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December 19, 2003

Ms. Deidra Dingman
Solid Waste Program Manager
Community Development Department
Contra Costa County Administration Bldg.
651 Pine St., 4th Floor, North Wing
Martinez, CA 94553-0095

Dear Ms. Dingman,

RE: WCCSL Bulk Materials Processing Center Nov. 2003 DEIR

Save The Bay would like to submit the following comments for consideration on the WCCSL Bulk Materials Processing Center and Related Actions Draft EIR:

Public Access

1. **The 0.5-mile Bay Trail spur to the southern breach in the outer levee should be included in Phase I.** The WCCSL Bay Trail Loop Committee, including representatives from ABAG, BCDC, City of Richmond, Contra Costa County, Neighborhood House of North Richmond, Save The Bay, Sierra Club, and TRAC, endorsed a public access plan that defined a ½ mile spur to the southern breach in the levee in Phase I. However, the current DEIR shows, incorrectly, this spur as part of Phase 4 (Fig. 3-7, p. 3-39). 11-1
2. **The Phase 4 Bay trail route on the outer levee segment now isolated by breaches should not be eliminated.** The multi-use trail around the outer levee of the landfill, including the section isolated by breaches is included in the North Richmond Shoreline Specific Plan. The DEIR recommends deletion of this Phase 4 trail even though no evidence is presented of use by nesting, roosting or resting birds—and therefore no evidence of significant adverse environmental effect. There is also no evidence presented in the DEIR that human access associated with the Phase 4 trail would “...diminish and possibly eliminate the use of this area by many species” (Section E4, p. 13-46). 11-2
3. **“Poison Oak” and “California blackberry” plant species proposed for the trail “barrier planting” should not be used.** There is no evidence that a barrier planting is needed to protect foraging birds. The plant species listed in Appendix 3K (Bayside Trail Planting Recommendations) include “poison oak,” to which many individuals are acutely allergic, and “California blackberry,” which has the potential to spread and require 11-3



management controls. Many of the other plant species listed in Appendix 3K could, however, provide vegetative enhancement and habitat for trail users and wildlife.

4. **Save The Bay supports appropriate access for canoes and kayaks to the shoreline at the southern end of Area C.** A canoe and kayak launch staging area should have minimum impact to the site and require the minimum feasible use of new fill. Save The Bay's "Canoes in Sloughs" program, which serves over 4,000 students annually, would support a launch at this site to expand its programs to this region of San Francisco Bay. Any launch should accommodate only self-powered boats.

11-4

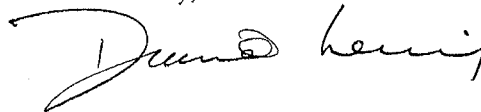
Sewage Sludge & Dredge Material

1. **Amounts and sources of sewage sludge to be processed should be specified.** The DEIR does not include sufficient information to determine the current amount of sewage products piped into the landfill. The DEIR is not clear on the source and amount of materials proposed for sewage sludge processing. The project describes "...spreading of wet dredged materials and/or biosolids (wastewater sludge) from the adjacent WCWD treatment plant..." (3.C.2.g). However, the proposed permit capacity for dredged material and biosolids exceeds what the WCWD plant now produces. The DEIR should clearly state what portion of the capacity amount would be made up of sewage and if this is more than the amount projected to be produced by WCWD.

11-5

We hope these comments will be helpful and thank you for your consideration.

Sincerely,



David Lewis
Executive Director