



August 16, 2024

Chuck Beatty
Planning Director, Amador County
810 Court Street
Jackson, CA 95642
planning@amadorgov.org

RE: Wicklow Way Specific Plan Draft EIR Comments

Dear Mr. Beatty;

The City of Sutter Creek offers the following comments on the Amador County Wicklow Way Specific Plan and the Plan's draft environmental impact report (DEIR) released on June 28, 2024.

Summary

- The City of Sutter Creek would like for the County to modify the Wicklow Way Specific Plan (WWSP) to prioritize conveying and treating all WWSP wastewater at the Sutter Creek WWTP and make construction of a new wastewater treatment plant in the WWSP an alternative.
- The City of Sutter Creek is the current provider of wastewater treatment services to Martell under contract with AWA. An existing lift station conveys the effluent to Sutter Creek near Valley View Way and from there it is gravity fed down to the treatment plant.
- The City of Sutter Creek is engaged in a planning process for wastewater treatment plant upgrades and/or replacement. Expanded capacity for wastewater collection lines serving Martell are also in the process of being installed. Depending on the timing of the development of the WWSP, Sutter Creek should be able to provide service through the existing AWA customer agreement. An additional or expanded lift station would be needed for the additional effluent plus new sewer mains to connect WWSP to the existing Martell wastewater lines.
- Use of an upgraded Sutter Creek WWTP would result in numerous environmental benefits compared to wastewater treatment onsite. A list of the environmental benefits is outlined below.

Project Description – Wastewater Treatment

- The following excerpts from the DEIR Project Description support the use of the Sutter Creek WWTP for buildout of the WWSP.
- Page 2-23 of the DEIR incorrectly states “Sanitary sewer service in this area is provided by AWA. Existing lines are located at both the southern terminus of Wicklow Way and the western terminus of Westview Drive (north of Argonaut High School). However, to meet the conveyance and treatment requirements associated with the proposed Project, a WWTP and lift station are proposed in the northwestern portion of the WWSP site (see Figure 2-4). All sewer improvements would be constructed to AWA standards.” Sutter Creek/ARSA is the correct provider of current wastewater collection and treatment services to Martell under contract with AWA.
- Page 2-24 of the DEIR states “Offsite utility improvement would include the extension of water and sewer lines and may also include increasing the size and capacity of these lines and increasing the capacity of the existing wastewater treatment plant prior to the construction of the onsite WWTP.”
- Page 2-28 (Required Approvals) of the DEIR includes “Approval of wastewater treatment plant capacity including potential for a new onsite wastewater treatment plant by AWA” as a requirement before implementation of the WWSP. No new approvals would be required to use the Sutter Creek WWTP for the WWSP.

DEIR Alternatives

- Alternative 2 provides for offsite treatment of the Specific Plan wastewater at the Sutter Creek WWTP. Analysis provided in DEIR Chapter 6 concludes that Alternative 2 would have a similar environmental impact as the Project.
- Sutter Creek believes that providing treatment of the WWSP wastewater at an upgraded Sutter Creek WWTP would have fewer impacts than onsite treatment proposed in the WWSP (see environmental benefits below).
- Please note that there are several locations in the DEIR that incorrectly reference the City of Jackson WWTP as the potential offsite location for wastewater treatment under Alternative 2 (pages ES-12 and 1-7). Sutter Creek WWTP is correctly identified for Alternative 2 on DEIR pages ES-14, 6-3, 6-11 and 6-31.

Environmental Benefits of Treating Wastewater at Sutter Creek WWTP

- The DEIR states that the Alt 2 Scenario (the Sutter Creek WWTP alternative) would have similar impacts for wastewater treatment, stating that the Sutter Creek WWTP and conveyance facilities would result in a similar level of total ground disturbance. We disagree, conveying all of the wastewater to Sutter Creek would result in less new ground disturbance on undeveloped lands because conveyance facilities would likely follow existing transportation corridors/disturbance and the Sutter Creek WWTP expansion would occur at an existing and disturbed site and not on 10 acres of currently undeveloped

land. Conveying and treating wastewater at an upgraded Sutter Creek WWTP would reduce natural resources impacts compared to the Project.

- The Alt 2 scenario states that using Sutter Creek WWTP would be a benefit to the Specific Plan buildout since the cost of building a new WWTP would not have to be covered solely by the commercial and quasi-public land uses that would precede the residential land uses.
- The expansion of the Sutter Creek WWTP could be staged to better match the anticipated rate of Specific Plan buildout (and financing) than the construction of a new WWTP at the WWSP site.
- Eliminating or reducing the size of the WWTP at the WWSP would be a benefit to scenic/aesthetics. Conveyance of wastewater to the Sutter Creek WWTP would not impact scenic resources and expansion of the existing Sutter Creek WWTP facility creates less new scenic impact.
- Eliminating or reducing the size of the WWTP at the WWSP would be a benefit to air quality/odors. Conveyance of the wastewater to the Sutter Creek WWTP would eliminate or substantially reduce the new odor source at the WWSP and remove the significant and unavoidable impacts identified on page 4.3-31 of the DEIR.
- Eliminating the onsite WWTP would make the reserved parcel of land available for other land uses, perhaps park or residential land uses that are currently planned for more heavily wooded or sensitive sites within the Specific Plan boundary - thereby reducing WWSP buildout impacts to water quality, hydrology and biological resources.
- Conveyance of wastewater to Sutter Creek WWTP and its treatment at the expanded WWTP would use less energy than constructing a second and entirely new WWTP which would include duplication of utility services. Reducing energy use also benefits increased GHG emissions of the Project.
- Operating and maintaining one WWTP instead of two reduces the potential for risk of upset/hazards from disposal of treated wastewater to water bodies, effluent spills or chemical storage leaks.

We appreciate your consideration of our comments and suggestions for addressing the WWSP wastewater utility needs and look forward to working with you in the immediate future to identify improvements to the Project description and CEQA findings.

Sincerely,



Tom DuBois
City Manager, City of Sutter Creek