

July 25, 2016

Greg Plucker, Director  
Siskiyou County Community Development Department  
806 S. Main Street  
Yreka, CA 96097

**SUBJECT:** Comments in Response to the Notice of Preparation of an Environmental Impact Report for the Crystal Geyser Bottling Plant Project

The City of Mt. Shasta has reviewed the June 24, 2016, Notice of Preparation (NOP) issued by Siskiyou County regarding the Crystal Geyser Bottling Plant Project. The project site abuts the City of Mt. Shasta municipal limits, is within the City's sphere of influence, and is within the City's municipal sewer system service area boundary. The proposed project consists of modification and operation of the bottling facility previously owned by Dannon/CCDA Waters. The facility currently includes a 145,000 square-foot building, a domestic well and pump house, a ±228,000-gallon fire suppression tank, a deep groundwater production well, storm water detention basin, parking areas, and truck delivery entrance and roadway extension from Mt. Shasta Boulevard. Proposed modifications include addition of a caretaker's residence, a second propane storage tank, generators, and offsite sewer and electrical lines.

Crystal Geyser would initially operate one bottling line and would ultimately expand to two lines. The facility would initially employ about 30 people, expanding to 60 employees with two bottling lines at full production. Water usage would average about 80 gallons per minute (gpm) with one production line and 150 gpm with two production lines. Three general categories of wastewater would be generated: domestic wastewater, estimated at 300 gallons per day for each bottling line; industrial rinse water, with each bottling line generating approximately 5,000 gallons per production day (gppd) with infrequent peaks up to 25,000 gppd; and industrial process water, with each bottling line generating about 20,000 to 54,000 gppd. At full production, the facility would generate about 50 truck trips and 120 employee vehicle trips per day.

Project alternatives being considered in the EIR include discharge of industrial wastewater to the City's wastewater treatment plant (WWTP). This would require issuance of an industrial wastewater permit by the City of Mt. Shasta. In this case, the City would serve as a Responsible Agency pursuant to the California Environmental Quality Act (CEQA). As a Responsible Agency, the City offers the following comments regarding wastewater collection, treatment, and disposal. In addition, the City has a statutory responsibility to protect the health, safety, and welfare of its residents; in this role, the City offers additional comments on aspects of the proposal that may affect City residents. These comments pertain to traffic and circulation, noise and vibration, nighttime lighting, water supply, and fiscal impacts. Finally, two recent City projects have had ties to the proposed Crystal Geyser project: (1) the recently approved State-Mandated Wastewater Treatment Plant and Outfall Improvement Project and (2) the U.S. Economic Development Agency (EDA)-funded Mount Shasta Sewer Line and Wastewater Facilities Improvement Project (also

known as the Interceptor Pipeline Project), which was essentially terminated by **January 2015**. Both projects generated a substantial number of comments that have bearing on the proposed Crystal Geyser Bottling Plant Project; these comments are provided on the enclosed CD.

#### Wastewater Collection, Treatment, and Disposal

As described in the NOP, several options for discharging wastewater from the bottling plant will be considered in the EIR. Under each alternative, domestic wastewater would be discharged to the City of Mt. Shasta's municipal sewer system. With respect to industrial wastewater, (1) both rinse water and process water may be discharged to the City's system, (2) process water may be discharged to the City's system, but not rinse water, or (3) no industrial wastewater may be discharged to the City's system.

If industrial wastewater is to be discharged to the City's system, the discharger must first obtain an industrial wastewater discharge permit from the City of Mt. Shasta. Crystal Geyser has submitted a permit application to the City. The City's engineer is currently reviewing the application and drafting the permit. The permit will contain conditions regarding the quantity of wastewater that may be discharged to the City's system, the composition of that wastewater, wastewater monitoring and reporting requirements, and related conditions. To ensure that the public and regulatory agencies have the opportunity to comment on the permit requirements as part of the environmental review process, we request that the draft industrial wastewater discharge permit be included in the Draft EIR.

As noted above, the City recently approved an Initial Study/Mitigated Negative Declaration (IS/MND) addressing replacement and expansion of the City's WWTP. The document recognized that Crystal Geyser could ultimately discharge up to 150,000 gallons per day to the WWTP, which would necessitate additional expansion of the WWTP. The IS/MND did not document any significant adverse unavoidable environmental impacts associated with increasing the capacity of the treatment plant to handle the Crystal Geyser discharge. The results of the IS/MND, as well as PACE Engineering's *Preliminary Engineering Report and Feasibility Study* (PER) referenced in the IS/MND, should be reviewed and incorporated into the County's EIR, as appropriate.

In addition to creating greater demand for wastewater treatment, the proposed Crystal Geyser discharge could exceed the capacity of the City's sewer collection system, and affect the City's disposal practices. With respect to wastewater collection, new or replacement collection mains would be needed to serve the bottling plant. We request that the EIR address the offsite sewer main improvements, including alternative sewer main routes. Establishment of optional sewer main routes should be conducted in consultation with City staff.

The PER and IS/MND also confirmed that the additional wastewater volume generated by Crystal Geyser could be discharged at the City's existing discharge points. However, the additional volume will increase the need for the City to pump treated effluent to its leachfield, which will increase energy consumption and add to the City's disposal costs.

### Traffic and Circulation

With implementation of the proposed project, additional vehicles would be added to North Mount Shasta Boulevard, a primary arterial road in Mt. Shasta, and to Ski Village Drive, a collector street. To ensure that development does not exceed road capacities, Policy CI-1.2 of the City's General Plan Circulation Element requires a level of service "C" (not to exceed 12,000 average daily trips for a 2-lane arterial, or 9,000 average daily trips for a 2-lane collector) be the minimum acceptable service level during normal roadway conditions. Peak-hour reduction to level of service "D" (or 13,500 average daily trips for a 2-lane arterial, and 10,500 average daily trips for a 2-lane collector) is permitted provided there are plans in place to make improvements required to improve the level of service. As part of the traffic and circulation analysis prepared for the EIR, City traffic standards must be considered to ensure that traffic on City streets operates at an acceptable level. We request that the traffic study also provide a sufficient analytical basis to identify/recommend appropriate mitigation measures as well as to allow establishment of fair-share impact fees to be paid by Crystal Geysers to the City to offset traffic and circulation impacts.

### Noise and Vibration

The proposed project site is located adjacent to several residences located within City limits. We request that an acoustical study be prepared in accordance with the standards provided in the City's General Plan Noise Element. In particular, pursuant to Policy NZ-1.1, we request that the Crystal Geysers project incorporate appropriate noise attenuation into the project design to achieve compliance with the standards presented in Table 7-5 of the Noise Element (in general, noise levels in residential outdoor activity areas should not exceed 50 dBA  $L_{eq}$  during the daytime period or 45 dBA  $L_{eq}$  at night; indoor noise levels (day or night) should not exceed 35 dBA  $L_{eq}$ ). Likewise, evaluation of the effects of transportation-related noise level increases on City residents must be included in the analysis.

The City also requests that the extent, duration and effects of vibration due to project activities be addressed in the EIR. Local residents have stated that they experienced vibrational noise during previous plant operations. Because the City General Plan does not provide standards for exposure of residents to vibrational noise, we request that the EIR identify an appropriate threshold of significance for such exposure.

### Nighttime Lighting

The City of Mt. Shasta is located in an area of substantial scenic variety and beauty. Policy OC-7.1 of the City's General Plan Open Space and Conservation Element is intended to "promote the protection of the scenic beauty of the Mt. Shasta area through appropriate zoning, development standards, and the development review process involving lands in both the City and outside the city limits. The County is encouraged to support and help implement this policy." Further, as stated on page 5-28 of the Open Space and Conservation Element, one of the three "biggest threats to the loss of scenic quality in the hills around the City of Mt. Shasta is the introduction of glare and lights at night in areas that are naturally dark." As part of the light and glare analysis prepared for the EIR, analysis specific to nighttime lighting and glare is needed to provide assurances that additional sources of light and glare would be minimized through implementation of best management practices to prevent light spillover to adjacent properties.

The City of Mt Shasta Municipal Code Section 18.70.120 provides detailed standards for outdoor lighting; Chapter 8.52 provides standards for sign illumination. We request that these and other applicable standards be incorporated into the proposed development to ensure that City residents are not exposed to excessive nighttime lighting or glare.

#### Water Supply

In addition to its spring-fed water source, the City's municipal water supply is provided in part by groundwater wells. As discussed in the City's Master Water Plan, a future well site has been designated in the vicinity of the Crystal Geyser facility; we request that the EIR include a comprehensive hydrologic study sufficient to evaluate potential impacts of the proposed project on existing and planned municipal wells.

#### Fiscal Impacts

The proposed project could result in direct and indirect costs to the City of Mt. Shasta associated with wastewater collection, treatment, and disposal; we anticipate that these costs can be covered through payment of industrial wastewater connection fees by Crystal Geyser. However, the City has no direct mechanism to be reimbursed for other costs. Such costs may be related to the need for road maintenance and improvements, additional demand for municipal park and recreation facilities generated by Crystal Geyser employees living outside the municipal limits, and additional demand for police and fire protection services, where City staff may serve as first responders. We request that the EIR include a comprehensive fiscal impact analysis that a cost/revenue evaluation for public services provided by the City. The potential for physical deterioration of City facilities as a result of fiscal imbalance should be identified, and measures to avoid such environmental impacts should be identified and implemented.

#### Related Comments

Public controversy has surrounded previous City projects—namely the EDA-funded Mount Shasta Sewer Line and Wastewater Facilities Improvement Project and the State-Mandated Wastewater Treatment and Outfall Improvement Project. These projects, with ties to potential future operations of Crystal Geyser, have garnered many comments from the public, in addition to comments from regulatory agencies. Many of the comments received during the CEQA process for these projects pertained to Crystal Geyser. Two large groups of comment letters exist that provide additional issue areas to aid in scoping of the EIR for the proposed project. The first group of comment letters were in response to the 2014 NOP for the Mount Shasta Sewer Line Improvements Project. The second group of comment letters were in response to the public review period for the IS/MND prepared for the State-Mandated Wastewater Treatment and Outfall Improvement Project. As noted above, these comments are provided on the enclosed CD.

Sincerely,

Parish Cross  
Acting City Manager