



SIERRA CLUB MARIN GROUP

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February 6, 2006

Philip Smith

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Marin County Community Development Agency
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Planning Commissioners

c/o Kim Shine, Marin County Planning Commission Secretary
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Re: Redwood Landfill Solid Waste Facilities

Dear Mr. Smith and Planning Commissioners,

On behalf of the Sierra Club's 7,000 Marin County members, we write to advise you that our organization has determined to oppose the proposed expansion of capacity of the Redwood Sanitary Landfill ("Landfill") and other proposed provisions of the requested permit revision.

We therefore ask that Marin County Environmental Health Services (EHS) deny the requested Redwood Landfill Solid Waste Facilities Permit Revision (FEIR SCH No. 1991033042). We further request that EHS acknowledge that significant unmitigated impacts would result from the proposed permit revision.

Our review of this matter also revealed inconsistencies between the guiding 1958 land use permit and current Landfill operations. We therefore request that the Planning Commission re-open and update the Landfill's land use permit.

Our conclusions regarding the Solid Waste Facilities permit revision are expressed well by this quote from the California Integrated Waste Management

Board in its comment letter on the project FEIR, in regard to the Redwood Landfill Expansion:

*"If proposed today as a new facility in California, Redwood Sanitary Landfill would not have been located in such an environmentally sensitive wetland as it is now situated. The unfortunate location of the facility has resulted in serious concerns in the areas of traffic, air quality, plant and animal habitat, and impacts to subsurface and surface water. Despite mitigation measures proposed to offset potential impacts as a result of the proposed increases in traffic, waste, and landfill capacity, further serious impacts may still occur if the proposed project is implemented in full."
(Comment Letter C.)*

With regard to expansion of Redwood Landfill capacity, we find that:

- If a landfill for Marin County were to be sited anew today, Redwood Landfill's current location, directly placed in a highly sensitive ecosystem already heavily affected by environmentally harmful factors, would be one of the least likely and least desirable in the County and a virtual impossibility in today's regulatory framework
- The Landfill's location on natural sloughs and in close proximity to major earthquake fault lines significantly increases the probability of a containment breach
- In addition to its sensitive and problematic location, Redwood Landfill was not built to current safety standards
- The Landfill was built without a liner to assure separation of waste from surrounding groundwater; and WMI has determined it infeasible to add a liner at this time
- The Landfill also does not have a complete leachate collection system surrounding the site to contain waste-water run-off
- Expansion of Redwood Landfill's capacity has significant unmitigable environmental impacts, such as EIR findings of unavoidable negative air quality impacts
- Expansion of Redwood Landfill's capacity would significantly increase the probability of containment failures and of large-scale failure. Similarly engineered landfills have had containment failures, in particular the Acme Landfill in Martinez landfill that was built on bay mud and with a 3:1 slope, and a failure of the Sonoma Landfill operation which resulted in its closure

- Factors such as rising sea levels due to global warming and tidal action also increase the probability over time of containment failure
- Waste present in Redwood Landfill includes hazardous waste that is likely to be highly ecologically harmful should containment fail
- In the event of a significant containment failure, reclamation and restoration measures would likely prove inadequate to prevent significant and lasting environmental harm

In terms of other aspects of the requested permit revision, we find that:

- The current operating permit does not adequately cover current activities; the 1958 permit should be opened by County planning, and brought up to current standards that reflect current operational activities
- The lack of independent monitoring is a matter of concern
- The operation may be inappropriate for regional waste disposal
- Dramatically reduced life-per-volume projections between 1995 and 2003 raise important questions about the operation that have yet to be answered
- Current tipping fees should probably be revised and increased

With regard to consequences of denial of the requested permit revision, we find that:

- Redwood Landfill's representatives have stated that denial of the requested permit revision will not result in premature closure of the operation
- With or without approval of the requested permit revision, closure of the Redwood Landfill operation is inevitable
- The 19 years of remaining use leaves a sufficient period of time in which the County may identify a more suitable site for waste disposal

- Approaches exist by which the operational lifetime of the site may be extended without increased capacity, including adoption of a zero waste strategy, increases in tipping fees, and more appropriate handling of certain types of waste, such as bio-material sludge
- Alternative sites exist that are reasonably cost-effective and environmentally superior
- Increases in waste disposal cost are preferable if they result in a more environmentally appropriate destination for waste

The Sierra Club requests that the County of Marin deny the requested Redwood Landfill Solid Waste Facilities Permit Revision (FEIR SCH No. 1991033042), begin processes to identify potential sites for Marin waste upon closure of the Redwood Landfill, and examine the possibility of opening the existing permit for the purpose of bringing it into alignment with modern standards.

Thank you.

(signature on hard copy faxed)

Gordon Bennett, Marin Group Chair
SF Bay Chapter Executive Committee

Cc:

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