

(To be read at the Carson City Consolidated Municipality Planning Commission meeting on September 29, 2021)

My name is Maxine Bradshaw. For the record at the end I am submitting copies of my comments for each of the following Commissioners - Jay Wiggins, Nathaniel Killgore, Richard Perry, Sena Loyd, Teri Preston, Charles Borders Jr, Paul Esswein

I am speaking on Agenda Item 13.E - Slaughterhouse, special use permit request. To be clear, I understand the need to have an industry that processes the very food that we eat to sustain life. I don't believe that is being challenged. What is being challenged and of the greatest concern is environmental pollution. Every family in every community regardless of population or geographics, wants to feel assured that they are not living in a health compromised environment. The factual information provided to you now comes from the Environmental Integrity Project (EIP)

The link provided states "the EIP examined Environmental Protection Agency enforcement and compliance data from January 2016 through June 2018 for 98 large meat processing plants". Below are some of the items listed under 'KEY FINDINGS'.

1. **Most of the meatpacking plants in our study release large amounts of pollution.** Of the 98 reviewed the average discharge was 331 pounds of total nitrogen **per day** in 2017, almost the equivalent of raw, untreated sewage from a town of 14,000 people.²
2. **Three quarters (74) of the plants violated at least one of the pollution limits in their federal Clean Water Act permits at least once between January 2016 and June 2018.**³
3. **One third (32) of the plants had 10 or more violations between the above same time period.**
4. **Large pollution loads and frequent permit violations are impairing streams and rivers.** Fifty-nine of the 98 plants discharge

to waterways that are impaired by one or more pollutants found in slaughterhouse wastewater.

At least 66 of the 98 plants surveyed are owned by companies that each reported more than \$2 billion in annual revenues in 2017. Twenty-seven belong to the Tyson's Corporation, the nation's biggest meat producer with more than \$41 billion in annual sales in 2017. Second, JBS Holdings, realized nearly \$34 billion in revenue last year and owns 12 of the plants studied.

In considering these astonishing statistics of massive pollution practices, I urgently request that this special use permit be denied. Please read the entire EIP Report and act accordingly to protect the people of our community and please, Follow The Money. Thank you.

https://www.environmentalintegrity.org/wp-content/uploads/2018/10/Slaughterhouse_Report_Final.pdf

Mafine Bradshaw

Carson City Planning Commission Public Hearing
September 29, 2021, 5:00 P.M.

ITEM 13E: LU-2021-0308 Special Use Permit for a proposed Slaughterhouse located on Highway 50 East and Detroit Road.

Planning Commission,

Please deny the request from Carson Valley Meats for a Special Use Permit for a proposed Slaughterhouse located on Highway 50 East and Detroit Road (LU-2021-0308).

I am Kathleen Franco Simmons, a resident of Carson City, writing on behalf of myself and my parents, Diane and George Howard, who live on August Drive, 913 feet from the proposed slaughterhouse property.

Approval of the special use permit can only be done by making all seven FINDINGS listed in the staff report and enumerated and substantiated in the public record. Due to severe time constraints of this process, I will focus my comments on two Findings in this written communication.

FINDING 2: The staff report states: *"The project will not be detrimental to the use, peaceful enjoyment, economic value, or development of surrounding properties of the general neighborhood; and will cause no objectionable noise, vibrations, fumes, odors, dust, glare or physical activity."*

My response: You cannot make Finding 2. The project **WILL** be detrimental to the use, peaceful enjoyment, economic value, of development of surrounding properties of the general neighborhood; and **WILL CAUSE** objectionable noise, vibrations, fumes, odors, dust, glare or physical activity.

My parents have lived at 4990 August Drive for 60 years. I was born and raised in Carson City, and I and my siblings grew up at this residence, in this neighborhood. My father was born in Carson City; my grandfather was born in Empire City, which was located in part, where the currently proposed slaughterhouse property is located (see ATTACHMENT). My great-grandfather was born at Brunswick Mill several miles east of the proposed slaughterhouse. My grandfather, great-grandfather, and great-great-grandfather are all buried in Empire Cemetery on the hill, 400 feet southeast of the proposed slaughterhouse property. The cemetery was intended to be the final resting place for continuing generations of my family. We are local, native Nevadans and Carson City residents and property-owners.

USE and PEACEFUL ENJOYMENT: The proposal for a slaughterhouse 913 feet from our family home will substantially change the character of the neighborhood. It will impact the use and peaceful enjoyment of our family home. My parents have developed their one-acre property over the past 60 years into a beautiful park-like atmosphere, with green lawns, mature trees, many rosebushes, flower gardens, a long-time vegetable garden, and several statuary gardens reflecting my parents' love of wildlife of Africa, Asia, North and South America. We have a garden bench in a serene spot on which we can sit out in the cool of the day or evening and enjoy birdwatching, listening to the songbirds and crickets, watching the quail and other small creatures who also enjoy the safe and peaceful setting. Even now in their elder years, my mother continues to hand-water her beloved flowers several days a week herself, as she has done for decades. My father continues to work in his vegetable garden almost daily through the growing season as he has done for most of their 60 years here.

NOISE: A slaughterhouse 913 feet away will disturb the peace and quiet of our family home. It will prevent the peaceful use of our family home with the activities of delivery, unloading, and holding livestock for a minimum of two days a week, and more when there are fairs and special events. The staff report is incorrect where it claims this activity will only be done one day a week. The Carson Valley Meats application clearly states that livestock will be delivered over the course of two days; generally half the day preceding slaughter and half on the day of slaughter. The delivery of cows, pigs, sheep, goats and other livestock 913 feet away into an open-air corral 1/8 acre in size will be a noisy endeavor running from 6 a.m. to 6 p.m. The application and staff report do not mitigate the sounds of the delivery of livestock, many of which will be terrified and in distressed. The application and staff report do not mitigate the sounds of livestock held for 24 hours including overnight in open-air corrals 1/8 acre in size. The application and staff report do not mitigate the sounds of livestock being herded into the slaughterhouse through open-air chutes, nor the voices and sounds of the employees herding them. I contend that we will hear these sounds from our family home and property 913 feet away.

The staff report states: *"The project site is located in an industrial area with vacant industrial properties to the north, and east, warehouse uses to the east and south. The nearest residence is approximately 900 feet west of the project site with additional homes being located as close as approximately ¼ mile to the northwest, across Hwy 50 E."* The application states: *"Animals will be in the outdoor corral area for 24 hours +/- each week (the day before harvesting) with an average time on site being less than or equal to 24 hours. All harvesting and processing activities will be inside the facility, thus containing any associated noises to the confines of the building."*

My response: The staff report is inaccurate/incorrect. My parent's house and property are 913 feet from the proposed slaughterhouse property, a measurement I received from the Planning Division. This is .17 mile, or 1/5 of a mile, not ¼ mile as stated in the staff report. Other homes in the neighborhood are even closer to the proposed slaughterhouse. The staff report and the application fail to mitigate the NOISE, or sounds of livestock delivery, unloading, holding in open-air corrals, and herding through chutes to slaughter. Additionally, there will be an impact to neighboring property-owners by the sounds of the tractor shoveling manure and waste into a truck for hauling off-site.

The staff report neglects to include the close proximity of Empire Cemetery to the proposed slaughterhouse property. The cemetery is approximately 400 feet to the southeast of the proposed slaughterhouse property. The application and staff report neglects to provide any mitigations to noise that will be experienced by visitors to the cemetery.

ODORS: The staff report states: *"Odors will be controlled with manure and waste material being removed from the corral area weekly, within 24 hours of harvesting. Unusable portions of the animals will be sprayed with denature to eliminate the potential for odors and removed from the site on the day of the harvest and properly handled by a rendering company. After harvesting the animals, all meat will be stored in the on-site freezer to remove the potential odor from spoiling."* The application states: *"Manure and waste will be cleaned from the corral area weekly. A tractor will shovel the waste and load it into a truck to haul it off-site."*

My response: The staff report states manure and waste material will be removed weekly, within 24 hours of harvesting, while the application states only that manure and waste removal will be done weekly. Which is it? If manure and waste are removed weekly as part of a process that occurs every week, this means that there will be manure and waste continually.

The staff report and application fail to provide information or mitigation regarding flies and other pests.

FUMES: The staff report states: *“Unusable portions of the animals will be sprayed with denature to eliminate the potential for odors and removed from the site on the day of the harvest and properly handled by a rendering company.”*

My response: What is “denature”? What is the environmental, health and safety labeling of this product or type of product? The staff report and application neglect to provide this information. Are there other products that will be used for cleaning, spraying, disinfecting areas? What are the labeling on them? Will they waft on the breezes or blow in the winds to any of the neighboring properties?

The staff report and application fail to provide detailed information about prevailing winds and wind direction year-round, and the impacts fumes will have on neighboring property-owners, residents and the general neighborhoods.

Several members of our family have serious lung conditions and must be careful about environmental exposure to fumes and dust. We are concerned about exposure to hazardous chemicals in fumes from a slaughterhouse and open-air holding corrals.

DUST: The staff report and application fail to adequately provide information regarding mitigation of dust from the open-air corrals and roads to neighboring properties. Language used in the report does not specifically state the access roads and property will be paved.

ECONOMIC VALUE: All of the above will have an impact to the economic value of our property, the neighborhood, and surrounding property owners. I have spoken with a local realtor who believes the property values in this area will decrease.

FINDING 4: The staff report states the project: *“Will not overburden existing public services and facilities, including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage, and other public improvements.”*

TRAFFIC: The application states there will be an Average Daily Trip (ADT) generation of 53 vehicles, including 25 ADT for up to 8 employees and general business operations, 13 ADT for the retail business, and for one day a week for pickups with trailers to deliver animals 10 +/- trucks a week.

My response: What does “10 +/-” mean? 11? 15? 20?

The application estimate of ADT neglects to include the tractor and dump truck(s) to haul manure off-site.

The application states: *“Primary access to the project will be off Brick Road, ... with access from Sheep Drive.”*

My response: The staff report and application neglect to include impacts to the use of Sheep Drive, which is also the access road to Empire Cemetery.

WATER: The application states typical water usage is expected to be a maximum 4,000 gallons per day on a typical harvest day and 8,000 gallons per day on a fair/event week harvest day.

My response: The city does not have capacity for large uses of water. My parents are under strict water conservation restrictions during the summer. The water pressure on their property is already very low. A typical watering day for my parents can take up to 4 hours due to the slow output of water.

The staff report and application neglect to provide information regarding distances from the proposed slaughterhouse to the Carson River, or to fully address historic flooding issues.

The staff report states the site's slopes are between 4 to 8%, but neglects to describe which direction the slope faces. Does it face the Carson River? The trailer park? The highway? What mitigations will be needed for runoff?

The staff report states that there is fill being placed within the special flood hazard area. Which direction will the runoff flow once that has been done?

The staff report states that the water table is greater than 80 inches. Exactly how deep is the water table? If it is 81 inches, this converts to 6 and 1/3 feet. The water table is significantly close to the surface, and this must be addressed.

SEWER: The application states the project will use an existing 8" sewer pipe that is less than 1% full. The staff report states that the 8" sewer main is approximately 10% full.

My response: Which is it? 1% full or 10% full?

How are possible breaks or leaks from the sewer main in these areas going to be mitigated? What is the maintenance, repair and replacement schedule for the sewer main, that will contain 4,000 +/- gallons of water, blood, urine, manure and hazardous chemicals? What is the age of that 8-inch pipe and the connecting joints?

STORMWATER: The staff report states the storm drain crosses Highway 50 to a 24-inch corrugated metal pipe.

My response is: This is within several hundred feet of our property, and within tens of feet from neighboring residential property. How are possible breaks or leaks from the storm drain in these areas going to be mitigated? What is the maintenance, repair and replacement schedule for the section of storm drain on the north side of Highway 50 where the proposed slaughterhouse is proposed to be located? What is the age of that 24-inch corrugated metal pipe and the connecting joints?

CONCLUSION:

You cannot make Finding 2. The project WILL be detrimental to the use, peaceful enjoyment, economic value, of development of surrounding properties of the general neighborhood; and will cause no objectionable noise, vibrations, fumes, odors, dust, glare or physical activity.

You cannot make Finding 4 as there are many disputable or unsubstantiated statements made in the staff report and the application.

Additionally, the staff report and the application neglect to provide significant information regarding impacts or mitigations to:

- A. Empire Cemetery
- B. Access via Sheep Drive to Empire Cemetery

- C. Carson River
- D. The site of the historic city of Empire
- E. Archaeological remains
- F. Future expansion
- G. Definition of "other livestock" (Horses, bison?)
- H. Disposition of livestock disqualified from slaughter by the USDA Inspectors?

Please vote no on the request for the special use permit to allow a slaughterhouse on Highway 50 and Detroit Road.

ALTERNATIVE PROPOSED MOTION: "I move to deny special use permit LU-2021-0308 based on the inability to make the findings contained in the staff report and the public testimony received by written and oral communication before and during the public hearing of September 29, 2021."

Respectfully submitted,

Kathleen Franco Simmons
2108 Utah Street
Carson City, NV 89701

ATTACHMENT: Copy of a map of the historic city of Empire, Nevada given to my father, George Howard by his father, Morris E. Howard who was born and raised in Empire, Nevada and buried in Empire Cemetery. These locations overlap or adjacent to the proposed slaughterhouse property.

EMPIRE CIT.
NEV.

W. W. WIGGINS



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Copy of map of Empire City, NV

Given to George Howard by

his father Morris E. Howard

who was born and raised in Empire City

and buried in Empire Cemetery

Morris E. Howard

(1907 - 1975)

1910 Census - resident of Empire City

1920 Census - resident of Empire City