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1013 Deetz Road
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February 19, 2017

Ryan Sawyer AICP and all others concerned
Analytical Environmental Services
1801 7th Street
Sacramento, CA 95811

Re; Draft EIR Crystal Geysers Bottling Plant Project

Dear Ryan Sawyer AICP and all others concerned:

As a resident of Mount Shasta I am writing to voice my concerns with the Crystal Geysers Bottling Plant Draft EIR. I moved to Mount Shasta like many others drawn by the pristine clean water, and natural beauty of the area. Each year people come from all over the world to visit Mount Shasta and to enjoy our natural environment; our clean water, our clean air, and our beautiful star filled night skies. The potential negative impacts of this large-scale industrial bottling plant on our small community and environment could be devastating.

The headwaters spring (Big Springs) of the Sacramento River is located in our City Park approximately 2000ft down hill from the proposed Crystal Geysers leach field. This headwaters spring is one of our community's main attractions. Visitors and local residents frequently use the Headwaters to collect precious Mount Shasta drinking water. This water is revered by many (including the Native Americans from this region: the Winemem Wintu) as sacred. The water from the headwaters comes from underneath Mount Shasta where it takes 50 years to reach the surface. Though this water is not monitored or tested, it is believed by many to be one of the purest and cleanest water sources on earth.

One of my biggest concerns regarding the Crystal Geysers bottling plant has to do with the potential for toxins from the proposed leach field entering our groundwater table and contaminating the headwaters of the Sacramento River. The proposed Crystal Geysers plant was previously permitted to leach 72,000 gpd of industrial rinse water. Under section **4.5 Geology and Soils** of the Draft EIR: waste water treatment options 3 and 4 call for increasing the leach field permit to allow for 108,000 gpd of not only industrial rinse water but also the addition of industrial process wastewater. This process wastewater will be treated onsite prior to leaching

out via sprinkler system onto the hillside, however I am extremely concerned about the leaching of plastic bottle contaminants and cleaning detergents into our groundwater system.

The Draft EIR section 4.8.3 titled **Regulatory Context** clearly outlines the federal, state, and local laws and statements pertaining to protecting water quality and availability in our region. Water is one of the most valuable resources we have in Siskiyou county and objective H of the County's General Plan clearly states that "every precaution must be maintained to eliminate the danger of any pollution to the streams and lakes as well as recharge areas through human and industrial waste and agricultural run-off". This proposed Bottling Plant project seems to be in direct opposition to the conservation element of Siskiyou County's General Plan.

On a state regulatory level the Draft EIR presents California State Water Board's adoption of the Federal Nondegradation policy, which is aimed at maintaining high quality for waters in California. As quoted in section 4.8.3 of the Draft EIR

"The nondegradation policy states that the disposal of wastes into state waters shall be regulated to achieve the highest water quality consistent with maximum benefit to the people of the state and to promote the peace, health, safety, and welfare of the people of the state. The policy provides as follows:

1. Where the existing quality of water is better than required under existing water quality control plans, such quality would be maintained until it has been demonstrated that any change would be consistent with maximum benefit to the people of the state and would not unreasonably affect present and anticipated beneficial uses of such water.
2. Any activity which produces waste or increases the volume or concentration of waste and which discharges to existing high-quality waters would be required to meet waste discharge requirements which would ensure (1) pollution or nuisance would not occur and (2) the highest water quality consistent with the maximum benefit to the people of the state would be maintained (SWRCB Resolution No. 68-16).

The proposed options of leaching industrial rinse and process wastewater from the Crystal Geyser leach field directly above the Headwaters spring seems to be in violation of the State Water Boards Nondegradation Policy. Yet the Draft EIR says that this impact would be less than significant and that no mitigation is necessary. The Draft EIR states

"The estimated concentration of constituents in the industrial process wastewater effluent generated by the Proposed Project under Wastewater Treatment Options 3 would be much less than the California MCL for drinking water and the resulting concentration in the shallow aquifer underneath the leach field would be even less than the generated effluent due to the natural filtration during percolation and dilution from mixing with the existing groundwater."

So in other words, the Draft EIR seems to say that the "solution to pollution is dilution", and that since the resulting constituent concentration in the aquifer will be less than the California

Ryan Sawyer AICP and all others concerned

February 19, 2017

Page 3

Maximum Contaminant Level for drinking water it is not a significant problem. This however is in violation of the Federal and State nondegradation policy, which states that where the existing quality of water is better than required under existing water quality control plans, such quality would be maintained. We do not want these pollutants leached out into our ground water aquifer in Mount Shasta. This town is known for its pure clean drinking water and we do not want our valuable resource to be contaminated (least of all by an international corporation that has no long term vested interest in our community).

Therefore it is my opinion that the Draft EIR wastewater treatment options 1 and possibly 2 are the only viable options for our community. The city's current sewer system would most likely need to be updated and expanded to account for the increase of 108,000 gpd of wastewater. I would also like to request that the required sewer system expansion costs be assumed entirely by Crystal Geysers.

I am also very concerned about the potential affect on our local groundwater supply. In section 4.8 of the Draft EIR it states, "cumulative impacts associated with groundwater supply are **less than significant** and no mitigation is required". However I have heard multiple first hand accounts of nearby private well's running dry during the Plants period of Coca-Cola Dannon operation. It concerns me that there is no account for these occurrences in the Draft EIR.

I am also very concerned about the increased light pollution that will be emitted from this plant especially if it is planning to operate 24 hours/day. I am glad to see that there are plans for directional light-emitting diodes (LEDs) with drop shielding to eliminate light from spilling off site, however more needs to be done to ensure our dark sky's are preserved. According to the International Dark Sky association "LED [] fixtures contain large amounts of blue light in their spectrum. Because blue light brightens the night sky more than any other color of light, it's important to minimize the amount emitted. Exposure to blue light at night has also been shown to harm [human health](#) and [endanger wildlife](#). [IDA recommends](#) using lighting that has a color temperature of no more than 3000 Kelvins" (<http://darksky.org/lighting/lighting-basics/>).

I do not see how the proposed plant operation of 24 hours a day six days a week is suitable for our quiet sleepy town. The light pollution emitted from this plant will drastically affect our night sky. And the constant rumble of semi trucks coming on and off the highway and in and out of town is a very significant project impact that I don't feel has been thoroughly addressed. Noise pollution is a real problem and is proven to have severe affects to your health and mental state. Research has shown a link between environmental noise and serious health issues like cardiovascular disease and stroke (<http://ec.europa.eu/environment/integration/research/newsalert/pdf/47si.pdf>). Road traffic noise especially at night has been shown to increase the risk of high blood pressure (<https://www.ncbi.nlm.nih.gov/pubmed/18270210>). "Your emotional response to noise pollution can also be significant, so much so that it has a specific name: noise annoyance. This describes the negative feelings noise can create such as disturbance, irritation, dissatisfaction and nuisance, as well as a feeling of having one's privacy invaded (<http://www.independent.co.uk/life-style/health-and-families/features/how-noise-pollution-can-affect-your-health-a6853746.html>).

Ryan Sawyer AICP and all others concerned

February 19, 2017

Page 4

Many people in our community have come here intentionally leaving big cities, seeking the peace and quiet that Mount Shasta provides. With the introduction of 24-hour truck traffic in our community we will lose the peace and quiet that so many of us moved here for.

Section 6.6 of the Draft EIR presents a comparison of alternatives, I support Alternative 6.6.1 A- **No Project Alternative** or a variation of Alternative 6.6.2 B- **Reduced Intensity**, including a reduction of Plant operation hours to exclude nighttime operations. I also feel that the use of Alternative Bottling Materials (section 6.4.3 of the Draft EIR) such as recycled glass bottles or at least recycled plastic bottles is a must for the consideration of this project. In a time of drastic climate change we need to be responsible and take actions to reduce our carbon footprint. This project should be held accountable to reducing carbon emissions and should be required to be a carbon neutral project.

I thank you very much for taking all of our comments into consideration while completing the Crystal Geysers Bottling Plant EIR. I know that with your educational backgrounds in diverse environmental fields many of you have the best interest of the environment at heart. Please consider the potential devastating effects of this Bottling Plant to our community and our natural environment while you are drafting the final EIR. Thank you for your good work and for protecting our environment.

Respectfully,

Andrea Vyeniello RN