

From: Jill Gardner
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To: Analytical Environmental Services
1801 7th Street
Sacramento, CA 95811
Attention: Ryan Sawyer AICP
E-mail crystalgeyser@analyticalcorp.com

RE:Public Comments on the Draft Environmental Impact Report Crystal Geysers
(CG) Project at Mt. Shasta, CA. 2/24/17

Dear Mr. Sawyer,
I have been a taxpaying citizen of Siskiyou County since 1991 and I have lived at my current location in Mt. Shasta City since 2000. I have several concerns about the Proposed Crystal Geysers beverage plant and how it will affect my safety, health and wellbeing, as well as the safety, health and wellbeing of my fellow citizens. My concerns and proposed mitigations are listed below by category.

Traffic Impacts:

I live on Caroline Av. in Mt. Shasta city. When I intend to access I-5 north from my home, I head north on Mt. Shasta Blvd. to the freeway interchange at Spring Hill road, thereby coming into direct contact with the affected traffic area proposed by CG.

4.11 Transportation and Circulation

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Study Area Intersections

Five study intersections within the City and the County were selected for analysis, based on surveys of existing (2016) traffic in the area and the traffic added by the Proposed Project

1. Abrams Associates conducted **traffic counts** at study area intersections from 7:00 to 9:00 AM and from 4:00 to 6:00 PM at the **beginning of June 2016**, when local schools were in session. Peak hours were selected based on the highest one-hour volumes recorded during each of the two-hour counts conducted. For this analysis, AM peak hour is defined as 7:45 to 8:45 AM and PM peak hour is defined as 4:15 to 5:15 PM.

In the above description it appears that the only study of current conditions undertaken was a 'traffic count', which does not take into

account the combination of multiple traffic hazards that exist at this intersection. The DEIR completely failed to consider the added dangers of ice and snow, the blind curve, the train crossing, pedestrians present, and the City Park entrance, thereby **disregarding my comments on the NOP (Appendix B.17-21) received on Dec. 1st,2014, as well as my comments spoken verbally into the public record at the public scoping meeting on 7/20/2016.** I have once again outlined my specific concerns below and demand that a serious and comprehensive study be undertaken and the feasible mitigations I have proposed be completed before the project is allowed to continue.

I bring to your attention the intersection of N. Mt. Shasta Blvd. at Nixon Rd. and Ski Village Drive. This 3-way intersection is known to be tricky one as it has a blind curve and becomes icy in the fall, winter and spring. Drivers coming off the Interstate heading southbound into Mt. Shasta are often going too fast into the blind curve where suddenly they can encounter cars, pedestrians and bicycles entering and exiting the Mt. Shasta City Park at Nixon Rd., and at Ski Village Drive.

According to Crystal Geysers, fifty of their trucks per day will move along North Mt. Shasta Blvd. from CCDAs Water Court northbound to the 1-5 interchange and back again (*a number which has doubled on record since the beginning of this project). Additionally, C.G. employee parking will be accessed on Ski Village drive, which will add to vehicle congestion during shift change.

To complicate matters, the train goes right across Nixon Rd. at that location many times a day and night, creating a noise barrier and blocking traffic that is turning into the City Park and Nixon Rd. for at least to 10 minutes at a time. Add 100 CG trucks per day passing by, plus CG employees accessing Ski Village Drive and you have a perfect storm for serious damage to life and limb. A significant and potentially fatal incident seems just a matter of time.

The language in the DEIR states the traffic impact is "Significant and Unavoidable". Clearly this is a very 'significant' impact, however, the idea that it is 'unavoidable' is not only false it is dangerously irresponsible.

Mt. Shasta City Park is a center of community activity. It is used year around for events of all kinds; ongoing classes, the senior lunch program, summer camps, winter balls, festivals and concerts, weddings and wakes, and now City Council meetings, too. The Headwaters of the Sacramento River located there are one of the prime tourist destinations in town. Crystal Geysers' use of our roads for their profit should not compromise the health and safety of our citizens and visitors as we access our city park.

Proposed Mitigations:

In order to ensure the safety of our roadways, Siskiyou County, Mount Shasta City must require the following feasible mitigations to be completed and paid for by Crystal Geysers before they are allowed to begin operations in Mt. Shasta:

1. A dedicated left-turn lane from northbound Mt. Shasta Blvd into Nixon Road/City Park
2. A dedicated right-turn lane from southbound MS Blvd. into Nixon Rd./City Park
3. A dedicated left turn lane from southbound MS Blvd to Ski Village Dr.
4. Additional visible signage and flashing lights for the approach to the intersection.
5. Safe pedestrian access and crosswalk to Nixon Rd./City Park
6. Flashing lights and signage at the intersection of CCDA Water Court and Mt. Shasta Blvd.
7. Ongoing maintenance and repair of N. Mt. Shasta Blvd from CCDA water court to Interstate 5, as well as the Abrams Lake overpass road since these roads will be directly impacted by the extra weight of CG trucks daily.

Air Quality Impacts:

I live within a half mile from the CG plant and as a person who suffers with asthma, I am concerned for my health. In fact, much of Mt. Shasta City's residential area, the hospital, senior housing, 3 public schools, both Mt. Shasta City Park and Shastice Park, and the downtown Mount Shasta area are all within 1 mile of the plant. This makes the air pollution from this proposed use especially impactful not just on my health, but on the health and wellbeing of many, many Mt. Shasta citizens.

We are told fifty large diesel trucks per day will be entering and then exiting the plant. Additionally, there is a propane generator on site for power generation. These add significant pollutants to the air we breathe.

The negative impacts on air quality of the proposed Crystal Geysers bottling plant are a significant concern.

Proposed Mitigations:

1. Trucks servicing CG should not be allowed to idle for any extended periods over 5 minutes, either at the plant itself or anywhere around the plant, or in town. This should be enforceable by citation and fine, with fines increasing for repeat offenders. There should be a mandatory monitoring system in place to make sure this mitigation is enforced.
2. The propane generators must be taken offline as a primary energy source (and only used as emergency back-up) as soon as the Lassen

Substation, currently being upgraded by Pacific Power, is online and providing electric power to the plant.

Water Quality Impacts:

The DEIR sections (4.8) dealing with what is in the wastewater for the proposed Crystal Geysler beverage plant are vague and misleading, with a serious omission regarding the potential for Chlorinated Volatile Organic Compounds.

Specifically, Industrial Rinse Water is said to include several components (listed below), however their actual constituents are not defined in this document leading to an incomplete analysis of the as facts:

- Filter backwash: actual constituents not defined
- Bottle rinse process: actual constituents not defined AND contradicts CG statement that they will use a dry, aseptic system instead of bottle rinse.
- Floor wash: actual constituents not defined AND floor wash is not currently permitted into the leach field by the Regional Water Quality Control Board, and must go into city sewer.
- ETC: implies more substances however actual constituents not defined

Industrial Process Water claims to contain:

- Cleaning agents*
- Boiler Discharge: constituents not defined
- Cooling Tanks: constituents not defined
- Etc: implies more however actual constituents not defined

*A claim is made that all the organic components in the cleaning agents - from the 'clean in place' water in the industrial process water - for the juice and sparkling waters are food-grade, implying industrial process water is safe for the leach field.

In a GLARING OMISSION from this DEIR, there is no discussion of reactions between single compounds when combined into industrial process water, such as bleach/chlorine combined with organic compounds. Many of these separate components are highly reactive, and when combined, can create Volatile Organic Compounds, and Chlorinated Volatile Organic Compounds. Both are dangerous pollutants and the latter is on the list of Priority Pollutants and cannot be legally added to wastewater.

CG claims that the wastewater coming out of their on-site treatment plant is legally clean enough to drink, implying it is safe for the leach field, even though the DEIR shows significant increases in concentrations of Sodium, Chloride, concentrated oxygen, total dissolved solids, and sulfate. See appendix H. this is at odds with California's State NonDegradation Policy. **Specifically,**

“maximum benefit of the people” is traded for maximum profit of the corporation. That is both unacceptable and illegal.

4.8 Hydrology and Water Quality

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As shown in Table 4.8-3 and 4.8-4, the estimated concentration of constituents in the industrial process wastewater effluent generated by the Proposed Project under Wastewater Treatment Option 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. Therefore, although the resulting concentration of constituents in shallow groundwater is higher than existing conditions, the impact to water quality would be less than significant. Further, prior to discharge into the leach field under Wastewater Treatment Option 3, a modified WDR would be obtained from the CVRWQCB which, similar to the current WDR permit, would include monitoring and reporting requirements to ensure impacts to groundwater quality are minimized. Potential impacts to groundwater quality from the disposal of industrial rinse and process wastewater generated by the production of sparkling and flavored water under Wastewater Treatment Option 3 would be, therefore, less than significant and no mitigation is required.

State Nondegradation Policy listed in section 4.8-14

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In 1968, as required under the federal antidegradation policy described previously, the State Water Board adopted a nondegradation policy aimed at maintaining high quality for waters in California.

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:

a. 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.

b. 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 previous description of the proposed CG project (4.8-23) also is inconsistent with the County of Siskiyou Conservation Element of the General Plan, Objective H, **policy H-3 below:**

4.8 Hydrology and Water Quality

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County of Siskiyou Conservation Element

The County of Siskiyou General Plan was adopted in 1980 and was last amended in 1997.

The conservation plan was authored in June of 1973. The General Plan serves as the overall guiding policy document for conservation within the County. The General Plan goals and policies related to water resources are included below:

Conservation Element Objective H

To preserve the quality of the existing water supply in Siskiyou County and adequately plan for the expansion and retention of valuable water supplies for future generations and to provide for a comprehensive program for sustained multiple use of watershed lands through reduction of fire hazards, erosion control, and typeconversion of vegetation where desirable and feasible.

Policy H-1

Provide for the safety and welfare of the residents of the county by flood control efforts on a regional scale.

Policy H-3

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.

Policy H-6

Utilize latest scientific techniques towards reclamation and recycling of wastewater.

Policy H-7

Use of watershed or recharge lands for urban or second home purposes should be permitted only under rigid controls

Proposed Mitigations:

1. CG must clearly define and make available to the public ALL actual constituents and chemical compounds that make up Industrial Rinse water and Industrial Process water to be added to leach fields and/or irrigation so they can be fully evaluated and determined safe by a CA state governing body before being added to any such leach field in order to comply with the CA State NonDegradation policy.
2. A mandatory study of the effects of combining the 'food grade' compounds with 'Cleaning agents' in the industrial process water from juice and sparkling beverages to ensure no reactions can occur to create Chlorinated Volatile Organic Compounds. The results must be available to the public and mitigations must be enforceable by law as required by the CA State NonDegradation policy.
3. Install a wastewater recycling system to deal with wastewater CG claims to be safe for drinking, for domestic use at the plant, as well as for cooling, rinse water, etc. thereby reducing the amount of water added to leach field, amount of water pumped from wells, etc. which would be consistent with the **Siskiyou County General Plan (4.8) Conservation Policy H-6 (above): "Utilize latest scientific techniques towards reclamation and recycling of wastewater."**

Hydrology Impacts:

According to the DEIR the impacts to local hydrology is not significant and no mitigation is required. The draft report claims falsely that multiple hydrology studies were used to evaluate the hydrology. In fact, the multiple studies cited (Geosyntec 2014, Geosyntec 2012 and Source Group 2005) all rely on one source: the SECOR study from 1998. According to scientific evaluation of the hydrology reports in Appendix B it is stated that the theoretical analysis in the studies used offers no new data and are '**oversimplified and not appropriate for volcanic regions**'.

This leads to the obvious conclusion that the hydrological impact is unknown and further studies are needed to ensure the true extent of the hydrology is understood before Crystal Geyser, or anyone, is allowed to proceed further with massive commercial extraction, potentially harming the volcanic aquifer that Mount Shasta city residents rely on for drinking and domestic water use.

Additionally, according to the mitigations from the 2001 permit for Dex 6 well, Dannon was required to import 60-65% of their water from Mossbrae springs in Dunsmuir. Pumping 100% of this water now from Dex 6 is an entirely new use, and not passed on from Dannon's use permit.

Proposed Mitigations:

These hydrology mitigations should be mandatory, paid for by Crystal Geysers, and enforced by law to ensure that the public interest is served before private profit regarding the groundwater and spring water that supplies local residential wells and Mt. Shasta city water supply:

1. mandatory monitoring of all current wells (Dex 6, Dex 3A, Dex 1) and all future wells.
2. Monitoring results are made publicly available
3. Mandatory monitoring of nearby residential wells, data also made public.
4. Impose enforceable limits/caps on extraction if problems are detected in groundwater/spring water supply.
5. Immediate shut-off or slow-down of extraction if problems are noticed at local, residential wells.
6. A mandatory sustainability study with public reporting of results paid for by CG to determine the long-term impact of high volume water extraction from this volcanic hydrology.

Sincerely,

Jill Gardner
February 24, 2017