



We Advocate Thorough Environmental Review

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August 14, 2019

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Submitted via email:
jlucchesi@mtshastaca.gov

Dear Ms. Lucchesi:

We Advocate Thorough Environmental Review (W.A.T.E.R.) is a California 501(c)(3) non-profit organization incorporated to promote quality local and regional planning, land use and development, as well as to preserve a healthy human and natural environment within the Siskiyou County area.

We are responding to a notice for public comment on the Freeze Mini-Storage and Car Wash Project Initial Study/Mitigated Negative Declaration, Revised, prepared by Michael Baker International, June 2019. Please acknowledge receipt of this document.

We find many issues with the proposed project and IS/MND including insufficient information, erroneous information, and lack of compliance with Municipal Codes, among others as discussed in detail below.

GENERAL COMMENTS

Inappropriate Project: This is a very inappropriate project for the location. The negative impacts to surrounding residences (including loss of property values) and the general unappealing appearance of the project are inconsistent with mandates in the City's General Plan and ordinances. For example, City Zoning for the project area is "General Commercial (C-2)." The examples given in the Code (quoted on page 3.0-36) for suitable uses include veterinary offices, churches, community centers and schools. None of these uses are remotely like the proposed project; none of these uses require an Industrial Waste

Discharge Permit (Appendix A), as does the carwash. Although large scale commercial uses are allowed in C-2 areas, they must be consistent with MSMC 18.70. Looking at the intent of MSMC 18.70, we see the following Purposes that seem to be totally ignored in this IS/MND:

(F) To protect existing residential areas and adjacent neighborhoods from encroachment of commercial land use.

(H) To encourage excellence in urban design and improvement in overall City appearance.

(I) To encourage development that produces a desirable relationship between buildings and the pedestrian and vehicular circulation systems and between such development and adjacent land uses.

(J) To establish specific standards for coordination of landscaping and street trees along public rights-of-way, public pedestrian ways and buffers between dissimilar uses.

(<https://www.codepublishing.com/CA/MtShasta/#!/MtShasta18/MtShasta1870.html#18.70>; accessed 07-24-2-19).

With respect to (F), the proposed project will not only create negative environmental noise, air quality, lighting, and aesthetic impacts for the adjacent residential areas, but will also reduce the property values of the neighboring residences; definitely an encroachment on adjacent neighborhoods. The project is far from an example of excellent urban design and is a detriment to overall City appearance, contrary to (H). Contrary to (I), the project produces an **undesirable** relationship with the adjacent land uses (residences and the Spring Hill Trail) as well as increasing traffic in a very poorly implemented intersection potentially creating a hazard; and (J) the project is in violation of landscaping requirements between it and the residential areas. For these reasons, the carwash/mini-storage project is NOT consistent with the General Plan and Municipal Codes.

Moreover, a mini-storage facility is a type of warehouse, which is allowed in E-C zoned areas, not under C-2 zoning and not as a conditional use under C-2 zoning.

AB 52: The document states that Tribes were notified on May 1, 2019 regarding this project. This violates the AB 52 requirement that Tribes be notified at the **beginning** of project development. Since this project was first revealed to the public in 2017 (the 2017 draft IS/MND makes no mention of AB52 and its requirements or any indication that Tribes were notified), it appears the City is woefully late in initiating AB 52. The City and the community clearly know local water resources are a Tribal Cultural Resource for the Winnemem Wintu Tribe. To whom was notification sent on May 1, 2019 to offer the Winnemem Wintu Tribe the opportunity for AB 52 consultation?

Poor Project Design: CEQA requires that the CEQA approval of the project design incorporate measures to reduce environmental impacts. It is not about creating a poor design in the first place and then creating mitigations to make it look better. We see this in many aspects of this project:

For example, the project description says there will be wire fabric with green slat fencing along the north and east side of the project, but then because this fencing will be ugly, a mitigation is recommended by the City to replace that fencing with "decorative" fencing (although for this reviewer, MM AES-1 only replaces one ugly fence with another ugly fence). Likewise, in the discussion of noise by the dryers, according to the specifications from the manufacturer, the dryer WILL create noise at the nearest residence that will exceed the City's standards, yet the IS/MND does NOT clearly include design features to effectively reduce that noise. Although possible modifications to reduce noise are suggested in the mitigation, the appropriate ones need to be analyzed for their effectiveness and specified to achieve a quantifiable degree of noise level reduction. Quite frankly, I do not see how the applicant can properly evaluate the economic feasibility of this project without a more refined plan.

Project Description: The project description is incomplete. Although page 1.0-2 states the project description "discusses the proposed project in detail," little detail is provided for many sections. Evidence of this lack of "detail" is clear in the mitigations; for example:

MM AES-2: "The applicant shall submit revised landscaping plans for the mini-storage and carwash ..."

MM AES 4: "...the applicant shall submit a lighting report and plan for the entire site..."

MM AIR-1: "Prior to issuance of a grading permit, the City shall ensure the grading plan notes include the following:" this is followed by 11 points that need to be incorporated into the plan.

MM GEO-1: "The project applicant shall prepare and implement a stormwater pollution prevention plan for the property..."

MM GEO-2: "The project applicant shall submit a grading plan..."

MM HYD-1: "The applicant shall prepare and submit a final drainage study and plan..."

MM NOI-2 and MM NOI-3: Prior to operation, the project applicant shall provide a report prepared by a qualified noise consultant..."

MM TRA-1: "Prior to issuance of a grading permit, a Construction Traffic Control Plan shall be submitted..."

MM-TRA-2: "...the applicant shall submit the design for the roadway segment to be paved..."

A third of the mitigations require further planning. The absence of these plans in this IS/MND document precludes the public or relevant agencies from evaluating the potential impacts of those plans. Additional specific deficiencies will be further discussed below.

SPECIFIC COMMENTS

4.1. Aesthetics

Surprisingly, the IS/MND concludes there will be less than significant aesthetic impacts with mitigations. Ask the people living in the homes around the proposed project: would they prefer an empty lot with regenerating vegetation (as existed before the project applicant cut down trees (in violation of City codes) and bull-dozed the lot), or a carwash and storage facility? Ask the people who hike on the Spring Hill Trail: would they like the view from the trail to include 29,000+ sq. ft of rooftop? Ask the people who approach Mt. Shasta from southbound I-5 via Mt. Shasta Blvd: is the first thing they want to see as they enter the City a large storage facility? The Mt. Shasta Community Action Plan 2020 Community Vision states, "Visitors to Mt. Shasta approaching on Interstate 5 and entering the area are impressed by how well the physical development of this dynamic community is harmonized with the beautiful mountain setting." Is the Freeze project consistent with this vision? NO. Mitigations cannot fix the negative aesthetic impacts of this project. As they say, "you can put lipstick on a pig, but it is still a pig."

Fencing: The mini-storage site will be surrounded by fencing; to the northeast by a six-foot high wire fabric fence with green slats and for the remainder (except entryways and the bordering residence) a seven-foot high metal security fence (page 3.0-15). MM AES-1 would make the fencing the same all around--the seven foot fence, so the view from the Spring Hill Trail will be supposedly better. Replacing one ugly fence with another ugly fence will not improve the visual quality of the project site. Let's face it, the fencing (as is the project, in general) is a significant negative visual impact that cannot be mitigated and thus must be evaluated in an Environmental Impact Report.

Landscaping: Page 4.0-5, last paragraph: Regarding landscaping, this paragraph cites the Mt. Shasta Municipal Code as follows: "18.70.080 (J) In addition to other required landscaping, a landscape buffer of 30 feet in width shall be provided adjacent to the site property line where it adjoins residential zones..." However, the project diagrams of Figures 3.0-3, 3.0-4, 3.0-6, 3.0-7, and 3.0-9 clearly show that the majority (approx 75%) of the landscaping adjacent to the Miller residence is significantly **less than 30 feet**. As such, both the mini-storage and carwash components of this project are in violation of this Code. The project would need to be significantly revised to comply with this Municipal Code.

In addition, there is no final landscaping plan for the public to review.

Lighting: Here again, we are just promised a lighting plan will be submitted as per MM AES-4, which outlines much of the information that should be available for public review in this IS/MND. Even with

lights directed downward, reflections off of snow and light-colored surfaces can significantly create overflow into adjoining areas. None of this is presented in this IS/MND.

Please correct this statement: Page 4.0-5, first paragraph, states, "As required under mitigation measure MM AES-1, the species and locations of new plantings shall be shown on an updated landscape plan..." Note that MM AES-1 says nothing about vegetation.

4.3. Air Quality

CalEEMod Calculations: Appendix B, regarding air pollution estimates based on the CalEEMod program incorrectly uses Climate Zone 14 for the calculations. Siskiyou County is in Climate Zone 16, with significantly more heating days. The CalEEMod calculations need to be redone with the correct Climate Zone and this Air Quality section re-evaluated.

Health Risk: the IS/MND states, "Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and associated risk of contracting cancer" (page 4.0-13, last sentence). However, this ignores the short-term impacts of PM 2.5 and other air pollutants (e.g., NO₂) which can have significant negative impacts on cardiovascular health, especially in sensitive receptors (for example, see Pope, CA et al., *Circulation* 2006:114, 2443-2448; Knight, SJ and Howley, P at <https://www.york.ac.uk/media/economics/documents/hedg/workingpapers/1708.pdf>). These short term-health effects must be addressed and mitigated.

Odors: The project description indicates that fragrance will be used in the carwash (page 3.0-18). "Fragrance" can mean a lot of different chemicals, including phthalates, and many people have allergies/sensitivities to "fragrance". For the protection of the nearby residential areas, "fragrance" should be disallowed in the carwash chemicals.

No mention of the odors while paving--these will have significant impacts on the nearby residences. How will this be mitigated?

4.4. Biological Resources

A biologist surveyed the project site on April 21, 2017 and found, "Non-native grassland is the only vegetative community on the project site...(page 4.0-17). This statement ignores the fact that prior to the survey the property owner had removed much of the vegetative community including large cedar trees (in violation of City codes). With respect to the remaining trees, the document notes, "Portions of the western project boundary are lined with planted incense cedar...trees. This small stand of mature trees does not function as its own vegetative community capable of supporting special-status species..." Had the applicant not removed trees prior to the survey, this conclusion may not be valid.

On page 4.0-18 it states, "The non-native annual grassland shows signs of disturbance from vehicle activity..." Of course it does, significant disruption occurred on the site when the trees were illegally removed (see Attachment A)! It is disingenuous to give the impression that disruptive impacts have not already occurred because of this project. A valid biological analysis would take as the starting point the state of the property before the applicant altered it.

4.6. Energy

Operational Energy Use: Figure 3.0-7 shows a propane storage tank on the carwash parcel, on page 3.0-27, it is stated that, "A propane storage tank would be installed by the carwash equipment storage building." There is no other discussion in the IS/MND about how propane will be used: Since the carwash will not have an office or restrooms, for what will the propane be used? -- to heat water for the carwash? -- to heat air for the blowers? --to run the waste water recycle system? There is virtually no detail to inform the reader of how energy will be used for operation of the project. The energy section devotes only one paragraph to the discussion of energy use during operations, (page 4.0-29, last paragraph), and Appendix B, the CalEEMOD calculations for air quality and green house gas emissions (where energy consumption is somewhat analyzed), is unintelligible. It was apparently done with mostly default values for parameters, with only "User Defined Commercial" inputs. There are no details as to what that includes, and of course, it uses the wrong Climate Zone data. Please provide detailed information.

4.8. Green House Gases (GHG)

Appendix B, regarding GHG estimates based on the CalEEMod program incorrectly uses Climate Zone 14 for the calculations. Siskiyou County is in Climate Zone 16, with significantly more heating days. The CalEEMod calculations need to be redone with the correct Climate Zone and this GHG section re-evaluated. Moreover, the GHG calculations need to include the loss of carbon sequestration that has resulted from the project applicant removing numerous mature trees from the site (before project development and in violation of City Ordinances).

In addition, global warming (due in large part to GHG emissions) will result in increasing summer temperatures and increased risk of wildfire. The project could do more to reduce emissions and local heating and sequester carbon; for example, maximize planting of trees, install light-colored pavement, add solar panels to roof tops, reduce energy consumption, etc. These are not guaranteed by compliance with the CALGreen Code.

4.9. Hazards and Hazardous Materials

The City of Mt. Shasta is rated as being in a Very High Fire Hazard Severity Zone. Spring Hill is adjacent to the project site on its north side. A characteristic of wildfire is that it moves rapidly up hill and with the wind. Locally, winds during the wildfire season are predominantly from the south such that a fire that starts at the project site could very rapidly be carried up and over Spring Hill before any fire fighting response could be generated. All buildings in the project site should have automatic sprinkler systems to minimize this potential threat.

The IS/MND states that the storage of hazardous materials and wastes by mini-storage customers would be prohibited through contract terms and conditions (page 4.0-39). However this is no guarantee since there is no enforcement mechanism for this prohibition. And we all know this type of clause is not about public safety but about protecting the mini-storage owner from liability. A risk assessment must take into consideration the probability of non-compliance with the contract terms.

4.10. Hydrology and Water Quality

Water Use: How was the carwash use estimated? Footnote 4 says carwash trips are based on the applicant's engineer's estimates for wastewater flows, but no evidence to justify the value is given. Given the past history of low water pressure in that area, what is the evidence that carwash use will not negatively impact water pressure for the surrounding residences?

Carwash Wastewater: To summarize (page 3.0-17&18; page 4.0-46): The carwash bays will be graded so all the wash and rinse water will go into an underground interceptor tank, then to a recycle system. The floor drain inlets will include sumps for sediment removal, the interceptor tank will be a three-compartment structure that removes settleable solids, grease, and oil, then either sends the clarified wastewater to the City sewer line or to a recycle system consisting of strainers, centrifuge separation, bag filtration, ozone oxidation. The recycle system will recover somewhere between 50-75% of the wastewater, and backwash from the recycle system would be plumbed back into the interceptor tank inlet for further processing and ultimately release to the City sewer system. The requirement for pretreatment of the carwash effluent before it enters the City sewer system is because it will contain carwash products and chemicals, defined as, "ozone, basic and acidic cleaning compounds, foaming agents, wax, fragrance, colorants, and grit and debris from cars (page 3.0-18).

Several questions (unanswered in the IS/MND) arise:

- 1) What is the evidence that the grading for the carwash drainage will withstand 100-year precipitation events?
- 2) There is no detail about the underground structures that will be constructed here (interceptor tank and recycle system). How deep will these structures be? Of what materials are they composed? The IS/MND does not tell us, but Appendix A states that the interceptor tanks will be concrete, and concrete

can crack and leak. Although the IS/MND states that the interceptor tank "would be watertight and leak-tested after system connections are complete" (3.0-18), there is no mechanism for monitoring the on-going integrity of the tank. No testing or monitoring of the recycle system (presumably also underground) is proposed. How will the ongoing integrity of these structures be monitored and verified so the underlying groundwater will not become contaminated? This is important because contaminated water that could potentially infiltrate into the ground would likely end up in the North Cold Creek and/or Big Springs drainage.

3) How will carwash wastewater components/chemicals be removed from the effluent released to the City sewer given that the backwash from the recycle system ultimately goes into the City sewer? The carwash cleaning products, identified as "pre-soak rinses, foaming soaps, tire and wheel cleaners, conditioners, drying agents, coating/sealing waxes, and rain protectants" (4.0-39) contain a variety of hazardous materials (as admitted in the IS/MND). A quick check on the internet shows that these cleaning products can contain chemicals such as: hydrofluoric acid; sulfuric acid; petroleum distillates; quaternary ammonium compounds; alkylamine ethoxylate; 2-butoxyethanol; sodium hydroxide; sodium dodecylbenzene sulfonate; sulfonic acids, C14-16-alkane hydroxyl and C14-16-alkene, sodium salts; solvent naphtha (petroleum); sodium alpha olefin sulfonate; alcohols, C9-11, ethoxylated; fragrance; nonylphenoxypolyethylene-oxyethanol; sodium xylene sulfonate; disodium trioxosilicate; sodium hydroxide; "proprietary surfactants"; etc.. The safety data sheets for many of these components indicate a "single word" safety identifier of "Danger" or "Warning." Some of these chemicals can react with other components in the waste stream. For example, hydrofluoric acid readily reacts with organics and thereby can create toxic chemicals. However, the IS/MND does not tell us which of these potential compounds will be used.

The interceptor tanks remove sediments and oil/grease (no details of how these are removed from the underground tanks). However, the carwash acidic and basic cleaning agents (detergents) in the waste stream would likely create colloidal suspensions with grease/oils/waxes and other chemicals (that is why detergents work) that may not be removed by sedimentation or floatation. Moreover, many of these chemicals are water soluble and would become concentrated by the return of backwash from the recycle system to the interceptor tank. Yet the only monitoring of the effluent constituents is for copper and zinc (Appendix A, Table 3). What is the evidence that the chemicals used in the carwash will either be removed by the interceptor tank or will not result in problems at the City WWTP?

4) The recycle system will recover somewhere between 50-75% of the wastewater. Given the severity of water issues in the state, the carwash should be required to maximize use of the recycle system to the indicated potential of 75%. However, there is no indication that the percentage use of reclaimed water will be monitored. (See also below, comments on Appendix A).

5) The solids and sludge that are removed by the wastewater pretreatment system will be dewatered and disposed of at a landfill as non-hazardous waste (page 3.0-18). How will dewatering be done? Nowhere in the project description is there any mention of a dewatering system. The IS/MND states, "However, testing to determine whether special disposal [of the solids and sludge] is necessary is a requirement of

the industrial waste discharge permit" (page 3.0-18, last paragraph). I see no statement in the sewer permit (Appendix B) that explicitly states the City will be monitoring the solids and sludge to be removed from the site and there is no described reporting mechanism. It is not clear that this will actually be monitored by anyone.

See also comments below on Appendix A

Storm drainage: page 3.0-26: There is no final storm drainage plan. Figure 3.0-12 shows one proposed option, the document then states, "This is a preliminary plan, which has been reviewed by the City, and is at a sufficient level of detail and appropriate at this stage of the project application process." It is nice that the preliminary plan has been reviewed by the City, but that does not mean the public has adequate information to evaluate the environmental impacts. The Project Description then goes on to propose other alternatives with little detail of how those would be implemented and what criteria would be used to choose a final plan. This level of uncertainty is not adequate to allow the public and relevant agencies to review the environmental impacts of the project.

This is particularly important because the area of the project was historically a source for waters in the North Fork of Cold Creek and ultimately the Sacramento River. As stated on page 4.0-73, the City's "surface storm drainage features consist of natural waterways, man-made ditches, and/or remnants of natural watercourses." These features all ultimately lead to Lake Siskiyou and the Sacramento River. The "roadside ditch" along the southern perimeter of the project site that turns north along Mt Shasta Blvd, and that is maintained by the City for storm drainage (page 4.0-73), is a remnant of the North Fork of Cold Creek. Thus the City's storm water drainage system at the project site is a tributary to the Sacramento River (this is not pointed out in the IS/MND). Any contaminated storm water that escapes the project site, or is not properly pretreated, could have significant negative impacts anywhere along the waterways. The project description does not tell us how much water the storm water system can hold, how it compares with 100-year precipitation events, and given that 100-year precipitation events are happening more frequently and storms are becoming more severe, how the system will hold up over the next several decades with global warming impacts.

In addition, any water from the site that infiltrates into the ground (from landscaped areas or the "underground infiltration chamber system" (page 4.0-47)) will end up in the Big Springs Creek drainage. Evidence for this claim is that, according to Crystal Geysers Water Company, water from the well just a few feet north of the project site (Dex-1) is hydrologically connected to Big Springs (see the EIR for the CGWC project). Thus ANY water that leaves the project site, whether it is surface run-off through the storm drainage system or infiltration into the ground, must be pretreated to ensure water quality.

With regard to required water quality standards, the IS/MND says, "Big Springs Creek is not designated by the state as impaired and is not subject to regulated Total Daily Maximum Loads (TMDLs) for known contaminants..." (4.0-44), implying there is no mandate to protect these waters (or those of North Cold Creek) from further pollution. Let me point out that the State of California has an anti-degradation policy for surface and groundwaters of the state ("Statement of Policy with Respect to Maintaining High Quality of Waters in California", Resolution # 68-16;

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1968/rs68_016.pdf). This policy mandates the maintenance of the quality of existing high-quality water, such as those found in our area. Given that the storm water from the proposed project will ultimately end up in the Sacramento River watershed, and likely in the underlying groundwater, it is imperative that the storm water pretreatment system be effective in maintaining the high-quality waters of this area.

Like the pretreatment system for the carwash wastewater, the pretreatment system for storm water appears to remove only sediments and grease/oil. What about the water soluble contaminants that may be in the run-off or infiltrate, such as pesticides (used for landscaping, rodent control, insect control, etc.) and the multitude of things that might be dumped out of people's cars as they are cleaning them and disposed inappropriately by storage bin renters (also see comments above in Section 4.9, Hazards and Hazardous Waste, second paragraph). A thorough monitoring and reporting system for the water released from the project's storm drainage system is needed to ensure protection of Mt. Shasta's high quality waters.

4.14. Noise

Dryer Noise: Mt. Shasta Municipal Code 18.70.080 (E) gives a clear mandate to mitigate noise (Page 3.0-16, first paragraph): "Mechanical equipment shall be screened to mitigate noise and views from all sides..." In the discussion of noise generated by the carwash dryers (page 4.0-57), according to the specifications from the manufacturer, the dryer WILL create noise at the nearest residence that WILL exceed the City's standards, yet the IS/MND does NOT clearly include design features to effectively reduce that noise. Although possible modifications to reduce noise are suggested in the mitigations (MM NOI-2), the appropriate ones need to be analyzed for their effectiveness and specified to achieve a quantifiable degree of noise level reduction. That information must be included in the IS/MND.

Mitigation Measure MM-NOI-1: page 4.0-60: the last sentence of MM NOI-1: "When not in use, motorized construction equipment shall not be left idling for less than five minutes." Is this a demonstration of the author's lack of attention to detail or a Freudian slip? I believe it should say the equipment "shall not be left idling for **more** than five minutes."

4.17. Transportation

Ski Village Drive is a poorly planned street. The intersection with Road Number 2M16, where the "zigzag" is located, is a dangerous intersection. Putting public access driveways on Ski Village Drive and Road Number 2M16, as proposed, will mean even more dangerous car movements along that street and through the intersection. The actual street itself should be redesigned and the "zigzag" removed before any commercial activity is allowed there. Although calculations based on ITE trip generation methodology and Abrams Associates 2016, with their many assumptions and approximations, may indicate there is not a traffic problem at this intersection, such estimates are no substitute for the actual

experience of traversing that intersection, be it by car, bicycle, or on foot; many local folks will attest to the hazardous driving in this area.

The carwash trip generation (50 trips per day) is based on the estimate by the applicant's engineer for the purpose of estimating wastewater flows for the industrial waste discharge permit (page 4.-66, footnote 4). Is this just an assumption or guess? What data substantiates the estimate of the frequency of carwash use? The value of this parameter has implications for transportation, hydrology, air quality and green house gas emissions. What is the evidence that supports the use of 50 trips per day for the carwash?

4.18. Tribal Cultural Resources

See General Comments, AB 52, above.

4.19. Utilities and Service Systems

Page 4.0-73; Solid waste: There is no discussion about recycling of garbage left by carwash users. The facility should provide recycle collection bins so as carwash users are cleaning out their cars recyclable components like plastic, glass, and metal beverage containers can be recycled. Moreover, the containers that the carwash cleaning and waxing solutions come in are likely recyclable, and a plan for recycling these containers must be included.

Page 4.0-73: Regarding solid waste: John Smith Sanitation no longer services this area. There have been many problems with the new service provider. Perhaps those issues need to be acknowledged here.

Also see comments above in section 4.10, Hydrology and Water Quality

4.20. Wildfire

See comment above under ***4.9. Hazards and Hazardous Materials***

4.21 Mandatory Findings of Significance

Because of the many problems with the project outlined above, the Mandatory Findings of Significance are invalid. There certainly will be significant cumulative negative impacts of the project from noise, air pollution, light pollution, and aesthetics. The study ignores the impacts of the proposed CGWC project. It ignores the historical context of a property owner who illegally altered the property before the initial study could be done. This project does not belong in the proposed location.

Appendix A: Draft Sewer permit

Although Table 2 lists 15 parameters that must not exceed effluent limitations, required monitoring is for only three parameters: flow, copper, and zinc. (table 3 of appendix A). How will the applicant and the City know if effluent limitations for other parameters are being exceeded? Surely, since acidic and basic cleaning compounds will be used in the carwash, monitoring of effluent pH would be important. Since the recycle system will have the effect of concentrating the carwash components, it seems monitoring of additional components in Table 2 would be prudent.

Page 15: The sewer permit bans dilution of the effluent to meet effluent limitations as follows:

"10. Dilution

A permittee must not ever increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable Pretreatment Standard or Requirement. The Public Works Director may impose mass limitations on permittees who are using dilution to meet applicable Pretreatment Standards or Requirements, or in other cases when the imposition of mass limitations is appropriate."

Will the applicant be allowed to use the recycled water to dilute the effluent to meet effluent limitations? The project description says the recycle system can reclaim "up to" 75% of the wash water." The permit says the expectation is that "approximately half" (page 3, paragraph B) of the wash water will be recycled. Will the rate of recycled water use be monitored in any way to ensure optimal use of reclaimed water and compliance with the sewer permit's ban on dilution of the effluent?

Why is the table of contents given twice?

According to the Table of Contents, Figure 1 is supposed to be on page 25 of the permit, however it does not appear until the very end of the document.

Appendix B: CalEEMod Calculations

Appendix B, regarding GHG and air pollution estimates based on the CalEEMod program incorrectly uses Climate Zone 14 for the calculations. Siskiyou County is in Climate Zone 16, with significantly more heating days. The the CalEEMod calculations need to be redone with the correct Climate Zone. There is little information about how the energy use for Operating the facilities was determined, only that there are "User Defined Commercial" inputs. Does this include the traffic trips from customers, employees, deliveries, garbage pick-ups? Does it include the emissions from snow removal equipment; lights, heating/cooling, operation of the carwash stations, dryers, water recycle system, vacuum stations?? We have no way of knowing. This is all information that must be clarified for public review.

Lastly, page 1 gives an incorrect address for City.

We offer these comments with a genuine interest in the development of a healthy local community, economy, and environment.

We would like to have responses to our questions/comments/concerns in writing. Please let us know what the timeline will be for obtaining your response.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Geneva M. Omann', with a long horizontal flourish extending to the right.

Geneva M. Omann, Ph.D. (Biochemistry)
Secretary
for We Advocate Thorough Environmental Review

Attachment A

Photos of destructive tree removal and surface grading of the Project Site, February 26, 2016.







