

**Edwards, Dawn**

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**From:** Curry, Damien, CDA <damien.curry@acgov.org>  
**Sent:** Monday, January 13, 2020 4:11 PM  
**To:** Edwards, Dawn; Tice, Leslie  
**Subject:** FW: Jess Ranch DEIR PLN2015-00087  
**Attachments:** Jess-Ranch-PLN2015-00087\_StopWaste-comments.pdf

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**From:** Kelly Schoonmaker <KSchoonmaker@stopwaste.org>  
**Sent:** Monday, January 13, 2020 4:10 PM  
**To:** Curry, Damien, CDA <damien.curry@acgov.org>  
**Cc:** Wendy Sommer <wsommer@stopwaste.org>  
**Subject:** Jess Ranch DEIR PLN2015-00087

Hi Damien,

Attached is a letter from StopWaste with our comments on the Jess Ranch DEIR. If you have any questions, please do not hesitate to contact me.

Thanks,  
Kelly

**Kelly Schoonmaker**  
Program Manager | StopWaste  
1537 Webster St. | Oakland, CA 94612  
p: (510) 891-6500 | f: (510) 893-2308

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January 13, 2020

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.

Damien Curry  
ATTN: Jess Ranch Compost Facility / PLN2015-00087  
Alameda County Community Development Agency  
224 W. Winton Avenue, Suite 111  
Hayward, CA 94544

Dear Mr. Curry,

The Alameda County Waste Management Authority (WMA) is pleased to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed 1,000 tons per day composting facility at Jess Ranch Road ("Project"). WMA is a Responsible Agency with regard to the Project under the California Environmental Quality Act (CEQA). All proposed composting facilities in Alameda County must meet the siting criteria for proposed solid waste facilities in the Countywide Integrated Waste Management Plan (CoIWMP). The CoIWMP can be found at <http://www.stopwaste.org/resource/reports/countywide-integrated-waste-management-plan-coiwmp>

As a solid waste agency, we understand and support the development of composting infrastructure. However, we have concerns about this particular environmental document, including the assessment of the need for the Project, potential impacts, and analysis of alternatives. The WMA provides the following comments on the DEIR:

*2.1.3 Need for the Proposed Project*

In the assessment of existing composting capacity serving Alameda County, the DEIR suggests that to have the least environmental impact, facilities should be located within the county boundary. We would like to correct this assumption; in some cases, the closest facility to a jurisdiction can be located in a neighboring county, as is the case with Newby Island in Milpitas, which processes organics from Fremont, Union City, and Newark. Shifting organics processing from Newby Island to Jess Ranch would result in a significant increase in vehicle miles traveled (VMT; approximately 45 miles one way to Jess Ranch, compared to about 10 miles to Newby). Similarly, Waste Management hauls from the Davis Street Transfer Station (Davis Street) to the Redwood Landfill, 45 miles away, and back hauls material to Davis Street. Located 40 miles away from Davis Street, Jess Ranch is not much closer than Redwood Landfill, and would not allow trucks to back haul material. Section 3.14 analyzes how feedstock delivery will impact daily trips, but it is unclear how compost feedstock (and product) delivery will affect vehicle miles traveled and related impacts, including GHG emissions.

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Oakland, CA 94612

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f 510-893-2308  
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The DEIR indicates that 35% of organics are currently being disposed in Alameda County in the Executive Summary, and that compostables make up 27% of all landfilled materials and 18.2% of landfilled materials in Alameda County in Section 2.1.3. An explanation for how and when those percentages were calculated would be helpful.

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We would like to offer some corrections to the inventory of composting facilities in Table 2.1-1. There are currently two operating composting facilities located in Alameda County: Altamont Composting Facility and Vision Recycling on Greenville Road in Livermore (01-AA-0322). Table 2.1-1 incorrectly lists Bee Green, Vision (Newark), and Vision (Livermore 01-AA-0308) as composting facilities, but these facilities are chip and grind facilities. In addition, the final EIR should include the Davis Street Transfer Station in-vessel digestion facility in San Leandro (01-AA-0007).

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Based on the information from the WMA 2017 Waste Characterization Study, along with the increased organics processing capacity in Livermore and at Davis Street, our organics processing capacity analysis for AB 876 indicates sufficient capacity for 15 years. However, this analysis does not include capacity for composting biosolids. The DEIR indicates the 160,000 dry tons of biosolids are produced every year. The DEIR identifies agricultural uses in the California Central Valley as the primary market area, and that feedstock will come from Alameda County. Because biosolids are not an acceptable feedstock for an Organic Input Material (OIM), compost produced by the Project will not be able to be used on organic farms or by the cities in Alameda County, most of which require the use of CDFA-registered organic compost. Food waste and green waste are acceptable feedstocks for OIM, however, so mixing them with biosolids decreases their value. SB 1383 will require cities to procure a minimum amount of compost annually. The intent, though not a requirement, is that cities purchase compost created from their own organic streams. If a city blends their food waste with biosolids, then the resulting (non-OIM) compost will not meet city standards. The final EIR should focus on the need for biosolids composting specifically, rather than including food waste to meet county solid waste goals.

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8

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*3.4 Air Quality and Greenhouse Gases: Impact AQ-1: Would the Proposed Project conflict with or obstruct implementation of the BAAQMD 2017 Clean Air Plan? – Significant Impact*  
Mitigation Measure AQ-3 (Composting Control Measures) mitigates only those emissions from active composting, leaving emissions generated during curing uncontrolled. We recommend adding as a mitigation measure providing funding to implement carbon farming in Alameda County to further mitigate emissions. Carbon farming is the implementation of multiple practices, including compost application on rangeland, to increase the ability of the soil to capture and sequester carbon from the atmosphere.

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As required in the BAAQMD 2017 Clean Air Plan, BAAQMD Regulation 13 Rule 3 is currently in development and to be finalized this year. If this rule has taken effect, the Project will need to demonstrate compliance for inclusion in the CoIWMP.

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*3.5 Biological Resources*

In addition to our role as a Responsible Agency, the WMA is the Landowner and Preserve Manager for the Golden Hills Ecological Preserve conservation easement ("Conservation Easement"; APN 099A-1800-002-0; Series #2018241893), located within 4 miles of the Project site. The Conservation Easement was established to provide habitat for the San Joaquin kit fox (*Vulpes macrotis mutica*), California tiger salamander (*Ambystoma californiense*), California red-

legged frog (*Rana draytonii*), burrowing owl (*Athene cunicularia*), and other special-status species as a result of the Golden Hills Repowering Project. We are concerned that the location of the Project may interfere with our ability to meet the goals of the Conservation Easement, and that the proposed mitigation measures do not adequately mitigate the potential habitat fragmentation and impacts to special-status species. Purchase of mitigation credit, on-site restoration, or payment of fees does not adequately mitigate loss of habitat caused by the Project to an insignificant level. We recommend requiring the purchase of a conservation easement in the Altamont Hills that protects biological resources similar to those impacted by the development of the Project.

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*3.13 Public Services and Utilities: Impact PSU-2 – Require a sufficient water supply to serve the Project*

For the final EIR, we recommend that the Project reevaluate the estimated process water needed and the impacts of how it is conveyed to the site. Although the DEIR identifies (generally) where process water might originate from, it does not address the challenges and potential impacts of having a distant water source. At the same time the DEIR severely underestimates the total amount of water a project of this magnitude would require. Although biosolids, and to a lesser extent food scraps, contain significant amounts of moisture, the largest volume of materials composted will likely be green material, which is very dry during most of the year in eastern Alameda County. The DEIR estimates that the facility will process about 380 tons/day biosolids and food waste, and about 570 tons/day total bulking agent (green material, wood chips), which would be about 75% green material and wood by volume. We consulted with a compost facility development and permitting expert who indicated that a facility processing 1,000 tons per day of a mix that is 75 percent green material and wood by volume will require far more than 10,000 to 25,000 gallons of water per day. We request that a more reasonable, clear estimate of water requirements be included in the final EIR. The additional impacts (truck traffic, VMTs and safety) should also be evaluated.

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*Multiple Sections*

For the final EIR, we recommend dramatically reducing the amount of material processed on this site and/or reevaluating the impacts on several impact criteria. The Project indicates that 1,000 tons per day of mixed feedstocks will be received, processed, and composted on 15 acres. For comparison, the nearby Altamont Composting Facility, also using an aerated static pile (ASP) system, requires 60 acres to process half this volume (500 tons per day). Operating a facility of this size with limited space can lead to additional environmental impacts such as safety, fire and air quality. Because the available area is limited (by site constraints) the DEIR indicates that ASP piles will be 12 feet high. This is well above typical ASP operating parameters and will require significantly large air handling equipment to provide adequate aeration to 12 foot piles. It is far more common to have lower piles, which are more easily aerated. However, lowering the piles will reduce the available throughput of the facility. Having a large amount of material on inadequate space tends to exacerbate challenges at composting facilities. Potential impacts include employee safety, fires, and inadequate composting time. Inadequate space and too much material can and has led to fires at composting facilities. The Project area is extremely prone to fast moving brush fires. A fire at a biosolids composting facility in Austin, caused by inadequate compost retention times, cost the City of Austin \$9 million and caused impacts to water, air, and public services. See:

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<https://www.statesman.com/article/20130622/NEWS/306229735>. Following is a list of potential consequences of the inadequate size of the site and sections affected:

- Increased fire risk from proposed pile height and inadequate retention times
  - Section 3.2.11 Wildfire
  - Section 3.9 Impact HAZ-6
- Increased energy consumption to fully aerate piles
  - Section 3.7 Energy Impact ENRG-1
- Increased odor from immature material on site
  - Section 3.4 Impact AQ-5

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*Section 4.2 Alternatives Analysis:* This section includes a “no project” alternative and an enclosed facility alternative. In our opinion this is inadequate, and we request that in the final EIR, the analysis of alternatives include an alternative for a facility that processes a significantly lower throughput. While processing less material will not lessen the impact to biological resources, it will reduce the potential problems caused by processing too much material on too small a site.

If you have any questions, please do not hesitate to contact Kelly Schoonmaker, our staff leading the organics projects, at 510-891-6500.

Regards,



Wendy Sommer  
Executive Director

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