

February 20, 2017

To: Mr. Ryan Sawyer AICP  
Analytical Environmental Services  
1801 7<sup>th</sup> Street  
Sacramento, CA 95811

Subject: **Comments on the Crystal Geyser Draft EIR (DEIR)**

Dear Mr. Sawyer:

This letter is in reference to the January 2017 Draft Environmental Impact Report on behalf of Crystal Geyser Water Company, Mt. Shasta, California. I have a professional background as a State of California certified operator (Grade III) in the operation of water and wastewater treatment plants, and as an environmental compliance inspector for local municipalities. Thank you in advance for allowing me to share my concerns regarding the inadequacy of the DEIR regarding the disposal of wastewater discharges from the proposed Crystal Geyser Bottling Plant in Mt. Shasta, California.

Regarding the future potential capacity and ability to treat all wastewater at the City's WWTP, both capacity for waste stream flow and concentration of wastewater constituents (pollutants) should be considered in relation to the City's overall ability to attract other commercial and/or industrial businesses in the future, including pending WWTP permit applications of interest to local developers.

## **4.12 UTILITIES**

### **4.12.1 Wastewater System**

#### **Environmental Setting – Wastewater Conveyance Facilities**

The capacity analysis for the City's wastewater collection system is Attachment A to Appendix L. It describes a limiting pipeline on South Old Stage Road, South of Ream Road, between Manholes 13A and A15. The current sewer system capacity is inadequate for disposal of waste from Crystal Geyser at this time. The City's collection system has had numerous Sanitary Sewer Overflows during the 2016-2017 wet weather season. Until an adequate inventory of collection system bottlenecks and problem areas is identified and shared with the public and made a part of this DEIR, the DEIR for Crystal Geyser's wastewater flows, specifically Option 1 for wastewater treatment disposal, is wholly inadequate until the City can fix its underlying collection system infrastructure to accommodate both storm water, industrial, and domestic flows.

## **Environmental Setting – Wastewater Treatment Plant**

The DEIR as it stands is wholly inadequate in part because it is incomplete. We do not know the quantity or quality of industrial process wastewater flows. We do not know what constituents will be in industrial rinse wastewater sent to floor drains. All constituents and amounts have been estimates. Crystal Geysers has purportedly decided not to bottle juice products. This should be reflected in the DEIR.

Disposal of all wastewater flows from the proposed Crystal Geysers Bottling Facility should be directed to the City's WWTP after the new expansion and upgrade for treatment capacity and constituent treatment is completed (estimated completion date is 2020). Only Option 1 should be considered to dispose of Crystal Geysers' flows, due to hydrology reasons and other impacts on local water quality and quantity for the City's aquifer and local wells. In addition, plans to possibly over-irrigate trees, shrubs, and other land adjoining the Crystal Geysers facility has the potential for adverse impact on the underlying aquifer and water quality of neighboring properties.

### **4.12.1.2 Regulatory Framework**

#### **Federal Anti-Degradation Policy**

The policy directs states to adopt a statewide policy that includes the following primary provisions: (1) existing instream uses and the water quality necessary to protect those uses shall be maintained and protected; ..... (3) where **high-quality waters** constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and **waters of exceptional recreational or ecological significance**, that water quality shall be maintained and protected. The leach field is not a viable option for disposal of any wastewater from Crystal Geysers bottling activities.

#### **State and Regional**

#### **Sanitary Sewer Overflow (SSO) Reduction Program**

The City of Mt. Shasta has had numerous SSO's during the recent 2016-2017 wet weather season. Until the City achieves full capacity compliance with its collection system, unpredictable and inadequately estimated waste flows from the Crystal Geysers facility should not be allowed. This recommendation is also advised under **Wastewater Management Goal LU-16, Policy LU-16. 1; Implementation Measure LU-16.1(b), in the City of Mt. Shasta's General Plan.**

## **Siskiyou County General Plan**

**Siskiyou County Code Title 5, Chapter 2 of the County of Siskiyou County Code** “establishes the provisions to which the Siskiyou County Health Officer can issue permits for and inspect private sewage disposal systems in the County including **sewage disposal and treatment systems for industrial uses**. The Proposed Project would have to comply with these standards as enforced by the County.” The DEIR has given no indication that the County has given consideration or authorized sewage disposal (Options 2 – 4) and an onsite wastewater treatment system (Option 4) for the Crystal Geyser facility.

### **SECTION 3 - – PROJECT DESCRIPTION**

As described in Appendix C, the proposed onsite wastewater treatment system utilized in Option 4 would consist of a membrane bioreactor followed by reverse osmosis. Option 4 would likely have equipment outside the building, including aerobic biological treatment, which would have the potential for negative impact regarding noise and odors in the vicinity.

#### **3.5.9 Storm Water Detention**

“The existing storm water detention basin, which was designed to meet 100-year flood requirements for all run-off within the project site watershed, drains via a 5-inch pipe on the south side of the basin to a ditch that parallels the McCloud Railway through the Plant, travels under Mt. Shasta Boulevard, and then connects to the City storm drainage system, eventually **draining into North Fork Cold Creek, and finally Lake Siskiyou. The 5-inch pipe was sized to restrict the flow of storm water from the site to pre-project levels (CH2M Hill, 1997).**” The City of Mt. Shasta at present does not have a collection system able to handle storm water, domestic, and industrial flows when all are combined. Where there are separate systems for storm water and domestic/industrial flows, areas of the collection system are also impacted by inflow and infiltration. The DEIR is inadequate in that it does not take into consideration the current state of disrepair and expansion needs for the collection system. There was a major spill of significant sewage into Cold Creek and into Lake Siskiyou between January 2 and 12, 2017.

### **SECTION 6.0 – ANALYSIS OF ALTERNATIVES**

#### **6.2 Overview of the Proposed Project**

##### **6.2.1 Project Objectives**

It appears that the consumer demand for, or market share for Crystal Geyser products may be decreasing, because they have recently discontinued their metro mint and juice squeeze lines. The facility in Mt. Shasta was purchased by Crystal Geyser in 2013. An alternative project should be considered because Crystal Geyser has not opened, they are experiencing declining market share for their products, and intend to close other bottling facilities in order to open one facility in Mt. Shasta. The project description has declined from a robust 4-bottling line operation

with over 100 employees, to a single bottling line with 30 employees. The City of Mt. Shasta needs sustainable business models for long-term economic development and growth, not a bottling company that is losing market share.

**A project objective** is “to modify the existing facilities at the Plant in a manner that incorporates **sustainable** building and design practices, **recycling** efforts, and other **conservation** methods, in order to **reduce water use**.” An alternative option for Crystal Geysers would be to use their reverse osmosis filtration equipment to utilize direct potable reuse techniques, by bottling for sale the recycled water they would otherwise dispose of to the leach field or to the City’s WWTP. Most bottled water companies are utilizing the same technology, reverse osmosis, to bottle tap water from local municipalities and/or low-quality well sources. The value for Crystal Geysers in locating their single operational facility for bottling their sparkling water products is in *the City of Mt. Shasta’s brand* – bottling the water straight from the source. Crystal Geysers may find their costs lowered if they choose to recycle their process water for drinking water. Since after treatment Crystal Geysers’ wastewater sent to the leach field will be in compliance with Title 22 drinking water standards, an option might be to bottle it and save on disposal options.

**A project objective** is “to withdraw groundwater in a sustainable manner that does not result in negative effects on nearby springs or wells, the underlying shallow or deep aquifers, or the surrounding environment.” A requirement should be made for Crystal Geysers to make transparent to the City and to the public, all water it pumps from the DEX-6 well for use in its products.

**A project objective** is “to create new **employment opportunities** for the local and nearby communities, promote **sustainable** economic development, provide for adequate services and infrastructure to support the project, and contribute to Siskiyou County’s (County’s) tax base.” Only 30 to 60 jobs, depending on the number of bottling lines employed, will not provide sustainable jobs and viable long-term career opportunities. It is likely that the jobs will be part-time or temporary full-time positions hired by the local temporary personnel agency.

## **6.5 Alternatives Evaluated in this Draft EIR**

### **6.5.2 Alternative B – Reduced Intensity**

Of all the alternatives, the reduced intensity alternative, limiting the facility to one bottling line with no expansion options, with all the wastewater being discharged to the City’s wastewater treatment plant under Option 1 of wastewater treatment and disposal, is the best alternative for a business model and operation that will probably not be able to maintain market share over the next decade. This would also mitigate the problems of traffic circulation and noise, by limiting the facility to operational hours of Monday through Friday from 7 a.m. to 7 p.m., with no holiday or weekend operation. This would also include trucks entering and leaving the facility. The single bottling line would also preclude the brewing of any tea or juice products, just “sparkling” mineral water.

Sustainable economic development is not defined by the bottling of water and exporting it out of the watershed. Crystal Geysers purchased the plant in 2013. In 2015, new state legislation, in the form of the Sustainable Groundwater Management Act (SGMA) is an effort to

begin to manage our most precious resource – water. Although bottled water companies are exempt in the State of California, and the underlying groundwater basin of the City of Mt. Shasta does not fall under the regulatory auspices of SGMA, it should be recognized that this project is not sustainable, feasible, or viable from an economic, social and environmental perspective.

Thank you very much for your attention to these comments. Please feel free to contact me with any questions or concerns you may have. I would appreciate you keeping me informed of the decision regarding this DEIR.

Sincerely,

Pamela A. Neronha, MPA  
MBA in Sustainable Management candidate  
Presidio Graduate School, San Francisco, California

*Co-founder and CEO*  
Pluvion, Inc.  
505 S. Mt. Shasta Blvd., Suite 2  
Mt. Shasta, CA 96067  
415-603-8972  
paneronha@gmail.com