Author	Letter No.	Comment No.	Comment Text	Resource/Section	Comment Response
StopWaste	**9**	1	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).	Project Description	*Your comments are correct that organics from Fremont, Union City and Newark would likely be transported to Newby Island due to their close proximity. Project proponent does not anticipate any organic waste from these cities being transported the proposed site unless that facility is closed. The traffic study did not anticipate any traffic from the cities mentioned above.* *As discussed in Section 2.1.3, Need for the Proposed Project, the Project site would be the only composting operation in the Bay Area that could use biosolids as a compost feedstock. Although the Project site is fairly far removed from the Alameda County population centers, it still would be the closest facility and serve as an important component in the region's efforts to divert waste. The site is zoned for a composting facility and is precisely where the County land use plans intend to build such a use, where these land use plans were prepared, considered, and approved with considerable forethought.* *Additionally, the project related traffic was evaluated in Section 3.14, with a focus on impacts associated with VMT and LOS, and no significant and unavoidable impacts are expected. The DEIR provides that the project would increase VMT by a marginal amount of 0.03 percent for the County and 0.86 percent in the County TAZ. This would be a conservative estimate. Therefore, if trucks now go to the Project site rather than Keller Canyon Landfill or Stanislaus County, there is a possibility of a net reduction of VMT.*
StopWaste	**9**	2	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.	Project Description	*Thank you for the comment. It is not likely that the project will receive organic waste from Waste Management's Davis Street facility due to the company operating their own composting facilities. However, there are other sources of organic waste in Alameda County within 20 miles of the proposed facility, which would reduce transportation distances. For instance, Pleasanton Disposal operate a materials handling facility in Pleasanton and sends their organic waste to an out of county composting facility. In addition, Livermore Sanitation also operates a materials handling facility in Livermore and sends its organic waste to an out of county composting facility. If these materials were sent to the proposed facility, transportation costs and greenhouse gas impacts would be reduced.*
StopWaste	**9**	3	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.	Transportation	*The DEIR evaluates the total estimated daily truck trips for all transportation analysis. Transportation Section 3.14, Impact TRANS-1 evaluates Vehicle Miles Traveled and presents output of the assessment. Air Quality and Greenhouse Gases Section 3.4 contains information related to GHG emissions, including a VMT analysis.*
StopWaste	**9**	4	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.	Project Description	*Thank you for your comment. According to the 2020 Alameda County Integrated Waste Management Plan, 20 percent of organics are currently in the waste stream in the County (ACWMA 2020). As discussed in Section 2.1.3, the 2017-2018 Annual Alameda County Waste Characterization Study showed that organics, broken into categories: food soiled paper, plant debris and food scraps made up 18.2% of the waste stream. The FEIR will be revised to reflect this current data.*

StopWaste	**9**	5	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).	Project Description	*Thank you for your comment. The FEIR will be amended per your suggestions.*
StopWaste	**9**	6	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.	Project Description	*Thank you for your comment. Please refer to the Project Description for more information about Project operations.*
StopWaste	**9**	7	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.	Project Description	*Thank you for your comment. It is correct that the presence of biosolids in the compost disqualifies it from use on organic farms or acceptable feedstock for the OIM program. However, biosolids compost is well-suited to non-food crop agricultural uses and there is a market for the product nearby. There does not appear to be a shortage of organic compost available to cities in Alameda County.* *As discussed in Section 2.1.3, the Bay Area produces approximately 160,000 dry tons of biosolids annually, and the Proposed Project would be the only site in the Bay Area that could use biosolids as a compost feedstock. This being said, the Bay Area will produce biosolids with or without the Proposed Project. Therefore, there will already be a large waste stream that can be recycled into organic farm and other uses. According to the EPA Biosolids Technology Fact Sheet on Land Application of Biosolids (EPA 2000), biosolids can be used on agricultural land, forests, rangelands, or on disturbed land in need of reclamation. The EPA indicates that recycling biosolids through land application serves several purposes, including improving soil properties, increasing drought tolerance of vegetation, supplying nutrients for essential plant growth, and serving as an alternative to inorganic fertilizers which can leach into ground and surface waters more easily. Therefore, the Proposed Project would meet a need to accommodate biosolids in the County while providing beneficial uses for the environment.*
StopWaste	**9**	8	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.	Project Description	*Thank you for your comment. As mentioned in response to Comment 9-7, there does not appear to be a shortage of organic compost in order to meet SB 1383.*

StopWaste	**9**	9	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.	Air Quality	*According to the BAAQMD's Preliminary Engineering Evaluation Report, 90% of POCs are released during the primary composting phase and 10% are released during the curing stage. Project proponent will be utilizing an aerated static pile technology that reduces ozone precursors by at least 80% during the primary composting phase. The project does not anticipate utilizing emission controls on the curing piles. However, the project proponent would be interested in and will consider participating in carbon farming projects to mitigate air quality and greenhouse gas impacts of the project. Mitigation Measure AQ-3 has been revised to include funding to implement carbon farming in Alameda County to mitigate emissions during the curing process.*
StopWaste	**9**	10	As required in the BAAQMD 2017 Clean Air Plan, BAAQMD Regulation 13 Rule 3 is currently indevelopment and to be finalized this year. If this rule has taken effect, the Project will need to demonstrate compliance for inclusion in the CoIWMP.	Air Quality	*Thank you for your comment. It is acknowledged that Draft Regulation 13 Rule 3 is in development, and would address best management practices for storage times, pile dimensions, feedstock content, reporting requirements, and testing methods. Draft Rule 13-3 may also require abatement technology for large-scale composting operations such as the use of finished compost cover on active piles or biofiltration for ASP, as well as metrics for determining the end of the active compost phase. Please note that the proposed project includes the use of ASP biofilters and covers on compost piles (see pages 2-3, 2-4, 2-14, and 2-16 of the DEIR). The details of these regulations have not been adopted, but the project will comply with all applicable regulations. Please refer to impact AQ-1 and mitigation measures AQ-1, AQ-2, and AQ-3 for further information about compliance with BAAQMD regulations.*
StopWaste	**9**	11	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 redlegged 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.	Biology	*The project will be compliant with the East Alameda County Conservation Strategy and applicable laws and regulations; therefore, mitigation for impacts on habitats, wetlands, waters, and/or special-status species will be consistent with the requirements of the appropriate regulating agencies including the Corps, USFWS, CDFW, and the Water Board. It is anticipated that the mitigation for the project will be accomplished on-site by deeding mitigation property to an approved land trust. Project proponent will provide an endowment to pay the trust to manage and monitor the mitigation property in perpetuity. The proposed project is located adjacent to the Contra Costa Water District's conservation easement and it is unlikely that the proposed project would impact the WMA's conservation easement located 4 miles away. The project proponent intends to provide mitigation land for the listed endangered species and special status species on-site contiguous to the existing conservation easement owned by the Contra Costa Water District. However, the adequacy of proposed land for mitigation is subject to approval by the State Department of Fish and Wildlife and the US Fish and Wildlife Service.*
StopWaste	**9**	12	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	Water Supply	*Thank you for your comment. The estimated water usage is within the range of another aerated static pile composting facility in the region. Alameda County determined that the Vision Composting facility located in Livermore would utilize 288,000 gallons of water annually for a facility that would process up to 50,000 cubic yards per year. Based on the county's estimate for the Vision facility, the proposed project would require 15,000 gallons per day.* *Per conversations with StopWaste on the Jess Ranch Partial Recirculation Document, the County will condition the Proposed Project on the need for additional approvals from regulators if the Project exceeds 500 tpd. The County and Applicant have agreed to share draft conditions of approval with StopWaste before the conditions are finalized. Conditions will include Project information, such as design and permitting requirements, that will help to address some of StopWaste's concerns, such as water supply, on the Proposed Project. Once CEQA documents are adopted and all local approvals and permits have been granted, the Applicant will work with StopWaste to start the CoIWMP amendment and conformance finding process.*

			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.		
StopWaste	**9**	13	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.	Project Description	*Thank you for your comment. The Notice of Applicability for the Altamont Composting Facility, Water Quality Order 2015-0121-DWQ states that the facility consists of 10 acres of active composting area and 28 acres of curing area. It describes composting piles as 11.5 feet high (excluding cover), 85 feet long and 30 feet wide. The active composting period is 21 days to 35 days. The Jess Ranch facility proposes 22 days of active composting and 14-22 days of curing. The Altamont facility is producing a compost product marketed to landscapers and vineyards, which requires longer curing time and more storage capacity for finished product. The Jess Ranch facility will be producing an agricultural grade product that does not require long curing times. The reduced active composting phase (22 days) and shorter curing times (14-20 days) reduces that area required for composting, curing and storage compared to the Altamont Facility. The DEIR states on page 2-9 (Greenwaste Stockpile Area) that stockpiled greenwaste piles would 12 feet high, which is the maximum allowed by county fire regulations. The pile height for initial active composting would be approximately 10 feet.* *Per conversations with StopWaste on the Jess Ranch Partial Recirculation Document, the County will condition the Proposed Project on the need for additional approvals from regulators if the Project exceeds 500 tpd. The County and Applicant have agreed to share draft conditions of approval with StopWaste before the conditions are finalized. Conditions will include Project information, such as design and permitting requirements, that will help to address some of StopWaste's concerns, if any, on the Proposed Project. Once CEQA documents are adopted and all local approvals and permits have been granted, the Applicant will work with StopWaste to start the CoIWMP amendment and conformance finding process.*
StopWaste	**9**	14	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.	Fire	*Thank you for your comment. As you noted the Austin fire was not associated with a brush fire. All composting facilities have the potential for fires, usually due to poor management practices and failure to monitor temperatures in the compost curing and storage piles. Alameda County limits the size and height of compost piles and storage piles to help mitigate fire risks. Please see Page 2-16 (Fire Prevention) of the DEIR for additional information on fire prevention.* *According to the Cal Fire Alameda County Fire Hazard Severity Zones Map, the Proposed Project is located in a Moderate Fire Hazard Severity Zone of an SRA (Cal Fire 2007). The Project Area is not located in the direct vicinity of very high fire hazard severity zones. As a result, there would be no impact on wildfires, and therefore, no further analysis was necessary in the EIR.* *As for combustion during the composting process, the DEIR identifies that composting material might spontaneously combust at height temperatures and low moisture content. Please see pages 2-2 and 3.9-11 of the DEIR. However, the project's design, which includes temperature sensors that are used in combination with positive and negative air flow (accomplished with blowers systems and perforated aeration pipes) to automatically control the frequency of aeration that, in turn, moderates temperatures, as discussed on page 2-3 of the DEIR. A water tank for fire suppression would also be installed as part of the facilities with a capacity of 120,000 gallons, capable of sustaining flows of 1,000 gallons per minute for 2 hours in accordance with Alameda County Fire Department regulations, as discussed on page 2-17 of the DEIR. Background detail on these systems is addressed in further detail in Appendix B of the DEIR. Fire risk is further mitigated by limiting the height of compost piles and turning the compost when temperatures reach a certain level. These and other practices will be implemented as part of project operations and to ensure compliance with applicable law. To this end, the project will be operated in compliance with all fire regulations and CalRecycle regulations, including Section 1908.3 of Chapter 19 of the California Fire Code and Title 14, Section 17867(9) of the California Code of Regulations. These*

					regulations mandate protection and control measures that include (but are not be limited to): temperature monitoring; limits on composing, curing, and storage piles; the provision of adequate water supply for fire suppression; the isolation of potential ignition sources from combustible materials; fire sprinkler systems for proposed buildings; and fire lanes at a minimum of 20 feet in width to allow fire control equipment access to all active composting areas. Travel lanes will also be provided between rows of compost rows. Please see pages 2-15, 3.9-11, 3.9-12 of the DEIR. *It should be noted, too, that the project will be operated to utilize a higher proportion of biosolids as feedstock, which contain higher water content than ordinary feedstock. This sourcing is a specific goal of the project, to provide a composting option for the County's biosolids waste stream, which currently is underserved, as discussed in the DEIR's project description and elsewhere in the DEIR's responses to comments.*
StopWaste	**9**	15	See: 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 o Section 3.2.11 Wildfire o Section 3.9 Impact HAZ-6 * Increased energy consumption to fully aerate piles o Section 3.7 Energy Impact ENRG-1 * Increased odor from immature material on site o Section 3.4 Impact AQ-5	General	*Thank you for your comment. Regarding increased fire risk, the Alameda County Fire Regulations limit the size and height of compost piles to reduce fire risk. CalRecycle also has regulations based on the California Fire Code to reduce fire risk as described in Section 2.2.5 - Fire Risk (see page 2-16). Section 3.9 - Impact HAZ-6 (see page3.9-12) also identifies site-specific mitigation measures to reduce fire risk. As stated in response 9-13 above, the initial height of the compost piles would be approximately 10 feet, which the common height for aerated static pile composting. Therefore, the project would not be using more electrical power to operate the aeration blowers than typical composting operations. Regarding potential odors from immature material on-site, Section 3.4 Impact AQ-5 states that most objectional odors occur during the first 14 days of the composting process. During the initial active composting phase the piles are covered for 22 days in order to reduce odors. There is an additional 14-20 days of curing, before the finished compost is sent to the product storage area. Table 3.4-7 (see page 3.4-21) lists potential odors and characteristics during the composting process. The minimum composting period at the proposed facility is 36 days, which the Table shows would result in an "earthy, soil" like odor.*
StopWaste	**9**	16	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.	Project Description	*Thank you for your comment. A Reduced Project Size Alternative was analyzed in the Draft EIR Partial Recirculation document. The Reduced Project Size Alternative assumes that the project would process an average of 500 tons per day of organic waste, instead of the 1,000 tons per day project analyzed in the DEIR. This reduced-size project would be located in the same property with a reduced-size site footprint.* *While some impacts on resources would be less under the Reduced Project Size Alterative, this alternative is not consistent with the Project need and objectives of assisting the County and surrounding counties in meaningfully meeting their future diversion goals. As described in Section 2.1 of the Draft EIR, the County has set a goal to reduce waste by 75 percent throughout the County by diverting the waste stream up to 1,000 tons per day. Currently, a major portion of Alameda County’s composting feedstock is being transported out of the County to composting facilities.* *As shown in the Alameda County 2015–2023 Housing Element of the General Plan, the Association of Bay Area Governments projects a 9.4 percent growth in population for Alameda County from 2020 to 2030, and an additional 9.8 percent from 2030 to 2040. Similarly, the Association of Bay Area Governments projects 22 percent growth in Contra Costa County from 2020 to 2040 and more than 26 percent growth in the same period for Santa Clara County (http://projections.planbayarea.org/). Therefore, Alameda County may not be able to rely as heavily on diverting waste to composting facilities in surrounding counties because many of these counties have steep growth projections and waste diversion goals of their own, in accordance with the California Integrated Waste Management Act (Assembly Bill 939). The Act requires cities and counties to adopt and implement waste diversion programs for source reduction, recycling, and composting. The Reduced Project Size Alternative would help the County to meet some of its immediate waste diversion goals; however, it would not support growth in the region, as would the Proposed Project, which could accommodate two times more compost per year at some future time when Phase 2 would be implemented based on County need.* *In addition, the Bay Area produces approximately 160,000 dry tons of biosolids annually. There are currently no composting facilities in the Bay Area that can use biosolids as a feedstock. Again, the Reduced Project Size Alternative would be able to accommodate the immediate need for processing of biosolids, but would likely be unable to meet the needs of the County and other communities in the Bay Area under projected growth projections discussed above.*

					Per conversations with StopWaste on the Jess Ranch Partial Recirculation Document, the County will condition the Proposed Project on the need for additional approvals from regulators if the Project exceeds 500 tpd. The County and Applicant have agreed to share draft conditions of approval with StopWaste before the conditions are finalized. Conditions will include Project information, such as design and permitting requirements, that will help to address some of StopWaste's concerns, if any, on the Proposed Project. Once CEQA documents are adopted and all local approvals and permits have been granted, the Applicant will work with StopWaste to start the CoIWMP amendment and conformance finding process.