

Dirk Fulton
768 West H Street
Benicia CA

Dear Sir/Madam,

I write to furnish comments on the City's Initial Study Scoping for the Seeno family Rose Estates project. The large scale of the development and its proximity to the proposed Valero redevelopment project raise significant environmental issues described below and must be considered under scoping criteria:

1. The cumulative impacts of this project together with the neighboring Valero/Signature Properties development which has been presented to the City must be evaluated; see the No Oil case establish this principle and later case law and CEQA regulations.
2. Impacts on City services including Police, Fire, Parks & Recreation and the BUSD must be carefully studied as Benicia has a 1990s era ordinance in the Muni Code requiring that new developments pay their full impacts-both now and in the future.
3. The impact of this development adjacent to the IT Panoche Class I toxic waste dump must be reviewed for long term groundwater and air quality impacts on future residents. The toxic material still rests in place and is upgradient from the project.
4. Water Supply and Sewer capacity must be evaluated. The City already struggles with water supply issues in drought years and the project will exacerbate the problem.
5. Traffic & related GHG issues are compounded by the large residential scale of the project with no or little employment provided within walking or bicycle distance.
6. Scenic vistas and fish and wildlife issues are also to be significantly affected by large earth moving activity and years long construction.

Sincerely,

Dirk Fulton
768 West H Street
Benicia CA