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December 12, 2003

Contra Costa County  
 Community Development Department  
 651 Pine Street, 4<sup>th</sup> Floor, North Wing  
 Martinez, CA 94553  
 Attention: Deidra Dingman

**Re: DEIR for WCCSL Bulk Materials Processing Center and Related Actions**

Dear Deidra:

On behalf of the Association of Bay Area Governments (ABAG) and the San Francisco Bay Trail Project, thank you for the opportunity to provide comments on this DEIR.

The Bay Trail Project is a nonprofit organization administered by ABAG that coordinates implementation of the Bay Trail. When complete, the Bay Trail will be a continuous 400-mile network of bicycling and hiking paths that will encircle San Francisco and San Pablo bays in their entirety. It will link the shoreline of all nine Bay Area counties, passing through 47 cities, and will cross seven of the eight toll bridges in the region. To date, 230 miles of the proposed system have been developed.

As described in the DEIR, the Bay Trail is planned to extend around the perimeter of the West County Sanitary Landfill in Richmond. The Bay Trail Project has participated in a multi-year effort to develop a public access plan for this trail alignment. The plan separates the trail into four phases, based on timing for closure of sections of the landfill.

However, the DEIR inaccurately reflects the end point of Phase I in the description on page 3-40 and on Figure 3.7. The loop trail committee endorsed a trail alignment and phasing plan in the February 2002 WCCSL Shoreline Public Access Trail Development Plan, and in this document, Phase I includes a spur extending from the southwest corner of the landfill to the southern breach in the outer levee. This section of the spur trail is incorrectly identified as part of Phase 4 in the DEIR.

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In addition, the DEIR calls for the elimination of the Phase 4 altogether but offers no evidence of a significant environmental impact. The DEIR speculates that the levee between the two breaches along Phase 4 provides "resting, roosting and nesting

substrate for numerous birds.” But this statement is not supported with field data that threatened or endangered species nest on the isolated section of the levee. Without this evidence, there is no clear environmental impact.

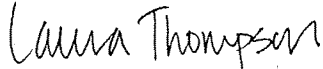
3-2

The DEIR also recommends planting a barrier of poison oak and California blackberry along the trail as a deterrent to entering the marsh. We do not agree with this recommendation since these plants can cause serious allergic reactions, especially when not recognized in dormant stages. Since this trail will provide scenic views and opportunities for bird watching, a less hostile planting option is more appropriate.

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Again, thank you for the opportunity to comment. Please contact me if you have questions about these comments.

Sincerely,



Laura Thompson  
Bay Trail Planner

cc: Bruce Beyaert, TRAC  
Steve Fiala, East Bay Regional Park District