

February 25<sup>th</sup>, 2017

Ms. Ryan Sawyer AICP  
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RE: Proposed Crystal Geyer Bottling Plant Project

Comments on Draft Environmental Impact Report (State Clearinghouse No. 2016062056)

Attention: Ryan Sawyer AICP and Siskiyou County Board of Supervisors

This is a formal letter in response to the Draft Environmental Impact Report on the Crystal Geyser Bottling Plant Project in Mount Shasta, California. I am a Siskiyou County resident of 16 years, a Registered Public Health Nurse, owner of a local Cabinet Shop business, and moved to this pristine alpine charming town to raise my three children. We are active in our community with coaching for the Mt. Shasta Ski and Snowboard team and are outdoor enthusiasts in hiking, kayaking, and fishing. Our local economy is largely supported by the tourist industries, and recently voted "most charming ski town" by TripAdvisor.com, a major travel booking Internet site.

I spoke at the scoping meeting held at the Sisson Elementary school gym during the public comment intake period in relation to this project EIR process. I had several comments that were not addressed in the draft EIR such as

- A complete study of local well conditions to investigate and determine how many residential wells required reestablished in the past 5 years due to losing water supply in the surrounding area, such as a 20-mile radius of the Crystal Geyser factory. I stated, in 2015 two of my direct neighbors in the Shasta Uplands Quail Hill subdivision had to obtain a new well site as a result of losing their water supply. I expressed that I was concerned about losing my own residential well water supply if a major water extraction factory began operations in our volcanic aquifer.

- I requested that the EIR consider the Headwaters spring source water in regards to evaluate how many people rely on this as a primary drinking water source. The Headwaters is located in the City of Mount Shasta Park, that is in close proximity to the Crystal Geyser factory. I commented that there are large volume of people at the headwaters gathering water on a steady rate and often a wait time to obtain water from this revered spring site. As use of an industrial leach field in close proximity to the Headwaters Spring has a direct risk of pollution.
- I request that the fact that Mount Shasta is a volcano to be Included in the EIR as this ground water extraction process has the potential to impact a volatile natural process, related to the fact Mount Shasta is dormant volcano next to Mount Lassen, which is in the active chain in the ring of fire. There is limited study of volcanic aquifers in relation to the role water plays in keeping a balance of dormant mountains.

I was unable to locate any data that was a response to my comment addressed in the draft EIR and await answers to my legitimate questions and concerns.

I attended a meeting and was giving a overview of the draft EIR and have several areas of concern.

**Proposed Operations 3.5.1** states projected 100 semi-trucks trips and 181 employee vehicle trips a day to the receiving entrance on Nixon Dr. and North Mount Shasta Blvd. Is a significant increase to the traffic volume in this area. I am requesting additional studies that take into consideration impact on local roads, use of tire chains traction during incremental weather, projected air pollution due to emission during idling. Additionally The EIR should evaluate bicycling and pedestrian foot traffic in the City limits and proximal areas of possible impact. Currently there is a narrow shoulder, consistently parked cars used by nearby business and a limited inconsistent sidewalk leading north from the City of Mount Shasta on the right side of Mount Shasta Blvd. Residents wanting to utilize foot traffic routes to reach the Mount Shasta City Park must cross the truck entrance of the Crystal Geyser plant. The foot traffic route then continues to travel north, where the side walk ends and people must then cross Mount Shasta Blvd to access the entrance of the Headwaters City Park. Currently there is no cross walk on Mount Shasta Blvd and the bike path is narrow both of which create a hazardous safety issues. With the additional increase in 100 semi truck trip traffic related to Crystal Geyser plant operations in this area I request the EIR conduct further extensive study and with additional consideration of peak impact times such as events and festivals taking place in the City Park. Furthermore I would like additional evaluation of the truck route as when using the North Mount Shasta Exit traveling south on Mount Shasta Blvd there is a significant down hill slope, a right curve and tall trees on the right side of the road that creates potential high risk, due to limited line of sight and the high traffic area associated the entrance to the Headwaters City

Park. I have personally witnessed accidents in this congested traffic area due to limited line of sight, as evident by being on scene and the driver stated “didn’t see the car and was not able to stop in time”. Given the heavy weight load and high volume of the plant operation semi-trucks, I feel all intersection on the “suggested” truck routes needs further evaluation and risk assessment, to include all possible weather conditions such as icy alpine roads common to our region during winter months.

**Noise and Vibration 4.10.2:** Truck noise will change the quiet town atmosphere as sound travel great distance through the small high alpine Valley. I currently live approximately 600 feet gain in elevation above the City of Mount Shasta on Uplands Road on the west slopes of Mount Shasta and can hear the train traffic to the degree it startles me at times and I can clearly hear football games and concert in the park 2 miles away. Semi-trucks often use a Jake brake coming down slopes such as the long hill on North Mount Shasta Blvd and request a formal ban of the use of this very disruptive braking method from all Crystal Geyer transportation trucks starting from the exit from I-5. I request the EIR conduct further evaluation of noise pollution based on the unique topography of our steep mountainous valley.

**Project Description 3.6** I made note on several locations throughout the draft EIR the term “water bottling” used to describe the plant operations at the Mount Shasta Crystal Geyer plant, which is not a correct statement and at this time I am making a formal request to have this language struck out or corrected based off the fact this factory will not be bottling spring water rather producing juices, teas, and sparkling flavored beverages, which is a heavy industrialized manufacturing process.

I formally request that several provisions, considerations, and further studies be added to the final EIR,

1. If additional production lines, buildings or equipment to be added by Crystal Geyer factory, a new full EIR would be required.
2. **Proposed Operations 3.5.1** and transportation trucks be limited to hours of operations. For example from 0700 to 1900, related to direct impact to the area surrounding the Crystal Geyer factory which is close proximity to residential neighborhoods, churches, parks and recreational area of Spring Hill.

3. **Aesthetics 4.1.2** Scenic quality of the Crystal Geyer factory when driving on Ski Village Drive is currently out of complacency with the 1998 Mitigated Agreement between Siskiyou County and Dannon, due to it being highly reflective building and roof appliances, fully visible through the metal fencing, and lacks adequate vegetation to blend it into the surroundings dense green conifer forest lands of Mount Shasta. (See photo 3) I can see this factory compound from most popular hiking trails, such as Black Butte, Mount Eddy, Castle Crags State Park, and Mount Shasta which draws thousands of outdoor enthusiasts to these popular scenic tourist attractions. I would request the final draft of the EIR to include specific mitigation to address these current and future issues the Crystal Geyer plant in Mount Shasta impacts on our pristine alpine visual appearance. As noted in the draft EIR, Views of the Project Site, "The project site can be viewed from various recreational areas at higher elevation points along the southwest slopes of Mt. Shasta, thus can be seen within certain long-range scenic vistas of the valley, Although not a dominant visual feature". I agree that this plant is highly visible throughout the valley, but strongly disagree that this growing projected project with inclusion of a proposed solar panel field is not a dominate visual feature, rather a significant visual disturbance in the forested landscaped valley. There are limited scenic forested areas remaining in California, Mount Shasta and the surrounding valley is unique and highly prized as a tourist destination for its natural beauty and long scenic Vistas, the Crystal Geyer factory has a direct impact and is a visual disturbance. The Crystal Geyer plant is the largest building in our small rural community. I formally request that the entire building, large scale equipment, holding tanks and all roof features be painted to match the surrounding natural scape, such as forest green or brown. Additionally I request and a solid 12 to 10 foot wooded fence or concrete wall be required along the perimeters of Ski Village Drive. **Landscaping Plan 3.5.5** The vegetation landscape planted is going to take up to a decade to provide adequate shielding of this factory, and heavy annual snow depth will push vegetation down for the winter months, and commonly leads to severe vegetation and tree damage and destruction, which will not be an adequate shielding of the building from surrounding residential property and local traffic use of Ski Village Drive. I formal request my recommendations to be added as a means of mitigation to this direct impact of aesthetics to our mountain community.

4. **Light and Glare 4.1-5:** Light pollution is to be highly regulated to include defined limited hours of operation, for example the Mount Shasta park has a large light impact to our community, although it is limited to hours and days of the week these lights are utilized. I would like further evaluation of our night sky to be included in the final EIR as this is a measurable marker related to our quality of life living in a high alpine mountains range. I request to know direct lighting measurement of foot candles projected will be emitted from the entire factory location.
  
5. **Wastewater 3.5.8:** In the draft EIR there are four options for the Crystal Geysers to manage the waste water effluent from the factory. I have reviewed each option and I formally request that Option ONE (3.5.8.3), to send all discharge waste water to The city of Mount Shasta sanitary sewer, be the only means utilized, as any form of using Leach fields has a direct risk of contamination of our vital water resources. The location the existing leach fields are in close proximity to the Headwaters at the Mount Shasta City park, which is the location of where I gather our primary household drinking water from, as my residential well has hard water. I request further information related to every chemical in Crystal Geysers industrial rinse water as the language used is vague and constituents are not defined. The categorized grouping of the terms: filter backwash, bottle rinsing process, floor wash, is insufficient in that specific details of chemical composition was not given. Furthermore, the term “ect” used to describe the items listed in the industrial rinse waste water implies that additional unlisted chemicals can be put into the leach fields, and should be removed from the language in the final EIR. Floor wash rinse water is currently not included in the leach field permit from the Regional Quality Water Control Board which is currently mandated to be discharged to the City wastewater treatment plant. (WDR 0501-233)
  
6. The draft EIR needs to evaluate the chemical composition of waste water with regards to the risk of chlorine and organic compounds reacting leading to the formation of chlorinated volatile organic compounds, that are listed as priority pollutants of which are not allowed to be put into any leach field.
  
7. I spoke with a truck driver who delivered to this location during prior plant operations. It was brought up that during icy incremental weather, empty tractor trailer truck struggled and often could not climb the incline leading up to the entrance gate on CGWC Dr.. It was stated that an empty unloaded trailer simple didn't have the weight necessary to gain traction on icy snow covered driveway which lead to truck congestion backing up onto Mount Shasta Blvd.

8. **Greenhouse Gases and Climate Change 4.6:** Single use plastic bottling practices is having an increasing global impact on our soil, ocean, watersheds. Currently the practice of using single use plastic bottles for beverages is becoming unpopular as our society is progressing and striving for a carbon neutral footprint. I request as an **alternative plan** the Crystal Geyer Bottling Plant use glass, recycled plastic materials, or only bottle large sized bottles to reduce the massive carbon footprint that this production of juice, sparkling water, and tea will produce on an annual basis. As a resident of Mount Shasta I do not value the magnitude of plastic waste this proposed bottling factor will be contributing to the greater destruction and pollution on our planet.

I am grateful for Crystal Geyer Bottling plant obtaining a environmental impact report for the operations projected at the Mount Shasta factory. The consideration of comments from people who live in the Mount Shasta area is a vital component, in that we have first hand experiences of daily traffic conditions, and are the most vulnerable to the direct and indirect impacts to aesthetics, water, air, noise, and light pollution. I thank you for your time and service in evaluating the comments submitted and know that your background in environmental studies gives you the personal qualities of wanting to protect our vital ecosystems and pristine water quality.

Sincerely,

Patricia Osborn, RN, BSN, Public Health Nurse.

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