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About the Author: Peter Martin earned a B.S. degree in Mechanical Engineering from Brunel University, London and an M.S. degree in Environmental Engineering from San Jose State University. He is a registered Civil Engineer in California, and holds a Grade 5 Water Treatment Operator certificate. He has over 32 years experience in the water industry, during which time he worked as a water & wastewater treatment operator, environmental engineering consultant (including leach field design), process engineer at Contra Costa Water District, and design engineer and water treatment superintendent at East Bay Municipal Utility District. He currently works as a water system operations consultant, and is an Adjunct Professor at Solano Community College, where he teaches water treatment classes for the Bay Area Consortium of Water & Wastewater Education.

17 September 2017

W.A.T.E.R.
P.O. Box 873
Mt. Shasta, CA 96067

Gateway Neighborhood Association
724 Butte Ave.
Mt. Shasta, CA 97067

Dear Sir or Madam,

I am writing this letter for We Advocate Thorough Environmental Review and the Gateway Neighborhood Association. This letter expresses my concerns about the inadequacies and inaccuracies of the Final Environmental Impact Report for the Crystal Geyser Bottling Plant Project in Mount Shasta.

I stated my concerns about the Draft EIR in a letter dated 22 February 2017. The responses to that letter, which are included in the Final EIR, are completely inadequate—either completely evading my points, or using pseudo-technical verbiage to obfuscate the issues. Thus, the comments in my letter of 22 February 2017 are still valid and have not been addressed, with the exception of those relating to Alternative 4, which is no longer under consideration.

In addition I would to highlight several glaring inaccuracies and false assumptions that have persisted into the Final EIR:

- In the Response to Comment P143-4, it's stated that "As summarized in Table 4.8-3 and Table 4.8-4, while the industrial process effluent that would be discharged on-site under Wastewater Treatment Option 3 would have a higher concentration of constituents than occurs in the existing groundwater, the concentration would nonetheless be substantially below the California MCLs for drinking water." This response is relevant for two reasons: firstly, it acknowledges that Crystal Geyser's discharges would indeed degrade the groundwater quality and, secondly, it shows that Crystal Geyser considers that degradation of the groundwater is not significant as long as California MCLs are not exceeded. This is a completely inappropriate assumption; water that barely meets the MCLs would be vastly inferior to the existing pristine groundwater quality. Any degree of groundwater degradation due to this project would consitute an unacceptable environmental impact.

- In the Response to Comment P30-14 it's stated that "Utilizing the percentage of increase in specific groundwater contaminants is not the standard method for determining impacts to water quality. Rather MCLs and and water quality standards have been identified by permitting agencies, such as the RWQCB, which are used to determine impacts to water quality from proposed projects." Percentage increases in contaminant levels are indeed commonly used to measure environmental impacts on water quality; MCLs and water quality standards are used to determine compliance, which is not the issue of concern in this case. This is an environmental impact report, not a regulatory compliance document!

- The water quality of Crystal Geyser's wastewater discharges should be compared to the quality of groundwater at the Dex6 well, not the potentially contaminated water beneath the leachfield. The purpose of the environmental report should be to determine how beneficial uses of the groundwater would be impacted by the project; the beneficial use water quality for downstream users is best represented by Dex6. Comparison with the leachfield water quality would only be appropriate if Crystal Geyser's discharges were not expected to extend beyond the leachfield vicinity, which is clearly not the case.

- In Master Response 18 - Groundwater Quality, it's stated that: "There is no known potential for chemical reactions between constituents anticipated to be present in discharged wastewater effluent under all Wastewater Treatment Options." This is an incredibly inaccurate statement. As examples, the clean-in-place chemicals nitric acid and periacetic acid would react violently with the caustic soda; the bleach would give off chlorine gas if mixed with nitric acid; the formation of carcinogenic trihalomethanes will occur with the addition bleach to the groundwater; there is also the potential for the formation of toxic trichloramine. None of these issues have been addressed in the final EIR.

Yours sincerely,