



**City of Pittsburg**  
65 Civic Avenue  
Pittsburg, California 94565-3814

May 18, 2021

Clerk of the Board  
Contra Costa County Board of Supervisors  
Supervisor John M. Gioia, District I  
Supervisor Candace Anderson, District II  
Supervisor Diane Burgis, District III  
Supervisor Karen Mitchoff, District IV  
Supervisor Federal D. Glover, District V  
Board Chamber, Administration Building  
1025 Escobar Street  
Martinez, CA 94553

Re: Item D.2 – Hearing to Consider Accepting a Permit Review Report for the Keller Canyon Landfill Land Use Permit, as Recommended but the County Planning Commission

Honorable Members of the Board of Supervisors:

The City of Pittsburg appreciates that the front cell at Keller Canyon Landfill (KCL) has been temporarily closed pending permanent closure. It has decreased odors as we stated it would in previous comments to the Board and the Planning Commission. This has benefitted the community.

However, the City is still highly concerned about the following issues regarding the review of Keller Canyon Landfill's Land Use Permit:

- Visual Issues (Conditions 22.1-22.4 of the Land Use Permit); A select number of trees were planted to try and screen activity at the landfill, but a number of trucks can be seen daily driving up the side of the landfill, parked, waiting to offload and dumping material on the landfill area above the closed front cell above the berm. It can be seen from many different angles and is unsightly for our community. Page 1-139; of the Environmental Impact Report, Impacts and Mitigation Measures states "Landfill activities, such as the dumping of waste material and operations involving compacting and covering waste material would not be visible to the public."
- Dust & Litter: As a result of the dumping activity visibly occurring, dust and litter can be seen escaping the working face at the landfill where material is being dumped.
- Contingency Program (Condition 20.8): Keller Canyon Landfill 'Litter Control & Prevention Plan' has a high wind controls measure to monitor and manage litter

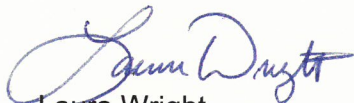


which also included temporarily suspending the acceptance of refuse. The Plan needs to be reviewed to see if KCL is following the procedures and how often the form is being completed documenting their efforts. In addition, with the PG&E Public Safety Power Shutoffs conditions raising concerns with additional events predicted this year, operations and procedures warrant review to ensure conditions at the landfill are operating in accordance with local criteria for the safety of the community.

- Radiological Testing: The City of Pittsburg respectfully disagrees with the recommendation of not conducting environmental field samples for radiological material from Hunter's Point Naval Shipyard. Contaminated material was documented as being received whereby the documents indicated it was clean. Only by chance, was the mistake caught and then the contaminated material removed and excavated from the landfill when these errors were discovered. Other contaminated loads could have been received and buried and noted as clean in the documents. Therefore, sampling should be conducted for the safety of the community.
- Contaminated Soil: Lastly, the City hopes the large quantity of contaminated soil KCL is accepting, as described and stated in the November 9, 2020 Community Meeting as daily cover, is adhering to the strict acceptance criteria as outlined in Keller Canyon Landfill's Bay Area Air Quality Permit.

Based on these issues above, the City requests that the review timelines be annual before the Board of Supervisors and not just the Planning Commissions. This will be more critical with the updated EIR being prepared to expand the operation at Keller Canyon Landfill. The updated Land Use Permit should have many of these conditions as well as new ones identified to be more respectful of environmental impacts that the community has to endured with its close operation proximity as well as have these be reviewed and reported annually to the Board of Supervisors.

Respectfully,



Laura Wright  
Environmental Affairs Manager

cc. Mayor Marilyn Craft  
Vice-Mayor Holland Barrett White  
Councilmember Jelani Killings  
Councilmember Juan Antonio Banales  
Councilmember Shanelle Scales-Preston  
Garrett Evans, City Manager