

February 22, 2017

Analytical Environmental Services
1801 7th Street
Sacramento, CA, 95811
Email: crystalgeyser@analyticalcorp.com

Attention: Ryan Sawyer AICP

Re: DEIR for Crystal Geyser Proposed Project in Mount Shasta

Mr. Sawyer,

Thank you for this opportunity to share concerns about the proposed Crystal Geyser facility in Mount Shasta. As a homeowner with two parcels on Ski Village Drive, as a taxpayer, and as a citizen concerned about preserving the quality of life in our neighborhood and in our town of Mount Shasta, I ask that the concerns stated here and by our neighbors be strongly considered. I hope that Crystal Geyser will be a "good neighbor" and honor the whole area, all of the neighbors and nature that is our home. Unfortunately, the DEIR, has many inconsistencies, much information is vague and many of the stated impacts need to be quantified.

As I live within 1/2 mile of the proposed operation, my concerns will affect me and my household very much. We depend on a well for our water and with the drought of the last few years, the water table has dropped. We do not know if the rain and snow we have received, will replenish the local aquifer. Throughout the DEIR, many of the issues, like water use and how it affects the local aquifer, were treated quite cavalierly with statements like "no significant impacts" or "significant and unavoidable impacts". **For Whom? We as immediate neighbors, and our town will be significantly impacted.** Here is a list of my main concerns.

Hours of Operation:

When I attended town meetings where Crystal Geyser (CG) representatives spoke, we were assured that they wanted to be "good neighbors" and a benefit to the community. One of their statements was that the proposed CG plant would operate 5 days a week from 7AM to 7PM. The CG website states that the "facility MAY operate up to 24 hours per day, 6 days a week, depending on the product and the demand." Now the DEIR states that CG may operate 24/7. This is a direct contradiction from the original statements from CG representatives.

Mitigation:

CG needs to scale their operation to a size that fits the neighborhood, the water supply, the roads and town of Mount Shasta. Operating 5 days a week, from 7AM to 7PM would help to mitigate many of the issues that have been stated by the many letters that have been sent to Siskiyou County Community Development in the past and that Analytical Environmental Services is receiving in the present. This very same mitigation will be stated throughout this letter under different subject headings. The size and scope of the proposed CG plant is a "significant impact" to our local environment.

Hydrology, Water Use and Water Quality:

Water is life! We need to be with great care in how we treat our water supply. CG is planning to pump from our aquifer, more water than the previous plants, Danone and Coca Cola Dannon

(CCDA), as stated on the CG website. The DEIR does not address impacts in any way, nor offer any monitoring program.

Excessive pumping can affect the water table, and local wells. Wastewater from manufacturing can pollute the soils in a leach field and the underground aquifer and the downstream water supply.

Mitigations are absolutely necessary for all water issues.

A Monitoring Program, with enforceable standards must be in place for:

- The amounts of water pumped, with caps to protect the aquifer.
- Limits on pumping in case of fluctuation of the water table, as in a drought.
- The monitoring of all wastewater released into the leach field or downstream.
- An impact mitigation policy for restoring neighbors wells, if there are problems.

Energy Use and Associated Infrastructure (Includes Public Safety):

When CG put in the 30,000 propane tank, in an area with homes, churches, schools and daycare facilities, my first reaction was concern for the safety of our neighborhood. The previous water bottling facilities did not have such a massive infrastructure for heavy manufacturing. In the DEIR, it is stated that CG plans to use 3,302,294 gallons of propane a year. The CG propane tank will need to be continually filled. I learned that most propane fires and explosions happen when the tanks are being filled from delivery trucks. There is not one single mention of potential impacts or safety issues, from the use of the propane tank by CG. This is a tremendous oversight, when an explosion could, within minutes, affect everyone within one mile of the proposed CG operation.

Also, as an area with significant wildfire danger, the CG propane tank is very dangerous. There was a recent wildfire in the City of Weed just North of Mount Shasta in October of 2014. The Boles Fire moved very quickly and burned 150 homes, 2 churches, a Community Center and many businesses. Residents had to run for their lives. The wildfire jumped Highway 97 and Interstate 5, causing 1,500 to 2,000 people to have to be evacuated. There needs to be a plan to avert any and all wildfire danger away from the propane tank or an alternative energy needs to be used.

Calculations show that with the proposed propane use, of 3.3 million gallons, the 30,000 gallon propane tank would need to be filled approximately every third day, over 100 times each year. That is excessive danger to the neighborhood. With no safety protocols.

Mitigations:

- Safety training for all employees and for all propane delivery drivers. Safety and emergency training for all emergency service providers. Paid for by CG.
- An emergency evacuation plan for all within the one mile radius of the plant.
- A restorative insurance policy for all affected should there be a propane explosion disaster.
- A plan for wildfire protection at the CG plant, to protect the propane tank from wildfire.
- Not using the propane generator at all, finding other alternatives.

Noise Impacts:

The amount of heavy operational equipment that CG has already installed shows a disregard for neighbors. The proposed CG operation would make a very significant impact of continuous noise in our neighborhood. Very large chillers, HVAC units, cooling towers and propane

generators, make an incredible amount of noise, day and night. The decibel levels are mentioned, yet the collective levels of noise and the continuous operation will be the greater issue.

The other significant noise impact will be large diesel semi-trucks, coming and going, forklift drivers, and delivery trucks. All trucks and forklifts, by law, need to have back up "beepers" which will warn personnel that heavy equipment is backing up. These "beepers" are loud! They can be heard at long distances, for safety reasons.

The mitigation offered is that we can "sleep with windows closed". That is not a mitigation! Nor is it a "significant and unavoidable" impact.

Mitigations:

- Operational hours between 7AM to 7PM to minimize noise levels at night.
- Truck trips for all deliveries and shipping, forklift operations, only from 7AM to 7PM.
- Install sound barriers around the propane generators.
- Build large berms around the area of the CG operation and plant with trees to help absorb sound.
- Build sound barriers around the equipment on the roof.

Traffic:

This is another area that was inadequately covered in the DEIR. Living here we know the traffic and safety issues that concern us as we drive to different areas in town. Living in the neighborhood of the CG plant, I regularly drive the proposed roads to be used for CG trucks, delivering and shipping goods. The DEIR states there will be 100 truck trips a day, which is 50 trucks going in and out. It does not state whether these are just the shipping trucks, trucks for delivery of supplies or propane trucks.

Mitigations Concerning Numbers of Truck Trips:

- There needs to be delineation of actual trucks going in and out, how many are for shipping products, how many for delivery of supplies (fruit juice concentrates, bottling supplies, boxes, and all miscellaneous supplies), how many for propane trucks.
- Roads need to be improved with widening where trucks are making turns, with turn out lanes. There are blind curves so signs will be needed to warn of truck traffic.

Proposed Truck Routes:

The DEIR states the designated routes for trucks, with southbound trucks exiting at Exit 740 north of town heading which directly goes into North Mount Shasta Blvd and with northbound trucks exiting at Abrams Lake Exit 741 then taking Spring Hill Road south to North Mount Shasta Blvd. This is a difficult intersection. The designated roads, as they are right now, are totally inadequate for this many semi-trucks every day.

- Traffic along North Mount Shasta Blvd varies greatly with the season. In summer, the road is very busy with visitors who often do not know their way around. In winter, the road can have very difficult and sometimes dangerous driving conditions, such as snow or ice.

- The Mount Shasta City Park is on Nixon Road, which is a cross street to Mount Shasta Blvd.

There is often a continuous stream of traffic to the City Park, especially during special events like the Blackberry Festival and the Children's Easter Egg Hunt. Cars can be backed up onto Mount Shasta Blvd and often cars are parked on the shoulder of the road on Mount Shasta Blvd as these events attract 100's and even 1,000's of visitors.

- The Union Pacific Railroad tracks run right along Mt Shasta Blvd. When the train is crossing Nixon Road, cars are backed up onto Mount Shasta Blvd.

- Where the I-5 exit and I-5 onramp and Spring Hill Road converge is a challenging intersection. Drivers are coming fast off I-5 on South Exit 740, other drivers are speeding up from Mount Shasta Blvd to get on the onramp North, and other drivers from Spring Hill Road are attempting to turn left onto North Mount Shasta Blvd, where it is hard to see those coming South off the I-5 exit and there is a blind curve so one cannot see drivers headed to the North onramp. This is the proposed route for CG trucks and there are many potential traffic mishap possibilities.

Mitigations:

- Signs on the blind curves need to be posted to warn drivers of truck traffic.
- Mount Shasta Blvd needs to be widened in areas where trucks need to turn into Crystal Geysers Water Company Drive (CGWC) with a left hand turn out lane for the CG trucks.
- Both South and North turn out lanes need to be added at Nixon.

In Closing:

Crystal Geysers bought a water bottling facility that was exempt by local law from needing a permit to pump water. They have proposed a significantly expanded project that is not a simple water bottling plant. They are proposing an operation to manufacture sparkling fruit juice drinks and teas, which requires a more extensive infrastructure, more water use, more polluted wastewater and possible air pollution, more traffic, more noise and less safety for the surrounding citizens of the neighborhood and town of Mount Shasta.

It is imperative that CG reconsider the size of their operation to fit in with the community as it is now. We want transparency in their operations and communications. We want monitoring of water use, water quality, local wells, air quality, noise and lighting, traffic and any other impacts that affect the surrounding area. We want useful and enforced mitigations. We value our community, our clean water and clean air, the quality of life that we have here, surrounded by nature.

Respectfully,



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