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Sent: Sunday, February 26, 2017 12:10 PM
To: Crystal Geysler <crystalgeysler@analyticalcorp.com>
Cc: dist2sup@sbcglobal.net
Subject: Respose to draft EIR

Attention Ryan Sawyer AICP

The draft EIR states there are several homes within 1000 feet of the proposed plant, called "sensitive receptors". Unfortunately I live in one of those homes. My home is maybe 500 feet to the West of the plant. So I will be most effected by activity at the proposed loading docks. Especially considering the wind is often from the East / South East and I like to have my east facing and South facing bedroom windows open at night during warm weather.

In this letter I will often reference table 2-1 between pages 2-5 and 2-28. My concerns are the "less then significant" determination given in the areas of :

1. Lighting
2. Loading dock noise / truck traffic / idling engines
3. Air pollution
4. Truck traffic on Mt. Shasta Blvd.

1. On page 3-11 the draft EIR addresses lighting in other parts of the plant but doesn't specifically address the West side / loading docks. The draft EIR (pg 3-29) says CGWC will commit to implementing the 1998 mitigation agreement. On page 3-31 that agreement calls for "Shield all exterior lighting to prevent direct light and glare from being emitted onto adjacent properties.... directional lighting ... shall be used (as opposed to flood lighting). The lighting plan in the draft EIR is not complete. I want the final EIR to include mitigation requirements for drop shielding, directional light fixtures and light poles of 10 feet or less. Especially on the West side but really all sides would benefit from less light spillage. Wall packs should be as low as possible and as directional as possible to avoid light spillage on to neighboring properties. The final EIR must include a complete lighting plan.

2. On page 2-21 item 4.6 - 2b " Trucks in loading / unloading queues shall have their engines off when not in use." and 2c " All equipment shall be turned off when not in use. Engine idling of all equipment shall be minimized."

So the question for mitigation of this source of noise and air pollution is - what defines "not in use" and "minimized" ? Who will enforce agreements to insure that trucks are not idling or their refrigerator compressors not running all night ? The draft EIR does address truck noise on Mt Shasta Blvd but does not analyze noise at or near the loading docks. This is a defect that needs to be address in the final EIR. With enforceable mitigation steps. Your neighbors at the very least, need the phone # of a responsible person who can take care of these problems as they arise especially at night.

3. On page 2-5 item 4.2-2 "Expose sensitive receptors to substantial pollutant concentration" determined to be SIGNIFICANT. Mitigation proposed at 4.2 - 1b is "No single employee shall occupy the Caretaker residence for more then 40 hours per week." Yet on page 3-11 the draft EIR talks about the Caretaker residence being for " The caretakers family ... continuous occupation ..." Which is it 40 hours/week or continuous occupation ?

The answer is crucial to those of us living in close proximity to the plant. We do occupy our homes/property 24 / 7 and if the projected air pollution is hazardous to employees exposed over more than 40 hours - what pollution mitigations are proposed for the residences, i.e. "sensitive receptors" in close proximity to the plant ?

This question of air pollution on nearby residences and mitigation steps and enforcement needs to be addressed in the final EIR.

4. I know others particularly the city of Mt Shasta, will be concerned about truck traffic on North Mt. Shasta Blvd. The draft EIR on page 2-25 states "...effects of increased truck traffic on MSB are less than significant." However the analysis is flawed because on page 17 of appendix M, the assumption stated, is that 64.5 % of truck traffic will come from or go to the north. However on pages 3-9 to 3-10 the draft EIR states "...truck traffic will not go downtown...". So where will that other 35.5 % of truck traffic come from or go to ? There is only North or South traffic direction on MSB.

This defective assumption negates the analysis, and needs to be addressed and mitigated in the final EIR.

5. The draft EIR on page 2-19 states the possibility of the later addition of "solar frames" on the South East and North sides of the property. However no analysis is given on possible reflective glare on neighboring properties. Maybe it's assumed another EIR would be made at the time of instillation. I'm all for solar panels but want to be sure everyone has a chance to express their thoughts before actual instillation. So will the solar panels be "grandfathered in" with this EIR or not ? This question should be clearly answered in the final EIR. If another EIR is not required then this final EIR must address and mitigate glare from the proposed solar panels.

6. For what it's worth, my personal preference is for " Alternative B" limited to one bottling line. Operating between the hours of 7 AM to 7 PM, Monday through Friday, including truck traffic at the loading docks and on MSB. This was the original CGWC stated proposal for reopening the plant.

Submitted by
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