to landfill operations and residential development. Seems like a clear signal that this project as currently presented is not wise and would have wide ranging negative implications to the residents of Placer County.

We are trying to force the preverbal square peg into a round whole. This plan needs to accommodate the landfill rather than the landfill accommodating the plan.

I believe the real test of whether this plan is based on reasonable acceptable facts is whether the developer, or those that prepared the report, or any of you in this room would want to live or have any of your family members live in this community? If you are being truly honest, I think the answer would be "no".