



June 23, 2008

Deidra Dingman
Contra Costa County
Department of Conservation and Development
651 Pine Street, North Wing – 4th Floor
Martinez, CA 94553-1229

RE: Proposed Keller Canyon Landfill Expansion (County File No. LP08-2026)

Dear Ms. Dingman:

The East Bay Regional Park District has received a copy of Contra Costa County's "Agency Comment Request" notification for the Keller Canyon Landfill expansion. The project is positioned between the District's Black Diamond Mines Regional Preserve and the former Concord Naval Weapons Station. We are working with the City of Concord's Local Reuse Authority and the National Park Service to establish a regional park in the area. The project also adjoins the habitat preserve system of the East Contra Costa County Habitat Conservation Plan / Natural Communities Conservation Plan ("HCP/NCCP"). We believe additional information is required regarding the project's regulatory compliance status, traffic impacts, special status species impacts and other impacts to the environment. Given the magnitude and wide range of potential impacts and new circumstances presented by the project, we believe an Environmental Impact Report should be prepared.

The District is dedicated to preserving open space in the East Bay. We are also a partner of the HCP/NCCP and share the Plan's vision to protect special status species. Any aspect of the project that would impact our ability to carry out our mission is of concern to us. We request that information and analysis be made available that address the following issues:

1. Compliance with Conditions of Approval and Regulations – Provide an analysis of Keller Canyon Landfill Company's compliance with County conditions of approval and the requirements of regulatory agencies with jurisdiction over the project. Include a condition-by-condition check list analysis of the status of the project's compliance with the conditions of approval. Provide details explaining the date of compliance and cite applicable reference documents. Disclose any violations and outstanding conditions of approval. Confirm if conservation easements associated with the original project were ever recorded.
2. Traffic - Demonstrate that the project will have no impact on local and regional roadways, including incremental cumulative contributions to existing and future

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conditions. Provide a new traffic impact study using current traffic counts and Level of Service (LOS) analysis of key intersections in Concord, Pittsburg and unincorporated Contra Costa County. Provide an analysis of how increased traffic volumes from the project may exacerbate hazards to pedestrians, bicyclists and motor vehicles.

3. Other Impacts – Given the proposed intensification of the use and changed regulatory and physical environment since 1989, the County should consider the project's impact on air quality, aesthetics, landslides/mass wasting, invasive/exotic plants, increased predation (from gulls) on special status species, increased water consumption, creek diversions, climate change, water quality, and wildlife mortality on roads.
4. Special Status Species - Since 1989, California tiger salamander, California red legged frog, American badger, and Alameda whip snake have been listed as threatened, endangered or assigned special status. Provide analysis explaining how the project will affect special status species. The adequacy of existing habitat and species management plans for the operation should be evaluated to determine if they are based on the most current scientific understanding for conservation and management of these species. The need for additional mitigation lands should also be evaluated given the degradation of habitat that may occur as a result of intensifying landfill activities.
5. California Environmental Quality Act (CEQA) – The proposed expansion and operational changes are not included in the project description or analysis of the 1989 Keller Canyon Environmental Impact Report (EIR). It appears that there could be a 77% increase (combined “disposal” tonnage and “non-landfill” tonnage) of material coming onto the property from what was originally analyzed in 1989. Given this large increase in use and wide range of potential impacts and new circumstances outlined above, an Environmental Impact Report should be prepared.

Thank you for your review and consideration of our comments. We request that we be notified of any public meetings or hearings scheduled for this project and that a copy of any CEQA notices or associated documents be forwarded to us for this project. If you have any questions or comments, please contact me at (510) 544-2627 or via email at cbarton@ebparks.org.

Sincerely



Chris Barton
Senior Planner