

<b>Author</b>	<b>Letter No.</b>	<b>Comment No.</b>	<b>Comment Text</b>	<b>Resource/Section</b>	<b>Comment Response</b>
<b>Contra Costa Water District</b>	<b>6A</b>	1	Page 2-1, Section 2.1: Introduction to the Composting Process: Please clarify in this section what type of the two composting methods described are proposed at the site, or if both types will be used.	Project Description	<i>This section is intended as a general overview of the composting process. Section 2.2.3 provides the detail for the Proposed Project facilities. As discussed in 2.2.3, the project will utilize an aerated static pile technology that would utilize either positive and/or negative aeration.</i>
<b>Contra Costa Water District</b>	<b>6A</b>	2	Page 2-11, last sentence of page, and Page 2012, first sentence of page, incorrect statement about existing building removal at CCWD parcel: This sentence states that "The CCWD parcel contains a temporary modular residence that will be removed from the site in 2019, as well as a service center structure for wind turbine operators." CCWD is not aware of any proposed removal of this residence, so please confirm. If this residence is to remain, the inhabitants of this residence must be considered a sensitive receptor in the FEIR.	Project Description	<i>The document has been revised to remove reference to the modular residence being removed. The residence was included in analysis as a sensitive receptor for both noise and odor (Air Quality). The FEIR will identify the residence as being on Water District property.</i>
<b>Contra Costa Water District</b>	<b>6A</b>	3	Page 2-14, second and third paragraphs, Discussion of "full build out": This section states that "as market needs determine, the facility would be further developed to full build out, supporting a maximum throughput of up to 1,000 (tons per day) TPD." Please give a better estimate when full build-out is expected, and also clarify what the expected lifetime is of this project (i.e., in perpetuity?).	Project Description	<i>The full build-out of the project will be determined by the need to meet local demand for processing of organic waste. The construction schedule in the project description (page. 2-11) states that Phase 2 would be built as early as Spring 2022, but could be longer based on market conditions. Maximum throughput is therefore expected in the Spring of 2022. All studies and impact analyses are based on the 1,000 ton per day scenario. It is expected that the project will be in operation for a minimum of twenty years.</i>
<b>Contra Costa Water District</b>	<b>6A</b>	4	Page 2-16, Figure 2.2-4 Site Plan (Overview) and figure 2.2-5 Site Plan (Detail): These graphics do not show all the site features that are listed on pages 201 and 202, and on other pages as listed in the comments below. Please develop a graphic for the FEIR that shows all site features in detail, including those that are in the conceptual stage. We note that Figure 2 shown in the Notice of Preparation has a lot more detail and shows how these site features were conceptualized at that time.	Project Description	<i>Figure 2.2-4 has been replaced with Figure 2 used in Notice of Preparation for clarification. In addition, Figure 2.2-3 has been updated clarify more detail on existing and new roads.</i>

<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>5</p>	<p>Page 2-6, Construction Staging and Access, third paragraph, Use of Existing Offsite Road: This section states that "The offsite road shares an easement with Contra Costa Water District and would be utilized only temporarily during the early portion of Phase 1 construction. A new access road would be constructed to avoid crossing Contra Costa Water District property during construction of the facility." The DEIR does not contain a graphic that shows this new road in detail, so it is difficult to determine if the security and ease of access issues raised in CCWD's NOP comment letter have been addressed. Please provide a figure in the FEIR that shows exactly how these offsite improvements would look and demonstrate how the access issues identified in the NOP are addressed.</p>	<p>Project Description</p>	<p><i>Figure 2.2-3 has been updated to clarify roads' detail. Further, the text has been updated to more clearly state limitations on use of existing access road and plans for the new road.</i></p>
<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>6</p>	<p>Page 2-12, first paragraph, Temporary Access Road: This section states that "The CCWD parcel is currently accessed by a number of vehicles daily. An easement shared with the CCWD would be used as part of the Proposed Project only during pre-construction as a temporary access road. Access to the Project site during construction and operations would be through use of a new road that would be constructed as part of the project." However, there is no further discussion on how exactly this would work, so please describe the temporary access road completely including frequency and duration of use, types of vehicles, etc. Additionally, the temporary construction road should be shown on a figure in the FEIR in a large enough scale and detail so that CCWD can determine if this new road would affect current access and/or grazing operations at our Grant Line Road parcel. Since the full effects cannot be determined at this time, the Project Proponent should be required to coordinate with CCWD in advance of any use of the shared easement for pre-construction purposes, and to commit to repair, restore or make whole CCWD for any impacts associated with this use.</p>	<p>Project Description</p>	<p><i>The document has been amended to clarify language that the existing temporary access road will not be used for construction equipment or large semi-trucks. Further, the temporary access road will be used only for site visits by consultants and contractors (biologists, engineers, etc.) traveling in automobiles or pickup trucks. During this temporary use, all gates will be opened and then immediately locked to prevent livestock from escaping fenced pastures. As noted in response to Comment 5 above, DEIR text has also been updated to more clearly state plans for the new road. There is an existing 60-foot joint access easement to the Jess Ranch property and the CCWD property off Grant Line Road. The Project Proponent will have to negotiate an agreement with CCWD to ensure that the project does not impact CCWD's access to its' property, grazing operations, or habitat conservation. Since the existing access easement is undivided, the parties must mutually agree on how the easement is shared.</i></p>
<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>7</p>	<p>Page 2-16, Figure 2.2-3, Separate Entrances to Site: It is difficult to see in this graphic how the separate entrance to the site will laid out. Please provide a detailed drawing that shows both the existing and proposed entrances to the site.</p>	<p>Project Description</p>	<p><i>Figure 2.2-3 has been updated to clarify roads' detail. Further, the text has been updated to more clearly state limitations on use of existing access road and plans for the new road.</i></p>
<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>8</p>	<p>Page 3.14-33, New 20-foot Wide Access Road: This discussion states that "(a) new 20 feet wide main access road would be constructed to support the Proposed Project. The main access road would have one access connection onto Jess Ranch Road, a road shared with the windmill farm maintenance building and windmill access." Please show this on a new Figure in enough detail so that CCWD can determine if this new road will negatively affect existing Grant Line Road parcel habitat management and grazing operations. If CCWD determines that any new access road would hinder our ability to manage this parcel, the Project Proponent should be required to coordinate with CCWD and to resolve all potential issues in advance of project approval.</p>	<p>Project Description</p>	<p><i>Figure 2.2-3 has been updated to clarify roads' detail. Further, the text has been updated to more clearly state limitations on use of existing access road and plans for the new road. Please see response to Comment 6A-6. There is an existing 60-foot joint access easement to the Jess Ranch property and the CCWD property off Grant Line Road. The Project Proponent will have to negotiate an agreement with CCWD to ensure that the project does not impact CCWD's access to its' property, grazing operations, or habitat conservation. Since the existing access easement is undivided, the parties must mutually agree on how the easement is shared.</i></p>

<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>9</p>	<p>Page 2-16, second paragraph, Water Demand and Supply: This section states that "The Proposed Project would utilize biosolids for feedstock as one of the primary feedstocks in the process, which contain approximately 80 percent water." CCWD is concerned that any new addition of water to the site in the Primary Compost 1 Area and Primary Compost 2 Area, which are upslope and adjacent to the Grant Line Road parcel could enter the Grant Line Road parcel, either as surface or sub-surface flow, causing a change in either vegetation type and/or abundance or a change in moisture in the soil. CCWD and its tenant currently have issues with controlling weedy nonnative plant material on the Grant Line Road parcel (mostly Brassica species, as noted on page 3-6.10 of this DEIR) and this existing situation could be further exacerbated by adding more water to this slope. In addition, the addition of water to any slopes within the Grant Line Road parcel could change how wet the slopes are. This change could negatively affect grazing practices. Finally, the addition of more water, either surface or sub-surface, to these slopes could affect slope stability and cause erosion. These issues need to be analyzed in the Final EIR.</p>	<p>Hydrology</p>	<p><i>Hydrology and Water Quality was analyzed in Section 3.10 of the Final EIR. As disclosed in the analysis of HWQ-2 on page 3.10-8 of the DEIR, the project's catchment basins would be lined to prevent contents from percolating to the groundwater, and no discharge from the recycling basin system would be allowed by the regional water board. (For an illustration of the location of the catchment basins at the Project site, please see Figure 2.2-4 in the Draft EIR.) Meanwhile, the composting pad and processing area would be constructed of concrete, asphalt, or compacted cement that would meet regional water board requirements for permeability, causing storm and operational waters to flow off the pad to the perimeter drainage ditch that would feed the catchment basins.</i></p> <p><i>Additionally, pursuant to Mitigation Measure GEO-1, the condition of all surfaces related to operations on the site, including at the active composting pad, curing area and storage pads, shall be inspected on a monthly basis (the condition of the catchment basin liner shall be inspected on an annual basis). The results of the inspections shall be recorded on an appropriate data form. Any cracking in pavements or liners, potholes, wheel ruts, or other conditions that could cause ponding on the active surfaces, lead to damage to facilities or structures, or allow infiltration of runoff into the subsurface shall be noted and corrective action initiated within seven days. (See Draft EIR at p. 3.8-10.)</i></p> <p><i>Finally, HWQ-3 provides an analysis for offsite drainage and states, "Construction of the Proposed Project would introduce new structures and features to the Project site which would alter the existing drainage pattern. However, the Proposed Project has been designed to divert and contain all Project generated storm water runoff, thereby preventing any offsite discharges. " The Proposed Project's impact related to alteration of the existing drainage pattern would be less than significant.</i></p>
<p><b>Contra Costa Water District</b></p>	<p><b>6A</b></p>	<p>10</p>	<p>Page 3.5-24, Concern about nonnative mustard expanding onto Grant Line Road Property: It is assumed in the DEIR that the composting process will heat up the incoming compostable material to a temperature high enough to kill any weed seeds. And while Mitigation Measures Bio-21 and Bio-22 address the spread of nonnatives from proposed construction activities, there are no mitigation measures in the DEIR that specifically address the spread of windborne weed seeds during the operation stage of the project (seeds that could be transported in the trucks carrying the incoming material or during the initial stages of windrow composting operations before the material heats up adequately). Please edit Mitigation Measure BIO-21 to ensure that reseeded to discourage nonnative plant establishment at the site will also occur during the life of the project. This needs to be done in terms of both controlling existing nonnative black mustard and discouraging other nonnative invasive species into newly graded areas of the site that could occur as a result of operating the facility. Please edit BIO-22 to include monitoring of all active areas at the site to ensure that other nonnative plants do not get established during the life of the project.</p>	<p>Biology</p>	<p><i>The commenter is correct regarding missing language Mitigation Measure BIO-21 and BIO-22 that addresses the windborne and mechanical spread of non-natives for the life of the Project. Text has been revised to include:</i></p> <p><i>BIO-21: "To discourage the introduction and establishment of invasive plant species, seed mixtures/straw used within natural vegetation would be either rice straw or weed-free straw and will occur as necessary throughout the life of the project. Any invasive mustard (family Brassicaceae) identified within the project area will be removed prior or during construction of the facility. Invasive plant material removed during work activities shall be bagged and appropriately incinerated or disposed of in a landfill or permitted composting facility."</i></p> <p><i>BIO-22: "All exposed and/or disturbed areas resulting from project-related activities shall be returned to their original contour and grade, and restored using locally native grass and forb seeds, plugs or a mix of the two. Areas shall be seeded with species appropriate to their topographical and hydrological character. For example, temporarily disturbed seasonal wetlands shall be seeded with native hydrophytic species typical to the region; whereas upland areas shall be seeded with an upland grass and forb mix. Seeded areas shall be covered with broadcast straw and/or jute netted, where appropriate. Project sites would be revegetated with an appropriate assemblage of native riparian wetland and upland vegetation suitable for the area. A species list and restoration and monitoring plan would be included with the Project proposal for review and approval by USACE, USFWS, and/or CDFW as appropriate. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work would be done, duration and frequency of work, identifiable success criteria for completion, monitoring protocols, and remedial actions if the success criteria are not achieved. "</i></p> <p><i>Further, additional language was added to BIO-20: "Prior to any vehicles and equipment entering a project site, a qualified biologist would perform an inspection for invasive plant species. All visible soil, plant materials, animal remnants, or any other signs of invasive species on vehicles and equipment shall be removed prior to entering the project site. Removal and decontamination requirements of vehicles and equipment shall be up to the discretion of the qualified biologist. Additionally, if a vehicle or piece of equipment must leave the project site for any length of time and has been exposed to a different project site or location, it will be required to be re-inspected prior to re-entering the project site. Vehicles would be washed only at approved areas. No washing of vehicles would occur at job sites."</i></p>

<p>Contra Costa Water District</p>	<p>6A</p>	<p>11</p>	<p>Discussion of Introduction of Pathogens from Compost Facility to CCWD Parcel: Mitigation Measures HAZ-1 and HAZ-4 addresses the potentially significant impacts from the composting activities that could affect human health, either in sampling composts for pathogens and heavy metals (at Mitigation Measure HAZ-1) or reducing exposure to bioaerosols by reducing particulate matter emissions (at Mitigation Measure HAZ-4). However, contaminants from composting activities or exposure to bioaerosols could also have impacts to cattle and/or amphibians. Please work with the Resource Agencies (e.g., US Fish and Wildlife Service, California Department of Fish and Game) to ensure that these mitigation measures satisfy parameters for special-status species (specifically amphibians) and cattle, especially those that will be consumed by humans for food.</p>	<p>Hazards</p>	<p><i>The USFWS and CDFW operate under the federal and state endangered species acts respectively. Both of these regulations are specific to the “take” (e.g., harm, harass, kill) of individuals and their habitats, but does not regulate contaminants alone; therefore, there is no regulatory mechanism to consult with USFWS or CDFW with regards to contaminants associated with the proposed project. As discussed in Section 3.5, Biological Resources, impacts on federal and state-listed wildlife would be considered fully mitigated by both agencies through compliance with and participation in the East Alameda County Conservation Strategy, as proposed in the EIR. Please also refer to Mitigation Measures BIO-11, BIO-12, BIO-13, HAZ-1 for information.</i></p> <p><i>In order to reduce adverse effects from pathogens, the proposed project would comply with State and federal regulations pertaining to pathogen reduction. Compliance with these regulations would ensure that pathogens are reduced to safe and acceptable levels. Under the U.S. EPA Part 503 regulations Appendix B (40 CFR Part 503), composting operations under the Proposed Project must meet the requirements of Processes to Further Reduce Pathogens (PFRPs). To be considered a PFRP, under Part 503, the composting operation must meet the following operating conditions:</i></p> <ul style="list-style-type: none"> <li><i>• “Using either the within-vessel composting method or the static aerated pile composting method, the temperature of the sewage sludge is maintained at 55 degrees C (131 degrees F) or higher for 3 consecutive days.</i></li> <li><i>• Using the windrow composting method, the temperature of the sewage sludge is maintained at 55 degrees C (131 degrees F) or higher for 15 consecutive days or longer. During the period when the compost is maintained at 55 degrees C (131 degrees F) or higher, there shall be a minimum of five turnings of the windrow.”</i></li> </ul> <p><i>California regulations (Title 14, California Code of Regulations, Section 17868.3) require that commercial compost producers follow specific procedures to demonstrate adequate pathogen reduction. These requirements are based on U.S. EPA regulations (40 CFR Part 503), described above.</i></p> <p><i>Additionally, the State Water Resources Control Board Order WQ 2015-0121-DWQ addresses General Waste Discharge Requirements for Composting Operations. The General Order includes best practicable treatment or control (BPTC) measures that can prevent or limit degradation of water quality from pathogens and other contaminants. The proposed project would implement relevant BPTC measures thereby further reducing pathogens to an acceptable level and protecting water quality. The General Order also acknowledges the benefits of composting and states,</i></p> <p><i>“Benefits of using compost include increasing soil water holding capacity, adding beneficial micro-organisms to improve soil health, improving soil tilth, and carbon sequestration. Considering these benefits, the State Water Board finds that composting in compliance with this General Order is consistent with the maximum benefit to the people of the state.”</i></p> <p><i>Compliance with these State and federal regulations would effectively reduce pathogens associated with the proposed project.</i></p> <p><i>As discussed in Section 2.2, Overview of the Proposed Project, the Proposed Project would utilize an aerated static pile (ASP) system technology for the active composting phase, using positive aeration, negative aeration or a combination of both. The Proposed Project may also use microporous fabric covers or biocovers placed over active composting piles to reduce emissions necessary to meet the Bay Area Air Quality Management District (BAAQMD) emissions requirements. These measures would also reduce bioaerosols. Further, as discussed in Chapter 2, Project Description other methods to reduce bioaerosols include the following:</i></p> <ul style="list-style-type: none"> <li><i>• Maintenance of windrows in aerobic condition; through regular aeration and mixing;</i></li> <li><i>• Maintenance of windrow moisture content;</i></li> <li><i>• Maintenance of windrow temperatures of at least 131 degrees F throughout the pathogen reduction period, as required by 14 CCR §17868.3; and</i></li> <li><i>• Control of dust generation through regular application of water.</i></li> </ul>
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					<i>In summary, implementation of these measures and compliance with relevant State and federal regulations would reduce pathogens and bioaerosols to acceptable levels.</i>
<b>Contra Costa Water District</b>	<b>6A</b>	12	Page 3.9-11, Mitigation Measure HAZ-3, Vector Control Plan: CCWD would like to see this Vector Control Plan before this project is approved.	<b>Hazards</b>	<i>A Vector Control Plan is required to be submitted and approved prior to approval of the operational permits for the project. Mitigation Measure HAZ-3 describes performance standards and best practices that will be utilized by the Vector Control Plan. Project operators will work collaboratively with community stakeholders to ensure the successful implementation of the Vector Control Plan.</i>
<b>Contra Costa Water District</b>	<b>6A</b>	13	Section 3.16, Wildfire: This section is not contained in the DEIR document linked to the County's website. CCWD is concerned not only about heat generated by the composting process, which could be combustible, but also about the proposed compost facility's fire suppression systems. It should be noted that the Altamont Pass area is windy and subject to frequent grass fires typically caused by motorists on Highway 580. This facility needs to have a robust fire safety and suppression system, and it needs to be described and analyzed in this environmental document.	<b>Wildfire</b>	<p><i>Section 3.16 has been removed from the DEIR, because Wildfire was fully considered by Alameda County and all impact criteria were dismissed from further detailed evaluation because no adverse impacts were identified that could potentially occur as a result of the Proposed Project. This finding is discussed in Section 3.2.11.</i></p> <p><i>With respect to the district's comment regarding 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,</i></p> <p><i>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. which mandate protection and control measures that include (but are not be limited to): temperature monitoring; limits on composting, 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.</i></p> <p><i>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 wastestream, which currently is underserved, as discussed in the DEIR's project description and elsewhere in the DEIR's responses to comments.</i></p>

<b>Contra Costa Water District</b>	<b>6B</b>	1	CCWD commented on the DEIR on January 13, 2020, during the public comment phase. This comment letter is attached. CCWD has reviewed the RDEIR and finds that none of the analysis contained in the RDEIR affects our comments as contained in this letter. We look forward to reviewing a Response to Comments document/Final EIR that addresses our comments and resolves the issues raised in that letter.	General	<i>Please refer to responses to Comments 6A-1 through 6A-13 for responses to CCWD's comments on the DEIR in your letter dated January 13, 2020.</i>
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