



Crystal Geyser Final EIR Released

On Friday, September 8th, Siskiyou County released to the public its Final Environmental Impact Report (FEIR) on the Crystal Geyser bottling plant project. Even a brief examination of the 64 pdf documents that comprise the FEIR shows that almost all of the concerns and objections of the over 150 comments submitted on the Draft EIR were inappropriately deemed to be wrong, without merit, or misconceived and given no serious response. Where a few comments were found to be “with merit,” changes were made but without an analysis of the original flaws in the Draft EIR, merely stating that these changes make the issues raised “no longer relevant.” This treatment of public comment violates the CEQA Guidelines that mandate responses are to be “addressed in detail giving reasons why specific comments and suggestions were not accepted.” The FEIR found that **no mitigations of any sort** were needed on issues of air quality, traffic effects, visual aesthetics, aquifer protection, water quality, plastic pollution or hours of operation. In addition, several mitigations from the original DEIR were modified to be less stringent.

Water Issues not addressed

The community-wide concern about water and the health and sustainability of the local aquifer was a large portion of the public comments submitted. The FEIR continues to declare that these concerns have no merit. Concrete testimonials from homeowners about actual well issues while Danone/Coca Cola operated the plant were dismissed as “anecdotal.” No mitigations, restrictions on pumping or safeguards for neighboring domestic wells are proposed in the FEIR. Unfortunately, the FEIR contains many unsubstantiated assumptions and biases in the theoretical models used to argue that neighboring wells would not be impacted. Because of past homeowner well issues, we continue to insist that only by directly monitoring homeowner wells during any and all hydro-geologic testing and during plant operation can these effects be realistically determined, monitored and mitigated.

Waste Water Treatment

The FEIR eliminates wastewater disposal Option 4, which would have allowed the disposal of on-site treated effluent via irrigation of the surrounding land. However, the County still proposes Option 3, to release to the on-site leach field the industrial process and rinse wastewater from production of flavored sparkling water without any pre-treatment other than pH adjustment. This untreated effluent, containing cleaning agents, boiler discharge, cooling tank discharge, floor wash, filter backwash and equipment rinse would percolate into our shared and pure groundwater aquifer. This option is not

acceptable under any circumstances. In the DEIR, wastewater disposal options that would send industrial wastewater to the Mt. Shasta City wastewater treatment plant were capped at a maximum of 24,000 gallons per day. The FEIR now says a maximum of 50,000 gallons per day will be allowed under certain conditions. Why is there now a softening of the cap to allow doubling of the allowed daily maximum?

Traffic Issues

Whereas the DEIR indicated that noise from truck traffic was a significant but unavoidable impact, the FEIR declares that truck traffic noise is a less than significant impact. Was this reduction in impact level because there was a reduction in truck traffic or a reduction in the noisiness of the trucks? No, it appears to have been done by taking background noise levels nearer the train tracks, so the baseline noise level would be higher, and shifting night time truck trips to the daytime, which lowers the estimate for truck noise levels (due to the way the average of day- and night-time noise is calculated). The result is that the **calculation** of the estimated noise appears to be less without actually reducing the total traffic noise nearby homeowners will experience. This manipulation of noise calculations violates CEQA Guidelines that require responses to public comment be in "good faith." The FEIR did reduce of the hours of truck loading operations to be from 7am to 10pm. While this is a much-needed change to the project, it was added with no mention of the DEIR's obviously flawed analysis that predicted no significant nighttime disturbance of residents by truck traffic.

Plastic Pollution

The issue of plastic pollution is whitewashed by claiming that no plastic is manufactured at the plant. Although the FEIR does not say how many bottles per day the plant will produce, conservative estimates based on amounts of water to be bottled indicate the plant could be processing a million or more PET bottles a day. This is a significant pollution threat! Although Crystal Geysers is expecting the consumer to be responsible for recycling their PET bottles, they are committing to only a 50% recycling rate of solid waste at the plant, reduced from 75% originally stated in the DEIR. Why the reduced commitment to recycling at their own plant?

Flaws in modeling

The FEIR contains many other major flaws, including errors in statements of fact, unsupported conclusions, and unsubstantiated choices of modeling procedures, all issues we are continuing to study. The limitations of the modeling programs used can be seen in the analysis done in the Draft EIR on noise from plant HVAC and manufacturing cooling systems. After numerous comments noting the flaws and biased assumptions, the EIR authors did **actual** noise testing of the equipment systems and found that there were significant noise problems with the plant equipment, in direct

contradiction to their previous modeling assumptions that found no significant noise effects. These new findings require stronger mitigations to lower noise emissions.

In Comments on the DEIR, W.A.T.E.R., the Gateway Neighborhood Association, lawyers, experts and many others called for the Draft EIR to be re-circulated to address many of the faults and omissions found in the draft. We again call for recirculation of the revised DEIR. The FEIR includes significant new data, analyses and alteration of conclusions, including new noise tests and calculations, a new pump test on their Domestic well #1, well pumping with accompanied hydro-geologic studies, new pavement impact studies, new green house gas calculations and additional information on chemicals used in manufacturing systems. CEQA requires recirculation of the DEIR when significant new information is added to the FEIR, otherwise there will be no opportunity for thorough review by the public. We request that the County recirculate an EIR and a new comment period be implemented! Only with this procedure can the public fully understand the accuracy and completeness of the new studies and information supplied in the FEIR.

We continue to study the entire FEIR for more issues and problems and will bring them to the County Planning Commission public hearing tentatively scheduled for September 20, at the Miner's Inn in Yreka at 9 am. W.A.T.E.R. encourages all of the concerned public to attend this hearing and voice their concerns about the many flaws and omissions still in the FEIR.

The complete FEIR documents can be obtained on the County web site at:

<https://www.co.siskiyou.ca.us/page/community-development>

(at bottom, beginning on documents tab 6)

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