



November 12th, 2015

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

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RE: Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (sEIR) to Amend Land Use Permit (Permit) #2020-89 for Keller Canyon Landfill #LP08-2026

Dear Mr. Brockbank,

Save Mount Diablo (SMD) is a non-profit conservation organization founded in 1971 which acquires land for addition to parks on and around Mount Diablo and monitors land use planning which might affect protected lands. We build trails, restore habitat, and are involved in environmental education. In 1971 there was just one park on Mount Diablo totaling 6,778 acres; today there are almost 50 parks and preserves around Mount Diablo totaling 110,000 acres. We include more than 8,000 donors and supporters.

We appreciate the opportunity to submit comments on the NOP for the proposed sEIR to amend the Permit for Keller Canyon Landfill (Landfill). Henceforth we will refer to the Permit amendment as the Project. The Project would increase the daily tonnage the Landfill may accept for disposal, establish separate limits for maximum daily tonnage of green waste and increase the maximum daily truck trips that may enter the landfill.

The increase in daily tonnage and truck traffic could have significant implications for greenhouse gas (GHG) emissions caused by the Project, as well as noise and traffic related impacts. GHGs, noise and traffic should all be analyzed in the sEIR to determine if any impacts would be significant, and mitigate accordingly.

The Project intends to tier off an EIR that was certified 26 years ago. The age of the primary EIR and the applicability of its environmental analysis to today's conditions concern us. We encourage all environmental documents prepared for the Project to undergo a thorough update. Given the age of the original EIR, preparing an entirely new EIR rather than tiering off the old one may be appropriate.

The Project also proposes to increase the Extent of Disturbance (EOD) by approximately 92 acres, a 19% increase over the current EOD. The current EOD is already highly visible from a number of points around the Project site, including from Highway 4, north of the Project site. An analysis of the aesthetic impacts of a significantly larger EOD should also be included in the sEIR.



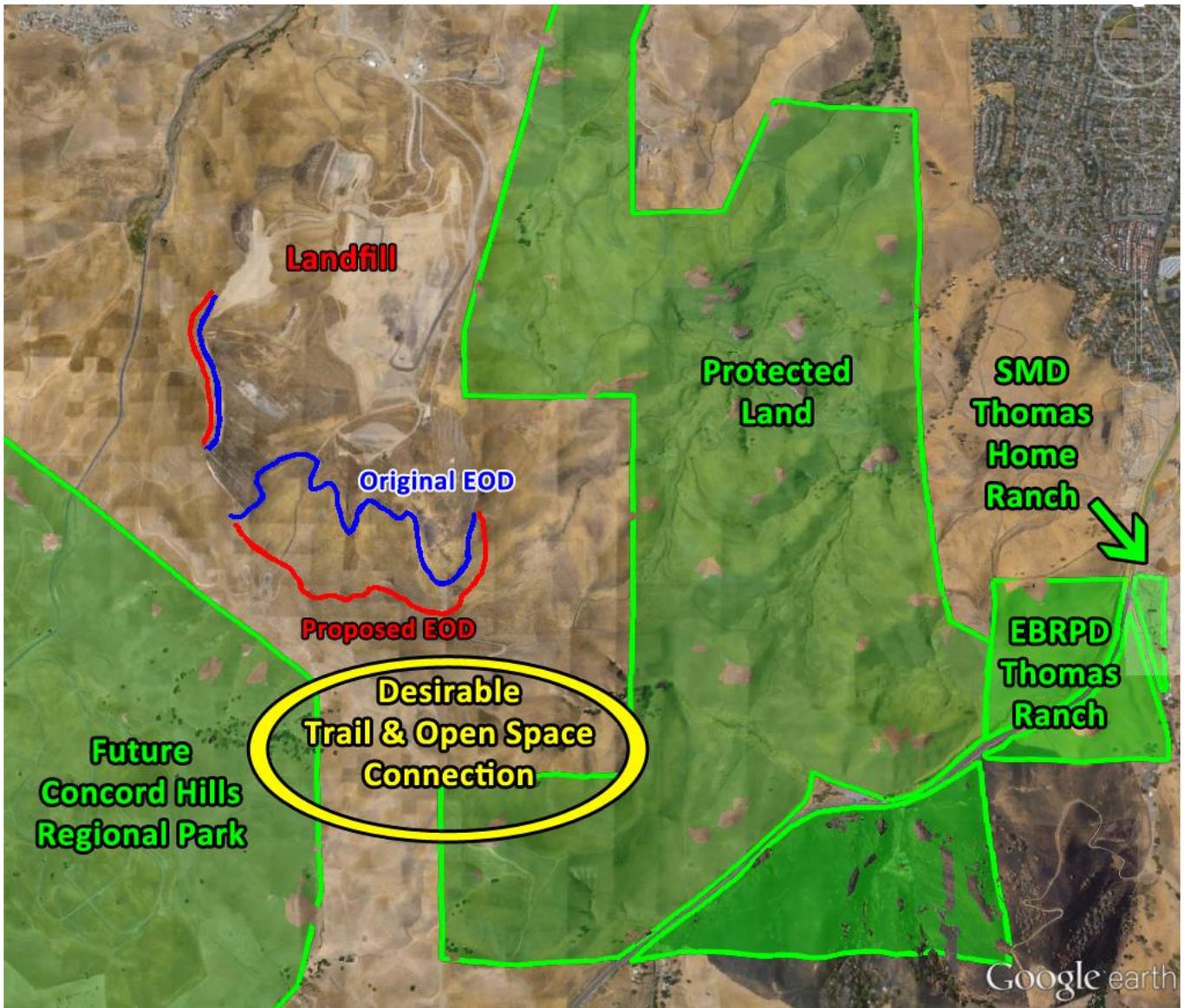


Figure 1. Map of area surrounding Project site showing EOD's, protected lands, and a desirable trail and open space connection zone.

The largest EOD increase would be located on the southern portion of the Project site, in the direction of a large mass of protected lands that connect to surround the Project site to the south and east (Figure 1). These protected lands connect with the East Bay Regional Park District's Thomas Ranch protected lands, which are adjacent to SMD's Thomas Home Ranch property. This complex of contiguous protected lands is separated by only a short distance from the 2,540 future Concord Hills Regional Park to the west.

We are very interested in establishing a trail and open space connection between these two large protected open space areas. Project mitigation to this effect would be appropriate and highly desirable given the location of the Project site and potential Project impacts. This should be identified and discussed in the sEIR.

Thank you for the opportunity to provide comments.

Sincerely,

Juan Pablo Galván
Land Use Planner