

02/24/2017

Analytical Environmental Services
1801 7th St.
Sacramento, CA 95811
Attn: Ryan Sawyer AICP

Comments on the Crystal Geyser Draft EIR (DEIR)

Dear Ms. Sawyer:

Following are my many concerns regarding the adequacy of the Draft EIR for the Crystal Geyser Beverage Manufacturing Plant in Mt Shasta.

TRAFFIC

I agree with all points made by Traffic Analyst, Tom Brohard.

I find the traffic segment of the DEIR is not adequate:

Safety assessments of intersections should include traffic accident history. What appears to be safe using tables may not be when looking at the terrain and what actually occurs at these intersections.

Truck impact is minimized by only using a 1.5 passenger car equivalent. Compared to cars, trucks are much more detrimental to roads and block traffic, cause more noise and pollution, and are a larger safety hazard. How can equivalents be made if no mention is made of how big the trucks will be.

Clarification is needed if the 100 truck trips just includes trucks transporting the product. If so, delivery trucks for propane, plastic forms, and beverage ingredients; and any trucks used to transport sludge or recyclables have to be included along with the size of the trucks. As of this report, CG should be limited to a total of 100 truck trips a day.

The safety assessments for pedestrians and bicyclists must include input from the Mt Shasta Alternate Transportation Committee. N. MS Blvd. is a class 2 bike route. Bike lanes have recently been widened.

The written comment from Caltrans should contain the specific information from the DEIR that was used to base their decision that the additional truck traffic at interchanges 740 and 741 are not significant. Many residents and truck businesses already use the Abrams Lake interchange (Sousa Ready Mix, Solano Lumber Company, Blue Star petroleum, the transfer station, and a quarry). For the off ramp at Exit 740, traffic Engineer Tom Brohard questions posted speed vs prevailing speed as a crucial factor in the safety of traffic turning left from Spring Hill Dr. No traffic accident count, speed surveys, or evaluation of conditions in the snow for either interchange is in the DEIR.

More in depth analysis of the #2 intersection is needed because it services residents, the park, a nursery, and all businesses on Ski Village Dr. including Crystal Geyser, and the high school. No cross walks for a heavily used pedestrian intersection.

Evaluation of roadways and intersections should include snow conditions due to decreased visibility and icy conditions that increases braking distance.

Critical safety concerns exist for the two foot guardrail on the south bound lane of N. Mt Shasta Blvd. between Ski Village Dr. and Spring Hill Dr. Trucks and vehicles have hit the guard rails in the past. I and other residents have seen visual evidence. Although there is no known incidences of trucks hitting the two foot guardrail and landing on the tracks directly below, this scenario could happen (especially with increased empty trucks driven too fast by drivers unfamiliar with this area and driving in icy conditions). These tracks are designated for volatile Bakken oil trains (click on the following hyperlink for more information and a map with satellite view <https://news.vice.com/article/do-you-live-in-a-bomb-train-blast-zone>). Should a truck tip over the guardrail and land on a train carrying Bakken oil, a catastrophic explosion would occur destroying a radius of ½ mile or more which would encompass the CG and Suburban propane tanks causing further explosions. A higher barrier is imperative.

Effects on the city chip seal surface roadways should be addressed, especially with trucks using chains.

Effects of heavy truck traffic on the city park and all that is done there, small businesses on the N. MS Blvd truck route, and tourism have to be studied. Many NOP comments expressed concern and several gave examples of the negative effects of truck traffic from the previous plant.

What will the consequences be if a truck misses the CG driveway and is found in the city or residential district. Who will enforce the fines? Again, many NOP comments site the negative effects of trucks that missed the driveway or turned too soon on residential streets.

How will truck traffic be handled if trucks are backed up due to I5 highway closures from snow, accidents, or natural disaster?

More analysis of the Crystal Geyser driveway access is needed: is the driveway adequate for two lane truck traffic?

Impact on residents' quality of life due to truck noise and noxious odors, especially at night must be evaluated.

I find the mitigations to be few and weak:

CG “directing” the contracted hauling trucks to use the CG driveway. No enforcement mentioned.

A sign to indicate where the driveway is as the only means to inform truck drivers. This did not work with the last plant.

Having some unknown entity remove the brush at intersection #1 to enhance visibility.

I will use the 8th objective in the DEIR to justify many of the following necessary mitigations:

To create new employment opportunities for local and nearby communities, promote sustainable economic development, provide for adequate services and infrastructure to support the project, and contribute to the county tax base.

Widening of the road and a left turn lane for the CG driveway so traffic will not be blocked and the driveway access will be more visible. Consideration of a right merge lane should be done. Costs will be CG' s responsibility (see objective 8 regarding infrastructure).

CG should be responsible for the upgrade of a higher barrier between the south bound lane of N. MS Blvd and the rail road tracks between Nixon Rd and Spring Hill Dr.

A log of all truck trips daily has to be kept by CG and accessible for officials to monitor to verify that the truck trips will not be over 100 a day.

CG will be responsible for the cost of enforcing the consequences of trucks missing the driveway entrance.

Hours of trucking will be limited to 7:00 AM to 6:00 PM to limit economic devaluation of residents' property and quality of life (promote sustainable economic development). If CG states the plant cannot do that, then the alternative of no project should be chosen.

CG will be financially responsible for a share of the cost to maintain chip seal surface (infrastructure).

Intersection #2 should have left turn lanes, crosswalks, and possible right merge lanes. CG should be responsible for a share of the cost (infrastructure).

Intersection #1 has to be evaluated by a traffic analyst and modified to enhance safety (more than just cutting brush). CG will be responsible for a share of the cost. (infrastructure)

A plan must be devised to handle truck back ups and CG will be responsible to implement it. The adequacy of the CG driveway to handle two way traffic should be done. (infrastructure)

The CG Plant should not start operation until the above mitigations are completed.

OTHER SERIOUS CONCERNS

My husband and I live about ½ mile from the CG Plant, and we are on a well. The hydrology segment of the DEIR is not based on scientific facts. See the reports from the WATER experts on all these issues.

Mitigations Water:

Close monitoring and a limit on the amount of water pumped.

A system in place by Siskiyou County government for locals to complain if their wells have been effected. CG will be responsible for any monetary solution to the residents who must find a new water source.

Mitigations Waste Water Treatment:

Crystal Geyser Roxane, another subsidiary of Otsuka Pharmaceuticals, in Olancho Point, CA has contaminated the groundwater from it's ponds ("Huffington Post," 05/21/15, How a Water Bottling Plant is making the Water Crisis Worse for This California Region). Otsuka Pharmaceuticals has to be closely monitored on any WWT plan.

Mitigations Noise, Air Pollution and Lighting:

Many of the residents, including my husband and I, that surround the proposed CG Plant have been here before the Siskiyou County Board of Supervisors changed the zoning in the 1990's from woodland overlay to heavy industrial without sufficiently notifying us to question this egregious decision. We built our house in this area because of the clean air, quiet atmosphere, and visual beauty. If the plant operations negatively effects any of these qualities, and the effects cannot affectively be mitigated, the alternative of no project has be selected. We and are children should not be poisoned by the CG Plant emissions. It should not be left to Crystal Geysers and Otsuka Pharmaceuticals to decide what is significant.

Again, a county government system should be in place for residents to complain if they are being negatively effected, and CG should have to eliminate the cause. Any negative economic consequences arising from these negative effects should be the responsibility of CG to reimburse the residents.

Thank you,

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