

## DOCKETED

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<b>Project Title:</b>	Hydrogen Energy Center Application for Certification Amendment
<b>TN #:</b>	201573
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*Comment Received From: Jerry Ezell*

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**City of Wasco Conditional Use Permit 489-87**

*Additional submitted attachment is included below.*

# *Shafter~Wasco Irrigation District*

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January 10, 2014

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Reference: Amendment to Conditional Use Permit 489-87

Dear Mr. Mobley:

The Shafter-Wasco Irrigation District (SWID) wishes to submit comments to the City of Wasco concerning the expansion of the Savage Coal Depot operation through an amendment to CUP #489-87. This expansion from the current level of less than 200,000 tons annually to the proposed level of 1.5 million tons annually is being done to facilitate the delivery of coal to the Hydrogen Energy California project in the Buttonwillow, CA area.

Even though the California Energy Commission is the final permitting authority for the HECA project, the City of Wasco has a duty to solicit public comment on this proposal and to analyze the potential impacts to the residents of Wasco and to the surrounding area. The proposed increase in coal handling and trucking by Savage represents a significant change from the current status at the facility. We recommend that a thorough Environmental Impact Report be prepared reflecting the new conditions before this amendment is approved.

SWID has many concerns with the project in general. The additional air pollution from HECA (over 500 tons) is significant and not easily absorbed by a region already impacted with serious pollution levels well above federal standards for good health. The proposed use by HECA of over 7,500 acre-feet annually of usable irrigation water in a region of severe groundwater overdraft is also of concern.

Our immediate concern; which, the City of Wasco needs to address, are the 150 daily truckloads of coal that will potentially pass by our office at the intersection of Kimberlina Road and Hwy 43. If these coal trucks are to take Wasco Way south and turn right at Kimberlina Road and then left onto Highway 43, there will be severe impacts to traffic at the Highway 43 intersection.

Currently, when a truck or car traveling west on Kimberlina Road attempts to make a left turn onto Hwy 43 all traffic behind this truck or car must wait until vehicles traveling east on Kimberlina Road have cleared the intersection. Currently, there are several times during the day when traffic backs up eastward from this intersection to the point where SWID related traffic cannot exit the SWID facility onto Kimberlina Road in either direction. Traffic often is backed up to the railroad crossing as well which presents a danger if a train is passing through the area.

When a large truck and trailer is waiting to make this left turn onto Hwy 43, there is often no opportunity for other vehicles to safely and legally pass through the intersection headed west during a particular light change sequence.

The issue described above will directly affect SWID. The City of Wasco has the authority to put conditions on the operation of the Savage Coal facility which would mitigate our concerns. One such condition would be the forbidding of coal trucks to use Wasco Way to leave the facility heading south. Instead, the current approved route for coal trucks leaving and entering the facility on J Street should be maintained.

The original HECA proposal specified a truck route for the coal trucks using J Street to Hwy 46 and west to I-5. We feel this would be a more appropriate route than the current proposal. We also understand that the City of Shafter and Rio Bravo School District also object strongly to allowing the coal trucks to use any route that passes along Hwy 43 through their respective areas.

Finally, the City of Wasco has the duty to update completely the Environmental Impact Report originally issued for Savage Coal in 1987. The amount of coal is changing significantly from 900,000 tons to 1.5 million tons. This will increase, from the current situation, the number of trains, the number of trucks, the amount of coal dust and other pollution related to the facility, the amount of coal spillage along the tracks, the local noise and vibration levels, the periodic blocking of the Poso Street railroad crossing, the speed with which the coal cars will be unloaded, the potential for coal heating and fires, the type of coal being imported, and the impacts to pedestrians crossing the railroad tracks (both legally and illegally).

SWID recommends that a decision not be made on January 13, 2014 and that more time be taken by the City of Wasco to receive more public comments and to study more thoroughly the proposed changes to the CUP and their impacts to the City of Wasco and to the surrounding area.

Sincerely,



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Jerry Ezell

General Manager