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Attention: Ryan Sawyer AICP

cc: County of Siskiyou Board of Supervisors, City of Mount Shasta

February 20, 2017

To all that this may concern,

I am a homeowner, landowner, and tax payer residing on Ski Village Drive in Mount Shasta, approximately 1/2 miles from the proposed project. Thank you all for the opportunity to share my concerns and comments. I have reviewed the DEIR and understand the scope of the project. As a resident of Mount Shasta, I have my concerns regarding the quality of life here in our town.

Let me begin with the description of the environmental setting provided in **3.3.1 Surrounding Uses** and **4.1.2 Project Site Setting**. It offers "setting immediately surrounding the project site consists of single family rural residential units" on the North side, and "low density housing" on the Eastern and Southern boundaries. Although the community is led to believe that the Crystal Geysers lands are zoned M-H "Heavy Industrial", paragraph **3.3.3** reveals that only the parcel where the plant and leach field is located is zoned M-H. The North parcel is zoned agricultural AG-2, and the East parcel is zoned R-R-B-1, rural residential. This is significant because it is commonly regarded that the existing water plant is "poor" or "improper" land use and should never have been built in the first place. Even most of the land currently owned by Crystal Geysers is not zoned for any industrial activity. But the building is already there and the question becomes "where do we go from here?" This answer may come from analyzing the DEIR. As a point of reference, please consider that the existing building was allowed as a "water bottling facility" and built without the benefit of an EIR. As a water bottling facility, it carries with it the applicable allowances and limitations based upon such use. But a review of the current DEIR reveals a substantially greater use than a water bottling facility, as it is a truly beverage manufacturing plant, with much more significant impacts upon the surrounding community. And it wants to operate 24/7, which has never occurred historically and is contrary to the information offered by CG representatives at their public presentation in 2015. So, does the community live with what it already has and put a cap on it, or does it continue to further entrench itself into a poor land use decision and create a much grander mistake for the community?

The DEIR document provides much detailed information and it would be impractical for me to describe every detail. For the sake of analysis, I will touch on only a few items to demonstrate the dramatic increase in industrial impact that is proposed in this project. Let us begin with the estimated propane use of the project.

“Propane Fuel Use”, section **3.5.10**, “Energy Use and Associated Infrastructure” estimates that the project will consume 3,302,294 gallons of propane per year. That is 3.3 million gallons of propane, mostly for boiler operation and propane powered generators. Those uses were not required in the previous use by CCDA. But lets look further into what that means for Mount Shasta. Crystal Geysers (CG) has already installed a 30,000 gallon propane tank, without proper permits, in an area previously described as “rural residential”. There are homes, schools, churches, and licensed day care facilities nearby. But a further analysis reveals that the proposed propane use would require that the 30,000 gallon tank would need to be refilled 110 times per year. However, no propane truck can carry 30,000 gallons, as most carry 3,000 to 6,000 gallons, and only the largest tankers built can carry 11,000 gallons. Even if the largest truck possible was used, that would mean that over 300 refill connections would be made per year, passing 11,000 gallons of highly explosive gas every time. Please look up the news article covering “Mexico City Propane Delivery Explosion”, Associated Press, January 30, 2015. For some more graphic insights, just Google “propane explosions, images”. This potential “impact”, and associated hazards to human life was not described in the DEIR document. Are our local emergency personnel trained, or even equipped, for such a potential disaster?

“Noise Impacts”, section **4.10.4** describes that a “significant and unavoidable” impact will occur. Well, I know well enough that we can “avoid” the impact by not allowing it to happen. But let’s look further. Operational noise, other than the propane generators and the truck component, was determined to be less than significant. The full description was found far into the document in **Appendix T** “Noise Impact Analysis”, and itemized in **Appendix E**. The generators themselves will create a sound power level of 108 dB, which is equivalent to a Rock Concert, according to **Figure 3** of **Appendix T**. Now from my house, I can clearly hear an occasional rock concert coming from Shastice Park, or from a Downtown event, which is much farther away than the CG plant. We can tolerate this occasional noise as it is very rare, and it indicates a positive event that is helpful to our town image. But the project proposal describes a 24 hour operation. Would we want to tolerate a 24 hour, 7 day a week rock concert? The **mitigation** for this nuisance is to 1) install quieter generators, or 2) build a sound barrier around them. I feel we should not settle for less than **BOTH** mitigations. But look further into the rest of the mechanical equipment. Individual Chillers, Cooling Towers, Packaged HVAC units, etc., are averaging 95 dB each, equivalent to a tractor or motorcycle. Combined, they are estimated to be 101.4 dB. City traffic is rated at 78 dB, according to Figure 3. That will make the lower end of Ski Village Drive have a noise source louder than New York City Times Square, and 24/7. **Table 4.10-1** “Typical Noise Levels” says that a jet fly-over @1000’ is 100 dB, less than the combined mechanical equipment, even without the generators. According to that chart, the mechanical noise of the proposed CG project will be louder than a food blender at 3 feet away! Is this not significant? And for a quiet mountain town? Another consideration is that the Packaged HVAC

units are on the roof, broadcasting unshielded 95 dB's into the environment from the rooftop. I am also very familiar with winery processing equipment, which is very similar and which use the identical "Evapco" chillers that CG recently installed. The compressors in these units roar constantly, and it is a very foreign noise that is very uncomfortable to hear. **Mitigation** means that sound barriers must be placed around all of this equipment, if they are allowed at all.

And then there is the truck noise. Heavy diesel delivery trucks will create significant noise in the vicinity of North Mount Shasta Blvd. But what of the "back-up alarm beepers" that are required on all trucks and forklifts and will be sounded with every truck at the loading dock? This was barely mentioned in the analysis, and no dB levels were given. These devices were created to be an "alarm", and warn workers of danger, even in the noisiest of construction sites. This noise was designed to penetrate all background noises, despite the volume, and can be heard above heavy machinery. It is in the same family of sound as your household smoke detector and is a very annoying unnatural sound in the outside environment. Yet the proposal promises this disturbance at all hours of the night, every day of the week. This should not be allowed at all. Looking back at the Noise Analysis in **Section 4, page 4.10-27**, the upper paragraphs describe that truck noise disturbance can be reduced by "sleep with windows closed". We all can remember the prolonged heat wave that we experienced last year, and how our "cool mountain nights" are one of our greatest joys. Is forcing us to sleep with the windows closed the kind of **mitigation** that is being offered here? This is not acceptable.

One more note on noise. At the bottom of page **4.10-20**, it states that "No reported noise complaints were received by the County during previous construction activities occurring between 2015 and 2016". This is an absolute lie, as many of my neighbors living closer to the plant attempted to register complaints to the County regarding constant nuisance noise. However, they were referred to other agencies and experienced a "deaf ear" for the complaints. I will not speak for them, as you will receive their letters directly which will prove that this statement is purely false.

Traffic Impacts are explained in section **4.11 "Transportation and Circulation"**. First, section **4.11.2 "Existing Road Network"** page **4.11-1** is incorrect. Ski Village Drive is posted 25 mph in the vicinity of the project site, not 35 mph as stated. The sign is right in front of the Sheriff's Office. Transportation effects may need to be recalculated.

Table 4.11-4 "Project Trip Generation" describes that 100 truck trips per day are estimated. This figure is not itemized. Does this include the daily propane deliveries as previously described, as well as supplies such as chemicals, flavorings, cartons, pallets, disposal of waste water, etc, etc? A project of this scope must spell out **all** possible truck traffic impacts.

Impact 4.11-5, on page **4.11-17**, states that "impacts relating to increased hazards and vehicle safety would be less than significant". I do not believe that there is any data to support this. A stopped Southbound truck attempting a left turn into CGWC Drive, across North Mount Shasta Blvd, on a curve and in the vicinity of a railroad crossing, is a hazard. But there will be 50 of

these each day and night. Exiting Northbound trucks will likely need to swing wide to make the turn out of CGWC Drive, and will likely cross the center line, 50 times per day. How can all this not be a safety hazard? Sensible **mitigation** requires widening North Mount Shasta Blvd. at the entrance to CGWC Drive, along with the installation of a left turn lane. This should be paid for by the project applicant.

Water Use is described in **section 3.5.2** and no significant impacts were found. However, there is no data available to make this determination. The comparison to previous uses in **section 3.2** "Background" demonstrates that the projected water use of 150 gallons per minute is nearly equal to water use by CCDA from years 2000 to 2010, at an average of 160 gallons per minute. During this period, when CCDA operated in full capacity, many neighborhood wells were negatively impacted, as many ran dry and/or pulled turgid water. Complaints were submitted to the County, but were redirected to CCDA, and again fell on deaf ears. Fortunately for all, CCDA closed down and local wells recovered. Again, you will be receiving letters from these neighbors who were negatively impacted. This section of the DEIR is completely insufficient and offers no protection of local wells **nor mitigation** for negative impacts. **Section 3.4** states that CG will "withdraw groundwater in a sustainable manner that does not result in negative effects on nearby springs or wells". That is all the protection we have, with no accountability. **Impact mitigation** should require strict water use parameters, groundwater monitoring, local well monitoring and impact investigation, and defined **mitigation** procedures such as curtailed water use and/or improvements to local wells, all paid for by the project applicant.

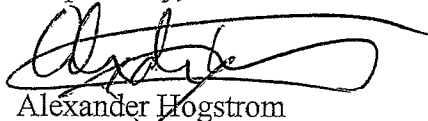
Odors were briefly described in two sentences in **section 4.2.4** on page **4.2-11**. The whole section was literally two sentences, and stated that odors are "subjective" in nature. No significant impacts were found. Again there is no quantified data. Further discussion of air pollutants revolves around carbon combustion. But what about process odors? The project describes "brewing tea", and fruit flavorings will be used and will end up in the wastewater as well. Will our clean mountain air smell like fruit concentrates? There is nothing in this DEIR that assures us that it will not. What is the **mitigation** here?

Wastewater is described in **section 3.5.8**, and much of this is beyond my area of expertise. By reading the DEIR, it does not appear that anybody has a clear understanding of how this would work. The project should not be allowed to proceed until a operable solution is resolved. However, **a particular red-flag is the irrigation system** as described beginning on **page 3-22**. This is a component of Wastewater Treatment Option 4. The constituents of the irrigation water is not revealed at all, but it appears that this is a plan to dispose of treated wastewater by spraying it out into the environment. Remember that the Northern and Eastern Project Sites are **NOT** zoned Heavy Industrial. They are zoned Ag and Rural Residential, and are **NOT** to be impacted by industrial wastes generated from a parcel with different zoning. This appears to be a land use violation. The proposed Eastern Field, surrounded by residential units, is proposed to have sprinklers disposing treated wastewater for 8 hours per day. This particular field is historically a "Reforestation Site" established by Danone, the original users of the water plant, as a mitigation to protect the aquifer. Dumping wastewater 8 hours per day would also spread fungal diseases

into the canopies of the conifers and would saturate their roots during the normally dry Summers. What is the Air Quality impact of evaporating treated wastewater by spraying it into the atmosphere? This is not described in the DEIR. Page 4.2-22 also says that the “likelihood that odors detected by nearby sensitive receptors would be reduced” by the water treatment “when disposed of at the leach field”. But what about odors from wastewater that is sprinkled out into the neighborhood? Odors may be “reduced”, but are they eliminated, or are they detectable? This entire section of the DEIR is absolutely unacceptable, and **mitigation** requires eliminating the Wastewater Treatment Option 4, and the Wastewater Irrigation System entirely.

Conclusion. The DEIR describes a greatly expanded use from previous history, and defines some significant negative impacts from the project. These are described as “unavoidable”, yet they can be avoided by simply not allowing this level of use. Representatives of Crystal Geyser themselves presented to the community that they would operate 5 days per week from 7:00AM to 7:00PM. The expansion of use and 24/7 operations creates much of the significant impacts. This simply should not be allowed. Many other potential impacts were inadequately studied in this document and must be addressed before this project may continue. Potential pollutants were seen as less than significant, but previous uses did not generate this level of pollutants. For a closing example of potential hazards, **Mitigation Measure 4.2-1**, on page 4.2-24, describes the **mitigation** for reducing exposure to excessive TAC’s (Toxic Air Contaminants) generated by the proposed project. Rather than reducing the level of Toxic Air Contaminants, the resident caretaker is only allowed to occupy the caretaker residence for 40 hours per week to avoid elevated cancer risks. What kind of **mitigation** is this?

Respectfully,



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