We Advocate Thorough Environmental Review
P.O. Box 873
Mt. Shasta, CA 96067
mountshastawater@gmail.com

July 27, 2018

City of Weed
Ron Stock, City Manager
550 Main Street
Weed, A 96094

Submitted via email:
stock@ci.weed.ca.us

Dear Mr. Stock:

We Advocate Thorough Environmental Review (W.A.T.E.R.) is a California 501(c)(3) non-profit corporation 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 request for public comment on the Draft Environmental Impact Report (DEIR) for The Love's Travel Stop Project prepared by Ascent Environmental, Inc., June 2018. Please acknowledge receipt of this submission.

We outline below many deficiencies in the DEIR that need to be addressed in the FEIR.

Section 3.1 Aesthetics

Impact 3.1-3: Substantially degrades the existing visual character or quality of the site on its surroundings.

The analysis of this section seems flawed and even deceptive. The photos in Exhibit 3.1-4 (Viewpoint 1) appear to have been taken with a wide-angle lens, which makes the more distant objects look smaller. Thus the photo-shopped version of the photo makes it look like the Truck Stop is small. I have viewed the site from where the photo was taken (and taken my own photos), and it is very clear that the Truck Stop will have a significantly greater negative visual

impact than what is shown in that photo-shopped image. With the exception of one truck, the simulation also leaves out the cars and trucks that will be in the view. Additional studies are required to create an accurate portrayal of the visual impact of the Proposed Project, using photos taken with a lens that captures the perspective common to human vision (e.g., 50 mm focal length for a full frame camera). It is unlikely that such an analysis will yield the conclusion of no significance.

The simulation in Exhibit 3.1-5 (viewpoint 2) contains no vehicles. The view will be dramatically impacted by trucks parked in the foreground, under the high mast light fixture. There will be large trucks obscuring the view. Again, additional studies are required to create an accurate portrayal of the visual impact of the Project. It is unlikely that such an analysis will yield the conclusion of no significance.

The analysis of impact to the unity of the site at (Viewpoint 1) leaves much to be desired.

> " The building and structures of the proposed project do not block the wooded hillside, and in combination with the improvements to Vista Drive they provide a visual foundation for the wooded hillside and increase compositional harmony." (pg 3.1-9)

To say the Truck Stop provides "a visual foundation for the wooded hillside" and "increases compositional harmony" are unsubstantiated statements. By contrast, the trees that would be removed from the project site create a significantly better "visual foundation for the wooded hillside," and provide dramatically "greater compositional harmony," than the proposed project.

The analysis of the view from Viewpoint 2 states:

> "Unity remains moderately high: although the proposed project is almost completely visible, just one high-mast light fixture encroaches into the skyline and the removal of visually dominant trees allows for the focal point to be Mount Shasta, maintaining compositional harmony."

The conclusion that the Truck Stop will not be the focal point of the view is unsubstantiated. The 17 acre Truck stop is "almost completely visible" in the view and will most certainly be the focal point of the view.

Thus the conclusions of Impact 3.1-3, that there will be no significant impact to the "existing visual character or quality of the site on its surroundings," is unsubstantiated and, quite frankly, ridiculous.

The analysis ignores potential mitigations that could help reduce the visual impact of the site, like planting trees and shrubs along Vista Drive, Mountain View Drive, and Sugar Pine Road (the private road along the west side of the project). Although it is not clear that such mitigations would significantly reduce the visual impact, a full analysis should be completed for the FEIR.

Location of the Project on the east side of I-5, where there is already development, would be a far better option; there the visual impacts would be compared to already existing development.

Section 3.2 Forestry--see Section 3.4 Biological Resources

Section 3.3 Air Quality

The air quality analysis is very deficient. There is no analysis of ambient levels of pollutants existing at this location and likewise no attempt to analyze the probable cumulative levels of pollutants associated with this project. The DEIR merely states that air quality measurements taken in Yreka did not exceed state or national regulatory standards. Temperature inversions that can trap air pollutants are common in this county and especially in Shasta Valley and surroundings.. The I-5 freeway, with 23,300 vehicles trips per day (page 3.3-15) must be considered. The air pollution that drifts over from the east side of I-5 where there are several gas stations, a truck stop, and commercial businesses, all add to the ambient levels of pollutants. The cumulative impacts of all of these sources, along with project generated air pollution and the estimated 5,124 vehicle trips per day (page 3.3-15), and consideration of local temperature inversion must be included in the analysis of impacts to sensitive receptors.

We know this is important because in Mt. Shasta City, Crystal Geyser Water Company proposes to be running 150 trucks in and out of the Mt. Shasta plant daily, and modeling of the estimated emissions show this would create a toxic hot spot surpassing the CEQA threshold of significance for maximum individual cancer risk (MICR). One of the locations in Mt. Shasta that would exceed the threshold is over 1,700 feet away from the site! Near Love's proposed Truck Stop there are residences within only 650 feet of the propose project and Love's is estimating 5,124 vehicles a day at the site. A thorough analysis of air quality impacts is certainly warranted.

The lack of an analysis of what would be the cumulative levels of pollutants and a related **health risk assessment** with mapping is a deep flaw in the DEIR. A statement that PM pollution dissipates rapidly is totally insufficient, especially because PM pollution is simultaneously generated rapidly by diesel trucks. Sensors capable of monitoring PM10 and PM2.5 are readily available and can be placed appropriately to determine ambient levels. Such studies need to be done for the FEIR.

The DEIR states:

> "Additionally, trucks that park for the night may use a small on-board generator to power air conditioning/heating for the sleeping quarters and (if needed) for the truck's load. The emissions from this are minor compared to overall project emissions, and are not considered part of the project because the trucks already pull to the side of the road or find another rest area to spend the night in the area if needed; these emissions already occur and are not generated by the project" (page 3.3-13).

The contribution of these on-board generators must be included as contributions to the projects emissions. To rationalize otherwise by saying these trucks would be running their generators at a different rest area ignores the **local** impact of the emissions that will impact the nearby sensitive receptors. Also, the truck stop will attract more overnight truck stays to the area than would otherwise occur.

The net result of the Air Quality study is that **no attempt** is even being made to reduce the air pollution impacts of the Proposed Project. This is a serious flaw that must be corrected in the FEIR. A program to reduce air pollution impacts must be designed.

See additional comments in the Energy section.

Section 3.4 Biological Resources

Biological Survey and mitigations for habitat loss and special status species:

NOP comments from the California Department of Fish and Wildlife state,

> "The draft EIR should include survey methods, dates, and results; and should list all plant and animal species (with scientific names) detected within the Project study area. Special emphasis should be directed toward describing the status of rare, threatened, and endangered species in all areas potentially affected by the Project. **All necessary biological surveys should be conducted in advance of the draft EIR circulation, and should not be deferred until after Project approval." (bold emphasis added).**

The document indicates (page 3.4-1) that a "reconnaissance-level survey of the project site" was conducted on June 21, 2016 by Ascent Environmental. A description of that survey starts on page 3.4-7. However, it is not clear if this was indeed a thorough study as required by CDFW. Phrases such as "other common shrubs, forbs and grasses in this habitat type include..." make it unclear as to whether a full inventory of plant species were assessed. In addition, at least two of the special status species of plants identified from data bases (Table 3.3-4) would not likely be blooming in June, thus an additional survey date should have been included in the DEIR to meet CDFW requirements.

Also of concern, is that 5.6 acres of bitterbrush habitat, considered a sensitive natural community, has already been identified on the site, but there is no plan put forth in the DEIR to mitigate this known issues.

> "Bitterbrush habitat on the project site is considered to be a sensitive natural community, with a state rank of S3 and a global rank of G4 (CDFW 2010). A state rank of S3 means that the habitat is rare and considered of special concern; likely due to a restricted range in California. Bitterbrush is primarily a Great Basin species and California has a limited area of overlap with the Great Basin; largely in Siskiyou, Modoc, and Lassen Counties in the northern portion of the state. A global rank of G4 indicates that the habitat is uncommon globally but not rare, and that there is some cause for long-term concern due to declines or other factors." (page 3.4-16).

Thus Mitigation Measures 3.4-1 seems incomplete and must clearly state that "protocol level surveys" for special status species shall be conducted before beginning construction and during the blooming season for each plant.--this is not a option.

If special status species are identified, the mitigation simply says they will consult with CDFW to set up mitigation plans that will result in no net loss of habitat or species. Since it is already known that 5.6 acres of bitterbrush habitat must be mitigated, the FEIR must include a complete mitigation plan. Since it is clear that virtually all of the 17.6 acres of the project will be disturbed/significantly altered, it appears that off-site relocation of habitat/species will be the only option. There is no indication that the applicant has access to suitable habitat/species relocation sites. Moreover relocation of native plants is not an easy thing to do. There needs to be a much more concrete plan for handling the loss of sensitive habitat and special status species that ensures this mitigation measure is feasible.

Domestic Animals:

There is no discussion in the DEIR about pets brought on site by travelers. Many truck drivers, as well as other motorists, travel with pets. There is no analysis of how much impact this could have. There is no 'Pet Area" designated in the project's plans. Thus pet waste would simply accumulate on site and end up in the retention ponds after precipitation events, or pet owners would take their pets off-site, where again animal waste could eventually end up in local water run-off. Unmanaged feces from pets could pose a threat to other motorists as well as to wildlife and the wetland area to the west (into which the retention ponds will drain via the "agricultural ditch") or in ground water under the site (where retention ponds would drain).
The project needs a clearly defined "Pet Area" that will ensure proper disposal of pet waste (feces) so it is not a threat to other travelers and local wildlife and water resources. The FEIR needs a thorough analysis of this issue.

Trees:

The project will remove 145 mature trees, and City of Weed ordinances require replacement. Since it appears al 17.6 acres of the site will be disturbed/developed and unsuitable for trees, and such trees would have to be planted off-site, there needs to be a replacement plan for these trees so the public and relevant agencies can evaluate the environmental implications of that off-site impact.

Section 3.6 Energy

The analysis of impacts from energy use during construction is woefully inadequate: Although the analysis shows over 150,000 gallons of diesel fuel and over 250,000 gallons of gasoline will be need for construction, there is no discussion of how efforts will be made to reduce energy use. The analysis simply says:

> "Construction contractors strive to complete construction projects in an efficient manner to meet project schedules and minimize cost (to maximize their profitability)" (page 3.6-6).

This is no guarantee (or enforce) that energy use will be minimized and no mandate to the applicant to ensure contractors make attempts to do so. For example, the need to meet a project schedule could outweigh the need to increase fuel efficiency and result in wasteful fuel use. A meaningful, enforceable mitigation needs to be put in place to ensure efficient energy use. This also has implications for air quality and green house gas emissions.

Analysis of the remaining energy requirements (operations and transportation) is deferred to the Green House Gas section. It is important to note that reduction in energy use and reduction of GHG are not the same thing, a point to which we will return in the GHG section.

Section 3.7 Geology and Soils

Geology:

The DEIR describes the project site as being in the Great Valley Geomorphic Province:

> "The project area is located near the border of several geomorphic provinces: the Klamath Mountains, the Cascade Range, and the Great Valley. However, the project site is within the Great Valley geomorphic province, a northwest-trending alluvial plain about 50 miles wide and 400 miles long, bound by the Coast Ranges on the west and the Sierra Nevada on the east. It is drained by the Sacramento and San Joaquin Rivers, which join and enter San Francisco Bay" (page 3.7-4).

This description is inconsistent with the fact that the project site is in the Klamath River water shed, as described in the Hydrology section (not the Sacramento River watershed). All definitions that I have found of the Great Valley Geomorphic province link it to the Sacramento River watershed, and at least one map with sufficient detail clearly shows that the project site is not in the Great Valley Geomorphic Province, and instead appears to be in the Klamath or Cascade Geomorphic Provinces.
(https://en.wikipedia.org/wiki/Geography_of_California#/media/File:California_Topography-MEDIUM.png).
The description of the geology of the Great Valley Geomorphic Province, "geologic structures within this Province generally consist of alluvial fan, terrace, and floodplain geomorphologies" (p3.7-4) is very different from the description of the local geology,
"The geologic units underlying the site consist of pyroclastic volcanic rocks (Qv pb) (Wagner and Saucedo 1987). The volcanic materials are late Quaternary in age (formed between 2.6 million years ago and present) and consist of Andesitic and Dioritic pyroclastic rocks associated with the Black Butte eruption".
This would appear to be a significant error in the DEIR. Please explain/correct this inconsistency in the FEIR.

Soils:

The soils described as being on the site (Deetz gravelly loamy sand, 0 to 5 percent slopes and Neer-Ponto complex, 15 to 50 percent slopes) are listed as "deep, somewhat excessively drained" and "deep and well drained" soils. This has implications for the safety of the proposed retention ponds and will be addressed in the Hydrology section.

3.8 Greenhouse Gas Emissions and Climate Change

This section, as does the Air Quality section, relies heavily on studies reported in Appendix B (the text incorrectly directs the reader to Appendix C). Appendix B is a lengthy document with endless tables of calculated results, comparing estimated emissions (air pollutants as well as carbon dioxide). It is very perplexing to this reader that for many comparisons, the "mitigated" calculations are the same as the "unmitigated" calculations. For example, the following tables for missions from overall operations show no reduction of emissions with mitigations.

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	6-1-2018	8-31-2018	1.2603	1.2603
2	9-1-2018	11-30-2018	1.0379	1.0379
3	12-1-2018	2-28-2019	0.9665	0.9665
4	3-1-2019	5-31-2019	0.9449	0.9449
5	6-1-2019	8-31-2019	0.5065	0.5065
		Highest	1.2603	1.2603

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1266	4.0000e-005	3.8100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.3600e-003	7.3600e-003	2.0000e-005	0.0000	7.8500e-003
Energy	3.1800e-003	0.0289	0.0243	1.7000e-004		2.2000e-003	2.2000e-003		2.2000e-003	2.2000e-003	0.0000	261.8305	261.8305	4.6400e-003	1.4100e-003	262.3671
Mobile	4.3452	34.6513	33.1000	0.0847	2.7005	0.0933	2.7939	0.7277	0.0883	0.8160	0.0000	7,883.3074	7,883.3074	1.0257	0.0000	7,908.9500
Waste						0.0000	0.0000		0.0000	0.0000	22.4041	0.0000	22.4041	1.3241	0.0000	55.5052
Water						0.0000	0.0000		0.0000	0.0000	1.5054	21.9254	23.4308	0.1550	3.7300e-003	28.4174
Total	**4.4750**	**34.6802**	**33.1281**	**0.0849**	**2.7005**	**0.0956**	**2.7961**	**0.7277**	**0.0905**	**0.8182**	**23.9095**	**8,167.0707**	**8,190.9802**	**2.5094**	**5.1400e-003**	**8,255.2475**

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1266	4.0000e-005	3.8100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.3600e-003	7.3600e-003	2.0000e-005	0.0000	7.8500e-003
Energy	3.1800e-003	0.0289	0.0243	1.7000e-004		2.2000e-003	2.2000e-003		2.2000e-003	2.2000e-003	0.0000	261.8305	261.8305	4.6400e-003	1.4100e-003	262.3671
Mobile	4.3452	34.6513	33.1000	0.0847	2.7005	0.0933	2.7939	0.7277	0.0883	0.8160	0.0000	7,883.3074	7,883.3074	1.0257	0.0000	7,908.9500
Waste						0.0000	0.0000		0.0000	0.0000	22.4041	0.0000	22.4041	1.3241	0.0000	55.5052
Water						0.0000	0.0000		0.0000	0.0000	1.5054	21.9254	23.4308	0.1550	3.7300e-003	28.4174
Total	**4.4750**	**34.6802**	**33.1281**	**0.0849**	**2.7005**	**0.0956**	**2.7961**	**0.7277**	**0.0905**	**0.8182**	**23.9095**	**8,167.0707**	**8,190.9802**	**2.5094**	**5.1400e-003**	**8,255.2475**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Appendix B, pdf page 5

It appears that the calculations simply verify that no effort was done to reduce emissions (air pollutants or CO_2) and therefore any conclusion about the effectiveness of mitigations cannot be substantiated.

This undermines Mitigation Measure 3.8-1: Reduce and Fully Offset GHG Emissions: although this mitigation measure suggests possible ways the GHG could be locally offset, there is no mandate to do so. Rather, locally reducing GHG emissions appears to be an option, and further GHG reduction relies on off-site approaches:

> "Offsets may include, but are not limited to, the following: use of emissions credits provided by Love's GHG Mitigation Bank Offset Program, retrofitting buildings and other facilities in the community, and/or purchase of offsets" (p 3.8-15).

Because GHG effects tend to be global, not local, this may be okay for GHG emissions, but air quality issues are **local**, and thus these strategies for off-site GHG reduction do not apply to other air pollutants. Thus appropriate air pollution mitigations, separate from GHG mitigations, must be employed addressed in the Air Quality section.

For Love's to apply their GHG Mitigation Bank Offset Program to the Weed project, there must be a verifiable way to ensure the offset dedicated for the Weed project are not also used to offset other projects, i.e., the offsets must be unique to one project only, and the City must be able to verify this, in perpetuity.

3.10 Hydrology and Water Quality

The Project Site will contain bioretention ponds to collect stormwater run-off from the 17.6 acre project site. What happens next is not clear. There are many issues that need to be clarified in the FEIR to ensure these ponds will not lead to contamination of ground and/or surface waters. On the one hand, it is stated that the ponds will promote infiltration and promote groundwater recharge. There is the claim that the bioretention ponds can remove pollutants, including heavy metals, from the run-off. On the other hand, it is stated that the ponds will be connected to an "agricultural ditch" west of the project site that drains into Boles Creek and ultimately the Shasta River.

There are many unanswered questions about this system.

1) Run-off from the site will not be clean water. Pavement residue, hydrocarbons from leaky vehicles, and other debris from traffic at the site have the potential to travel through the ponds. There needs to be an analysis of the chemical constituents in the run-off water to inform construction of the bioretention ponds.

2) In order for pollutants to be removed from the run-off, the bioretention ponds need to have an appropriate medium that will support the growth of organisms that will metabolize/sequester the pollutants. The Geology and Soils section states that the soils under the project site are excessively and well drained, thus the native soils will not have any pollutant filtering/sequestering capacity. What kind of medium will be employed in these ponds? How will the quality of the water that is infiltrating into the ground or released to the ditch be evaluated?

3). What will determine the fate of the retained water-either into the drainage ditch (surface waters) or into the ground water below?

Whereas the DEIR cites a study by Ahiablame et al, describing the benefits of bioretention ponds, that paper also describes potential challenges that must be addressed (such as those above) for the ponds to be effective.

The studies of proposed Mitigation Measures 3.10-3a and 3.10-3b would address most of these questions, but they must be completed **before release of the FEIR in order to provide full disclosure to the public.** Without this information, the public and decision making bodies will not have adequate information to make informed comments and decisions. The FEIR must have detailed information about the design of the ponds and monitoring protocols to ensure protection of the Boles Creek watershed and underlying groundwater.

Section 3.12 Noise

The noise assessment relies heavily on Appendix D, which is largely unintelligible and may be greatly improved by the source listed as " Data modeled by Ascent Environmental in 2017 " in the tables, but not made available to the public.

The analysis of this section isolates out each of 3 different sources of noise related to the ongoing operations of the Truck Stop relative to the residence at 650 feet:

Impact 3.12-2: Exposure of existing sensitive receptors to excessive traffic noise levels
Impact 3.12-3: Intermittent single-event noise levels from trucks
Impact 3.12-4: Long-term operational non-transportation noise levels

The study concludes that no one of these exceeds the County's threshold for exterior noise (60 dB) at the 650 foot receptor. However, these sources will be occurring at the same time, and we see no summation of all these different sources; such an analysis must be done for the FEIR.

This section concludes by addressing interior noise at sensitive receptors due to the operational stationary noise sources:

> "The Siskiyou County General Plan Noise Element contains the land use compatibility standard for residential exterior community noise of 60 L_{dn}. Applying the modeled operational stationary source noise levels of 50 L_{eq} during each hour of the day to account for the 24-hour operation of the proposed project, the nearest sensitive receptors would be exposed to an exterior L_{dn} of approximately 57 dB during operational (non-transportation) activities. The modeling conservatively assumes that the noise levels generated by the on-site non-transportation operations detailed above would occur continuously throughout the entirety of the day and night. Additionally, based on the modeled operational, non-transportation noise level of 57 L_{dn} and the average exterior-to-interior noise level reduction of 24 dB typically provided by residential buildings with the windows closed (EPA 1978: 11), the interior noise levels at the nearest surrounding residences would not exceed 33 L_{dn}, well below the recommended interior noise level of 45 L_{dn}. (page 3.12-16)."

Here again, we see no summation of the multiple sources of on-going noise, only the operational stationary source is addressed. We also see that the calculation for interior noise includes a 24 dB reduction for windows being closed. The authors of this study are clearly unaware that people in this area do not routinely keep their windows closed. Without the artificial subtraction of 24 dB from the external noise estimate (57dB) the noise level inside a house with windows open could very likely exceed the standard of 45 dB L_{dn}. A calculation of noise exposure at the sensitive receptor must model open windows!

3.13 Public Services and Recreation

Parks are inappropriately not evaluated in this DEIR. There needs be an analysis of the impacts to the nearby open spaces to the west, for which the City has plans for park development (Botanical Gardens).

Enforcement of the 5 minute truck idling rule needs to be described. The DEIR states that there will be no impact of the project to the Police department because CEQA requires that such an analysis is required if additional construction of Police facilities will be required. This is not the relevant issue. The issue is that the environmental impacts of the Project will be directly dependent upon enforcement of the 5 minute idling rule. If the Weed Police Department will not be providing enforcement, who will? There is already routine violation of the 5 minute idling rule on the east side of I-5 with significant deterioration of air quality in the evenings--the Weed Police Department does not appear to have the resources to enforce the rule there. Clearly there

is the need for assurances that the 5 minute rule will be enforced (either by the Weed PD or other clearly defined feasible means).

Section 14 Transportation

The appendix for this section (E) is used as a basis not only for transportation impacts but also for air quality and green house gas analyses. How the data from Appendix E is input into Appendix B is completely opaque and leaves the reader, whether a concerned community member or a decision-making authority, uninformed. The FEIR must include significant disclosure of how the traffic information is utilized in Appendix B.

Section 15 Utilities and Service Systems

Waste water:

The paragraph titled "Impact 3.15-1: Impacts on wastewater infrastructure" (page 3.15-8) states:

> "Although the recently-adopted 2040 General Plan includes policies to expand wastewater treatment capacity, the proposed project could move through City permitting before these policies are fully implemented. Therefore, the potential for implementation of the proposed project to increase wastewater such that the capacity of the infrastructure or treatment facility could be exceeded would be potentially significant."

Thus it is not clear if the City's waste water treatment facilities can handle the project.
Proposed Mitigation Measure 3.15-1 does not address the possibility that the City could not handle Love's wastewater. It says:

> "Prior to approval of building permits, the project applicant shall provide confirmation from the City of Weed demonstrating that there is adequate capacity for PWWFs and that the wastewater infrastructure system and treatment facility have sufficient capacity to accommodate project flows."

But what if the City cannot provide that capacity? This possibility needs to be fully addressed in the FEIR, with full consideration of all of the environmental impacts of an alternative wastewater treatment system.
The estimate 11,300 gpd of wastewater is based on estimated potable water use. It needs to also consider the volume and composition (e.g. sanitizing chemicals) that will be dumped into the "Dumping Station" indicated in Exhibit 2-3. These wastewaters volumes could be significant and commonly used sanitizing chemicals could be harmful to the wastewater treatment facilities. These issues need to be addressed in the FEIR.

Solid Waste:

With respect to solid waste, the analysis is based solely on solid waste produced per employee. The estimates for solid waste must also include solid waste deposited by travelers/truck drivers and linked to traffic volume through the Truck Stop.

The project needs a recycle program. Travelers through the station are likely to deposit recyclable beverage containers and other waste, the fast food outlets will likely generate a large amount of recyclable packaging and beverage containers. These could easily be collected and delivered to a recycle center.

Section 5 Alternatives

As summarized in Table 5.1 (and as is almost always the case), the "No Project" alternative would have the least environmental impact. The second least impactful alternative would be the Existing Entitlement option, a significantly smaller gas station with a smaller footprint on the project site.

Table 5.1 indicates that Alternative 3 (locating the Truck Stop in the east side of the freeway, would be less desirable than the proposed project. However, Table 5.1 seems to misrepresent the analysis in the text, which clearly states that placement of the Project on the east side of I-5 would have less impact for sensitive receptors on the west side of the freeway. The statement that cultural and tribal resources could be impacted by east side placement is not substantiated. The assessment says traffic impacts would be greater on the east side, but the east side has already been developed (using Federal EDA funds) to handle such projects. Moreover when the many inadequacies of the DEIR are corrected, we believe it will be clear that the negative impacts of the Proposed Project will be much greater than described in the DEIR.
Thus we agree, in terms of environmental impacts, the order of preference for alternatives is No Project (Alternative 1); Existing entitlement (Alternative 2); a Truck Stop on the East side of the freeway (Alternative 3). The proposed project on the west side need not be considered.

We offer these comments with a genuine interest in the development of a healthy local community, economy, and environment. We look forward to reviewing a much improved FEIR..

Respectfully Submitted by

Geneva M. Omann, Ph.D. (Biochemistry)
Board of Directors, We Advocate Thorough Environmental Review