

February 21, 2017

Ryan Sawyer
Analytical Environmental Services
1801 7th Street
Sacramento, CA 95811

Re: Crystal Geysler Bottling Plant Project DEIR

Dear Mr. Sawyer:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Crystal Geysler Bottling Plant Project. As a Mount Shasta local and scientist, I have several concerns about the impacts of the project. I have the following comments relating to the DEIR:

The analysis of construction noise in section 4.10 of the DEIR is inadequate. Estimated construction noise levels are provided as maximum noise levels, and are not comparable to the thresholds of significance used for the noise analysis provided on page 4.10-18 of the DEIR. City of Mount Shasta noise standards are provided as average (L_{eq}) and day-night average (L_{dn}) noise levels. Siskiyou County noise standards are provided as day-night average (L_{dn}) noise levels. The noise section should be revised to include predicted construction noise levels using noise descriptors that are comparable to local standards and the DEIR should be recirculated.

Construction noise levels are calculated using maximum noise levels of only one piece of equipment operating at a time. It is likely more than one piece of equipment would be used (or would have been used during un-permitted construction activities) at one time, resulting in a higher combined construction noise level. Noise estimates should be recalculated using the likely combination of construction equipment that was used or will be used to fully analyze construction noise impacts. Again, revised construction noise levels should be provided as average or day-night average noise levels. The DEIR should be revised and recirculated for public review.

The statement that noise levels generated during construction would be lower than existing ambient noise levels at the project site on Page 4.10-21 of the DEIR is misleading and incorrect. This statement was based solely on maximum noise levels. Ambient noise levels are not usually characterized solely by maximum noise levels. Ambient noise levels are better characterized by average (L_{eq}) noise levels or day-night (L_{dn}) noise levels. Although maximum noise levels upward of 70 dB were measured at the site during noise measurements, average noise levels at the site ranged from 44 to 51 dB L_{eq} (average) and 55 to 61 dB L_{dn} (day-night average). The measured maximum noise levels may have only occurred for a fraction of a second (Could have been a train horn, something bumping the noise meter, etc.). Maximum noise levels from construction equipment would occur for the entire time that equipment is operating (up to 10 hours/day) The noise analysis should be revised to remove this misleading statement and the

DEIR should be recirculated. Again, construction noise levels should be provided in L_{eq} or L_{dn} so that they are comparable to ambient noise levels and local regulations, and the level of impact should be re-analyzed.

The production well for the plant is not discussed in section 4.10 of the DEIR. The noise analysis does not analyze any noise or vibration that could be caused from the production well. The noise analysis should be revised to include any potential noise impacts from the operation of the production well and recirculated for public review.

The noise analysis applied an offset of up to 20 dB to operational noise sources at the project site from intervening buildings and topography. Please provide the source or study that justifies using a 20 dB offset.

Operational noise levels were estimated using reference noise levels for equipment that would be used during project operation. Appendix E of the Noise Analysis (Appendix T of the DEIR) contains the reference noise levels used but does not indicate the source of where the reference noise levels came from. It is not possible to determine if the reference noise levels are from equipment comparable to project equipment. The DEIR should be revised to provide the source of the reference noise levels for mechanical equipment provided in Appendix E.

On page 4.10-16 of the DEIR it is stated “Additional equipment associated with water bottling, flavoring, packaging, etc., will be located within the interior of the facility. Due to the noise reduction provided by the insulated building shell, noise generated by equipment located within the building is predicted to be inconsequential relative to equipment located at the exterior of the structure.” There is no evidence to back-up this statement. The noise analysis should be revised to provide a study or source to prove that interior equipment would not be audible outside of the building. The DEIR should be revised and recirculated with this information.

Given the controversy surrounding the groundwater use of the project, the inadequacy of the analysis of impacts to groundwater in Section 4.8 of the DEIR is surprising. The DEIR only included a brief qualitative analysis and incorrectly used previous pumping activities as the baseline for measuring the project’s impacts to groundwater. Simply stating that the project would pump less slightly less water than the former plant, and inferring the former plant did not significantly lower groundwater levels is not an adequate analysis of project groundwater impacts.

According to Section 15125 of the 2016 CEQA Guidelines, an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published. The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. However, the two-paragraph analysis of project groundwater withdrawal impacts to groundwater supplies starting on page 4.8-25 of the DEIR utilizes the period of former plant operations as the baseline for groundwater impacts. The analysis should be revised to analyze groundwater impacts based upon the conditions at the time when the NOP was published and when no groundwater withdrawal was occurring. The DEIR should be recirculated with this revised

analysis. This is especially important when determining impacts to groundwater due to extreme drought conditions in the area in recent years.

The analysis of impact 4.8-2 is also lacking a significance criteria or threshold of significance for which to determine whether the project will have an impact to groundwater. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect will normally be determined to be less than significant. The DEIR should be revised to include measurable quantitative levels of significance for project impacts to groundwater.

Section 4.8 of the DEIR should be revised to describe the current groundwater conditions, present a significance criteria or threshold of significance at which groundwater withdrawal would be considered significant, and determine if groundwater use of the project would be above or below the significance threshold. The DEIR should be revised to include this information and be recirculated.

Once a scientifically adequate threshold of significance is determined for project impacts to groundwater supplies or adjacent users, A Mitigation Monitoring Plan should be adopted for the project to avoid significant environmental impacts. To ensure the project would have a less-than-significant impact, the Mitigation Monitoring Plan should include monthly monitoring of groundwater levels of the aquifer to ensure that the project does not cause the aquifer to dip below the level that is determined to have a significant impact to groundwater supplies or recharge. If groundwater levels drop below this pre-determined level, project groundwater withdrawal should cease.

Thank you again for the opportunity to comment on the DEIR for the Crystal Geyser Bottling Plant Project. Please mail responses to my comments directly to W.A.T.E.R. prior to the Planning Commission hearing on the project.

Sincerely,

Kristine C. Jones