

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

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November 10, 2015

David Brockbank, Senior Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553



Subject: SCH No. 1989040415 - Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) to Amend Land Use Permit 2020-89 for the Keller Canyon Landfill, Facility No. 07-AA-0032, Contra Costa County

Dear Mr. Brockbank:

The Department of Resources Recycling and Recovery (CalRecycle) staff offer the following comments for this proposed project as part of the California Environmental Quality Act (CEQA) process. If the proposed project description below varies substantially from the project as understood by the Lead Agency, CalRecycle staff requests that any significant differences be clarified and included in the Supplemental Environmental Impact Report (SEIR).

Project Description

The Keller Canyon Landfill Company (KCLC) requested to amend the facility's existing Land Use Permit (LUP) Conditions of Approval. In 1990, the County Board of Supervisors certified the project Environmental Impact Report (EIR). Keller Canyon Landfill (KCL) has been operating since May 1992.

KCLC proposes to increase the maximum disposal tonnage from 3,500 to 4,900 tons per day (TPD). In addition to establishing a separate maximum daily tonnage of 1,300 TPD for non-landfilled materials, including 500 TPD of green waste, 300 TPD of wood waste, and 500 TPD of inert material.

The proposed project would also increase the maximum daily vehicles count from 260 to 395 and increase the disturbance area from 480 acres to 572 within the 1399 permitted boundary. The 572 acres would only be used for the supporting landfill activities such as, surveying and geologic testing, excavation and stabilization, placement of engineered fill, instrumentation, slope reconstruction, earthmoving and stockpiling of soils, vegetation restoration for the purpose of slope maintenance, landslide remediation, and grading and construction associated with storm water management infrastructure improvements.



No other changes are identified to the landfill facility design or operations. This includes no changes to facilities hours of operation, waste types accepted, permitted boundary, disposal area or maximum fill elevation.

Comments

Implementation of the proposed project will require a revision to the existing Keller Canyon Landfill Solid Waste Facility Permit. The permit action will require action by CalRecycle. As a responsible agency, CalRecycle will need to utilize the CEQA document to support its action on the permit.

General comments

The Project Background states, "other proposed operational changes." It is unclear what the "other" proposed changes will entail. The draft SEIR should describe the "other" changes and the potential environmental impacts.

The NOP states the primary project area covers approximately 1,500 acres for the landfill facilities and activities. Note that the current solid waste facilities permit limits this area to 1,399 acres.

Outdated Environmental Documents

As the previous EIR for the facility was prepared more than 25 years ago, it is recommended that the draft SEIR contain a full, up to date analysis of all possible significant impacts for the project as a whole, including the proposed changes. The draft SEIR should contain a recent and up to date Initial Study, along with current studies for traffic, air, water, noise and lighting and other impacts on sensitive receptors in the area as a result of operations as a whole at the KCL.

Cumulative Impacts

It is important that the draft SEIR identify potentially significant cumulative impacts, both locally and regionally, resulting from the proposed project and any combined projects within the project vicinity, as well as those incremental impacts resulting from the proposed project's implementation.

Maps and drawings

Indicate on maps and figures drawn to scale the location of all project proposals to be carried out over the 572 acre area identified as the extent of disturbance.

Noise

A current noise study may be necessary if local receptors are impacted from the project as proposed, and should be included in the draft SEIR. Additionally, appropriate noise-attenuating mitigation measures, which can be implemented to reduce noise levels, should be incorporated into the draft SEIR. Short term and cumulative impacts should be assessed as well as operations related noise.

Below is an internet link to the CalRecycle website that contains detailed California Environmental Quality Act information and requirements when applying for a Solid Waste Facilities Permit. This list should be used as a reference in the preparation of the Supplemental Environmental Impact Report to assure that all relevant information that relates to the current and proposed project, is addressed:

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Disposal.htm>

Conclusion

CalRecycle staff has no further comments on the project as proposed at this time and requests copies of the Draft and Final SEIR, Findings and Statement of Overriding Considerations (if one is required), Mitigation Monitoring and Reporting Program, Public Notices and any Notices of Determination. CalRecycle requests being noticed of the date, time and location of any public hearings regarding the project proposal at least ten days in advance.

Thank you for the opportunity to comment on this project in the early planning stages. If you have any questions regarding these comments, please contact me at 916.341.6411 or e-mail me at beatrice.poroli@calrecycle.ca.gov.

Sincerely,



Beatrice Poroli
Environmental Scientist
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

cc: Eric Fung, Contra Costa County Environmental Health Department

