



July 29, 2014

StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

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Peter Slote
City of Oakland Environmental Services
250 Frank H. Ogawa Plaza, Ste 5301
Oakland, CA 94612

SUBJECT: COMMENTS FOR PUBLIC HEARING RELATED TO AWARD OF ZERO WASTE FRANCHISES

Dear Peter,

StopWaste staff reviewed the Clements Environmental document analyzing the timeline for various permits. We believe that the timeline of 60 to 90 days for a County Integrated Waste Management Plan (CoIWMP) amendment and conformance finding (with completion by December 1, 2014) is too short for the CWS Interim Transfer Facility. That estimate was generic for a relatively uncomplicated amendment and conformance finding. That timeframe does not take into account the complexity and neighborhood location of the project. The interim facility might have more complicated issues to consider than even the Recology East Bay Organics Pre-processing facility CoIWMP amendment, which took 4 months from the submittal of a complete application to the final amendment.

As another responsible public agency under CEQA, we would need to review the EBMUD EIR and determine whether new information, changed circumstances or changes to the project require any additional environmental review for this type of facility. One important fact in this situation is that the EBMUD Board and our Board found that any additional particulate emissions in that neighborhood would create a significant cumulative air quality impact.

Given that, all potentially feasible mitigations to reduce diesel particulate emissions, and thus cumulative air quality impacts, will need to be discussed with the applicant, and those that are feasible will need to be required of the applicant. For example, is it feasible to use CNG trucks from the start of the project? In the case of the Recology East Bay Organics facility, our Agency made a finding of overriding considerations and imposed all feasible mitigations. But a refuse transfer station is a different type of facility and we are uncertain at this time about what evaluations or mitigation measures might be required by law.

Based on the above, we are writing this letter to be sure the City is aware that there could be environmental, schedule or cost consequences as a result of the CoIWMP amendment process.

Sincerely,

Debra Kaufman
Senior Program Manager

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