

## Crystal Geysler Bottling Plant January 2017 Draft EIR Public Comments

To: crystalgeyser@analyticalcorp.com  
From: Vicki Gold  
Subject: Crystal Geysler Draft EIR  
Sent: February 27, 2017  
Analytical Environmental Services  
1801 7th Street  
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Attn: Ryan Sawyer AICP

Dear AES Staff,

We are grateful for the EIR process but the conclusions of the DEIR are flawed in the many ways identified in the various letters from experts in the fields of traffic engineering, noise, hydrology, air quality and wastewater management. I support all of those letters submitted~each quoting page and section of the DEIR. My comments will be more general in nature involving aesthetics and quality of life. I hope they will generate some discussion of other alternatives.

I have just reviewed the letter submitted by Dan Axelrod, PhD. This letter should guide your group in understanding the complexities surrounding tapping this volcanic "area of source" of water of the Sacramento River watershed. The team has been diligently working on discovery of essential documents (SECOR study from 1998) for over three years. This most important foundational SECOR study is so fatally flawed that it alone provides adequate reason to go back to the drawing board with independent experts in hydrology.

This letter is written to encourage the eight AES employees and other consultants who have participated in preparation of this document. We know that your work is funded by Crystal Geysler Water Co/ Otsuka Pharmaceutical Holdings through the Siskiyou County Planning Department. It is a difficult task to evaluate a project for its many implications for a community and for the proponent. Maintaining independence is a challenging task. We all attempt to do our very best in our lives and in our professional work.

This is an unusual project in a special community. It presents an opportunity to think outside the box and to become sensitive to the larger picture that is often overlooked when examining a large industrial project. We have all become so habituated to segmentation, to breaking down aspects of whatever it is we are focusing on, that patterns form and we become insensitive to the overall picture. It is my hope that you will hear the words expressed in the many letters you will receive from a level of depth

of perception and understanding that perhaps is not common inspired when analyzing a project.

If you can imagine how deeply this community, our tourists and regular visitors from all over the world, feel about our special connection to Mount Shasta, you may be guided to incorporate these comments and to recirculate the DEIR with many amendments. These letters are an indication of the profound importance we attach to this project BEFORE the Proposed Project is in operation. Thus you can imagine how vigilant we will continue to be should CGWC and Siskiyou County decide to go forward with even Alternate B: Reduced Intensity.

*The concept of the designation of "less than significant impact" for most of the DEIR elements evaluated simply challenges my sense of reality.* One must ask "less than significant, to whom?" Have the experts who prepared this document visited Mt. Shasta personally to experience the beauty of our small town? The DEIR appears to maintain throughout a tone of accepting what is allowable and possible rather than what is desirable and preferable ~now and in the future. It is not written with the thought of Seven Generations. You are all invited to visit our town. You will be welcomed.

Surely if any of the executives of Crystal Geysers / Otsuka were living in Mt. Shasta they would avoid homes anywhere near the plant; likewise the decision makers and staff in both City and County government and perhaps those of you reviewing this project. The Golden Rule in its original translation is "Do not do unto others what you would not have them do unto you." Simple.

*This land was zoned "Woodland Productivity" and the county zoning code states that where there are mixed uses of residential, commercial and industrial businesses, the most protective restrictions should be imposed, not the least.* Because CGWC purchased many parcels with various potential uses, including many acres adjacent to residential areas, they must be held to a higher standard than if they were located in a solely heavy industry designated area. This is common sense. *Poor planning practices initiated years ago are long overdue for fine tuning. This is that opportunity for both the City of Mt. Shasta and Siskiyou County. If not now, when?*

*There should be a section in the DEIR for "Growth Inhibiting" as well as Growth Inducing.* Many people in the vicinity of the plant who either live there or who would consider building there, will be motivated to move or sell. It has already brought blight to the neighborhood and the opening of the Proposed Project will create additional blight. *In fact the presence of this industry in town may seriously detract from the desirability of Mount Shasta as a spiritual and eco destination.* The scars created by both Crystal Geysers plants, here and in Weed, visible from the Pacific Crest

Trail and the Eddy's are shocking to all who hike the trails. The highly reflective light colored paint used in the original construction could and should be changed.

*The DEIR fails to identify Alternate A "No Project" as the best alternative not just on the basis of environmental concerns but of socio-economic impacts as well.* It seems clear that the many mitigations required of all other options and the Proposed Project should logically lead to this conclusion if approached objectively with the heart of the community in mind. This would represent "best practices" in the true sense of the phrase. Applying bandaids to a gaping wound has been proven ineffective. The Cumulative Effects of this project are so significant that they cannot be mitigated to the satisfaction of the community.

#### **Under Alternative B, Reduced Intensity**

"Similar to the Proposed Project, Alternative B would result in the operation of a water bottling facility within the project site, however the production capacity of the Plant would be limited to one bottling line (as opposed to two bottling lines under the Proposed Project)."

"Under Alternative B operational impacts including groundwater pumping rates, energy consumption, and wastewater generation, would be identical to those resulting from the initial phase of the Proposed Project, but would be reduced when compared to full production. The plant would still operate up to 24 hours a day six days per week, depending on demand. This alternative would generate up to 50 truck trips daily (25 trucks/round trips) per day and 60 employee trips (30 employee vehicles/round trips per day)."

Although the DEIR identifies Alternate B "Reduced Intensity", it states that "no mitigation measures would be eliminated; however Alternative B would result in fewer emissions of GHG's, and thus would require the purchase of fewer California Air Resources Board (CARB) off-set credits."

"Because this alternative would result in half the number of truck delivery trips, increases in traffic noise along the segment of Mt. Shasta Boulevard between Ski Village Drive to Nixon Drive would be reduced below the significance threshold of 1.5 dB, reducing this significant and unavoidable impact of the Proposed Project to less than significant. Alternative B's contribution to cumulative impacts associated with climate change would also be significant and unavoidable, however the extent of the impact would be reduced due to the reduced volume of GHG emissions."

Alternative C: Alternative Use: Truck Terminal has multiple associated problems. They state "it would have a similar impact associated with GHG emissions as the Proposed

Project".

**Comments:**

While No Project is clearly the preferred alternative, if a very limited project is approved, then the following additional mitigations should be addressed. Limiting the production to 1 line during daylight hours is one possible mitigation as an Alternative D.

*Thus the DEIR fails to address a more limited use as Alternative D which would be one line in operation only M-F during daylight hours with no truck trips before 7am and after 6pm in the winter and 7pm in the summer.* Impacts of this alternative must be quantified under all reviewed categories as a better basis for comparison.

*There is also no discussion surrounding a mitigation of limitation of any further development of the project i.e. not allowing 2 lines or more in the future.* This would be somewhat reassuring to the community as they are aware of problems resulting from unanticipated expansion in other neighboring communities.

What you have before you to review are the efforts of citizen scientists cooperating to insure that the pristine environment that they love and respect remain as close to its natural state as possible. Tourists who frequent Mt. Shasta always comment on the beauty, and the way we, as a community, have managed to maintain the character and charm of our small tourist town. Any selection other than No Project will change the essential nature of our small tourist town.

*We must consider the cost/ benefit ratio first and foremost.* It is my contention that most people, perhaps even the corporate executives, will see that the "No Project" Alternative makes the most sense. *There are many possible alternative projects other than the one presented and those Alternate Projects both eliminated and included for consideration. The community has offered to meet with the proponents many times over the past 3 1/2 years and this has not occurred.* Again, read the letters and recognize that there is no dearth of creative talent to envision a project that would benefit both the town and the corporation. Here lies untapped potential for a cooperative venture.

*Everyone involved and responding would gladly and gratefully confer with the Otsuka/ Crystal Geyser executives to come up with a better use of the land and structures. This has the potential to evolve into a landmark case illustrative of a change in relations between industry and community. Few small towns have the talent, dedication and creativity present among the residents who have chosen Mount Shasta for their home.* To not meet with us is a huge opportunity lost for all concerned. There is still time.

This is a matter of values, ethics, morals, of enlightened self interest. Water is Life. This is

a volcano and consequences of unlimited extraction of water has not been studied. Global warming is a fact in spite of the 2017 winter surprise in Northern California. There is no way to properly mitigate extraction of water from an unstudied aquifer supplying residential wells and the whole Sacramento River Watershed. Water bottling in single use plastic disposable bottles is a flawed concept in principle. Our oceans and landfills bely the statistics presented regarding recycling.

There are always hidden costs associated with any development and opportunities lost for both the company and the jurisdiction(s). In this case with such a controversial project, the community seeks to understand the costs and benefits in greater depth. *Although this may not be a required element of the DEIR, in this case it is incumbent upon the consultants for the project to provide such an analysis.* Here is a short list of those factors that must be considered.

1. **Economic analysis and Hidden Costs**

- a. costs and consequences of road repairs, county, city, CalTrans
- b. loss of property values surrounding the plant
- c. loss of adequate water supply to residential wells and the fish hatchery
- d. loss of capacity at WWTP for future growth
- e. loss of revenue to Parks & Recreation because of cumulative noise and traffic impacts to city park and affecting various scheduled events
- f. loss of rental housing available in already tight rental market
- g. opportunity lost for future developments more compatible with Mt. Shasta's quality of life.
- h. evaluation of blight caused in Bakersfield and Calistoga from shutting down those plants
- i. opportunity loss for development at The Landing, Spring Hill areas

2. **Traffic and public safety**

- a. Completely re-engineering N. Mt. Shasta Blvd. from the plant to the Freeway and the Spring Hill Drive intersection.
- b. Restriction of traffic on Spring Hill Drive and all unapproved city streets with penalty: *moving violation set for trucks using unauthorized city streets.*
- c. Exploring use of area near KOA and Cross Petroleum station for turn around for any trucks missing the turn.
- d. No trucks in or out after 7pm and no truck traffic on week ends.
- e. Signage on both sides of Mt. Shasta Blvd indicating plant's driveway.
- f. Signage on Interstate 5 indicating fines for using city streets

**Background Information:**

The Hippocratic Oath: "*primum non nocere*" states "above all do no harm".

Please read our letters knowing that this is our quest. We are aware of the historic problems generated by water bottling facilities, some of them by Crystal Geysers Roxanne, a sister company sharing the same parent, Otsuka. Both the Weed and Olancho plants started out small and grew far beyond the original concept. Both communities are dealing with fallout from these ventures. We have learned from experience with Coca Cola/Dannon Waters that there are predictable and inevitable consequences to the water table, to the residential wells and the general environment.

Today the City of Weed is not thriving. South Weed was developed into a major truck stop, but truck traffic is still problematic. The Crystal Geysers Roxane plant was built in a heavy industrial area. Mt. Shasta is not suitable for this industry. It is a tourist village. We note the examples of the CGR plant in Olancho and lawsuits over groundwater contamination. To overlook these examples of supposedly clean industrial water bottling projects is not wise. We have learned from the mistakes of others. Some things simply can't be mitigated.

How much is enough? Drawing 1.5 million gallons per day in Weed just 8 miles north of Mt. Shasta would seem to be a sufficient draw on the mountain reservoir. For us to further encourage placement of deep straws into the aquifers and streams here or in McCloud would suggest failure of basic pattern recognition.

*Environmental review calls upon all of us to dig deep, to explore our roots, our feelings, our contact with Reality, with Nature.* It is easy to become bogged down in the details of a project, to dissect it into its various components. As we attempt to explore mitigations for the multiple and varied aspects that are problematic for the well being of the community, we notice that these are indicators that there is something larger to consider here. *Some projects are not meant to be. What once seemed like a good investment proves too difficult. This is the very definition of risk capital.* You are aware that we maintained and demanded that an EIR was necessary from December of 2013. Crystal Geysers executives knew to expect this because of their experience in Orland with loss of a lawsuit filed against both CGWC and the City of Orland.

A fever is a sign that one must rest and recuperate. It is an important indicator of health and comfort. This society has been trained carefully by Big Pharma to reach for a drug to mask the symptoms and to push ahead, carrying our disease into the public arena. This leads to more symptoms, followed by more drugs and an endless cycle of reactions to these drugs followed by more intervention. This unfortunately is the nature of "mitigations". It is no coincidence, perhaps that Crystal Geysers Water Company and its Mt. Shasta project is wholly owned by a pharmaceutical company.

It is the drug industry's modus operandi to identify a problem and find a solution. Yet we

must stop and ask: is there a problem? Is the corporation here to address a valid community need? What are the true costs and benefits of this project? The very first thing that should be addressed is the "why" of the project. Clearly the answer is "profit". *If ever there was a project that deserved a full economic, social and financial analysis this is that project. What price do we assign to quality of life, to purity of water, soil, air, to peace and tranquility in our small mountain resort town?*

The entire community has witnessed many recent problems with the sewer collector system during wet weather with serious impacts to groundwater, the wetlands near I-5, Lake Siskiyou and the Sacramento River. **The logical solution and most significant mitigation, if any project is to go forward, is to not allow the plant to open until the collector system has been repaired and upgraded (with CG paying their fair share of anticipated needs at full buildout) and the WWTP completed in 2021.**

3. **WWTP**

a. no project until 2021 when completed and also not until infrastructure (collector system) repaired. Fair share of this increase in capacity to accommodate their effluent at full build out.

4. **Noise**

- a. shielding on roof of all equipment; sound walls like those on freeways, with trees camouflaging.
- b. no loading of trucks except 7-7 M-F only
- c. baseline testing in winter and summer, not just summer.

5. **Aesthetics**

- a. non-reflective paint no matter what use is determined for the building
- b. vegetation, evergreen trees to shield building from all views in all seasons

The most important section is of course hydrology. Others have addressed this in detail. **The company must guarantee to pay for ongoing well studies and establish a fund to compensate the residents if there are effects on the wells on their properties? What is the value of your property with no water?**

6. **Hydrology**

- a. new full independent studies replacing SECOR's flawed and limited study
- b. unscheduled monitoring by independent qualified party monthly
- c. daily monitoring and public records of water use and testing
- d. cease operations if adverse consequences to local wells or springs

7. **Indemnification/ Insurance policy**

- a. local residential wells
  - b. city for impacts on water source Cold Springs and future sources.
  - c. Fish Hatchery
  - d. Fund for clean up of possible contamination
8. **Leach Field**
- a. Baseline evaluation for toxins full panel of all chemicals evident at prior CocaCola/ Danone and CGR and CGWC plants
  - b. no use of leach field; all effluent domestic, production, floor cleaning and rinse water to WWTP
9. **Electrical Power/Utilities**
- a. Pay for under grounding of utilities from nearest point of underground system.
  - b. No use of generators (for emergency use only).
  - c. connect to PacifiCorp's Lassen Substation if/ when completed
10. **Recycling of all plastic bottles**
- According to online statistics which refute the DEIR's claim that 78% of PET is recycled, almost 70% of PET is not recycled
- a. Recycling of all PET bottles should be provided for Mt. Shasta by CG.
11. **Land Use**
- a. Designate the acreage East of the plant for planting of evergreen trees to shield the views of the plant and to act as sound barriers.
  - b. commit to no expansion of plant footprint without EIR process repeated, not simple permitting process
  - c. Clearly residential zoned land could be used for residential housing if there were a different project. No one will want to live there if it goes forward.
12. **Air Quality/ Pollution** is unmitigable
- a. unpleasant and toxic odors and haze from diesel trucks and traffic
  - b. production of plastics with odors
  - c. production of fragrant teas
  - c. diminished use of City Park as destination for eco tourism, weddings, celebrations of life, senior nutrition.

### **Alternative Uses**

*Think outside the bottle, away from extractive water mining.* What can we create together to break this deadlock and to inspire a true win/ win situation? Have the executives considered for example, the potential value of reaching out to the community

to achieve a harmonious resolution? For example, what might result from a masterful change of direction leading to an historic Public Relations precedent of establishing a center to study volcanic hydrology and the importance of pure water flowing from the Mount Shasta areas of source? Crystal Geyser could truly be a leader. There are many other potential viable uses for the property. In fact, it could be converted into an environmental and water-oriented research and experimental center famous internationally. Our brand is significant as you know. The corporation's investment in over 250 acres of prime real estate is available for more appropriate uses. *Of course it takes courage and vision to change direction.*

*"Next to knowing when to seize an opportunity, the most important thing in life is to know when to forego an advantage." Benjamin Disraeli.* Rather than pay for damage control by hiring international Public Relation firms, CG could get out in front and innovate, imagine, meet neighbors and establish a new paradigm. Thomas Jefferson said: "Eternal vigilance is the price of freedom". In this case it is the price of quality of life.

"These days, humanity produces incalculably large amounts of data. But, as the information technologists have taught us, data is not information. And information – whatever that really is – can rarely be equated with knowledge.

In a world of splintering specialties, where a physician may focus entirely on the pituitary gland, and anthropologists are labeled cultural, physical, social, industrial, or paleo, we have largely lost sight of knowledge, and its ultimate expression: wisdom." Stanford Social Innovation Review by Mal Warwick's of Riane Eisler's excellent book [The Real Wealth of Nations](#). See link:

[https://ssir.org/book\\_reviews/entry/review\\_the\\_real\\_wealth\\_of\\_nations](https://ssir.org/book_reviews/entry/review_the_real_wealth_of_nations)

Respectfully Submitted,

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