

Green Coalition for Responsible Waste / Resource Management

Summary of Significant Concerns about the Redwood Landfill Expansion Plan and Its Final Environmental Impact Report

The Redwood Landfill is 220 acres of garbage piled 70 feet tall (which will grow to 166 feet). It is below sea level, in a floodplain, in contact with groundwater, on old tidal channels and Bay mud subject to liquefaction, and between two faults that experts predict will have more than a 99% change of at least a 6.7 earthquake within the next 30 years. Last year it suffered a significant levee failure. The dump is right next to San Antonio Creek which connects to the Petaluma Marsh and River Estuary, and the Bay.

Although Waste Management, Inc. (WMI), the multinational corporation that owns the dump, has refused to put forth many of the specifics of its expansion project until after environmental review approval, the Final Environmental Impact Report (FEIR) states that expansion would permit the dumping of over 6 million more cubic yards of garbage on this ecologically sensitive site. That almost doubles the remaining capacity and translates into almost **8 BILLION MORE** pounds of garbage.

Until Marin implements more effective resource recovery and waste reduction programs, we need some place to put our trash which can't be reused, composted, or recycled. However, the FEIR shows that dump expansion would result in substantial threats and risks to the environment and human health. Many of the most important mitigation measures would not even be attempted until years after the expansion is approved. This is a reckless approach to risks and is inconsistent with Marin County's obligation to act as a responsible steward of the environment in the public's interest. Simply phrased, it puts the cart well before the horse. In sum, the FEIR is inadequate and should not be certified as final for giving a green light to expansion moving forward.

1. The County Would Allow Expansion – Dumping about 4 Million More Tons of Waste – Without Fully Addressing the Significant Risks to Environmental and Human Health

The FEIR identifies the following major threats to the environment and human health:

- significant increase in cancer-causing toxic air contaminants from trucks and equipment operation,
- the doubling of greenhouse gas emissions from dangerous methane gas that is generated by oxygen-starved decomposition of green and organic materials buried on the site instead of composted for external soil replenishment,
- the threats to surrounding wetlands from polluted “leachate,” a potentially toxic liquid that oozes from the rotting trash heap which is already in contact with groundwater in violation of state law operational requirements,
- Significant questions about the seismic stability of the steep slope that would be created to pile the additional 5 millions tons of waste up to 166 feet high,
- the inadequacy of the old levees – some of which are only 5 feet tall – and the resulting threat to surrounding wetlands from global warming-induced sea-level rise, storms and flooding.

The FEIR, to its credit, recognized these risks and deficiencies. For example, it says:

“If Global Warming Climate Change also causes an increase in the intensity and frequency of severe storms and flooding, the [landfill levees] may be inadequate to protect the site from flooding and from damage to essential environmental control systems.” **FEIR Amendment at page 2-50.**

“[Landfill design] is not consistent with ... seismic requirements” under state law. **FEIR Amendment at page 2-56.**

“Much of the base of the landfill, that is, where refuse contacts the underlying material, is already below sea level, and in contact with groundwater.” **FEIR Amendment at page 3-229.**

The fatal flaw, however, is that the FEIR requires WMI to perform more study and analysis of these risks and to understand them better before actually addressing them. And it allows those studies and analyses to be performed after dump expansion is approved and “vested” in the applicable permits. Cart before horse.

It is a wholly insufficient approach to protect the public interest and the environment, especially given WMI’s track record of deferral and delay. For example, although WMI was required to rebuild the old levees and complete a leachate containment system years ago, it failed to do so. This in part is why WMI has had to apply to change its permit.

2. Redwood Landfill Would Continue to Increase Its Negative Impact on Global Warming

According to the FEIR:

“[T]he issue of global climate change [has] potentially dire consequences for humanity and life on earth.... Under [the expansion] the landfill will emit about twice the amount of Greenhouse Gases in 2020 as it did in 1990.” **FEIR Amendment at page 2-78.**

The risk mitigation prescribed is for WMI to develop a Greenhouse Gas reduction plan to demonstrate how the dump will achieve by 2020 a reduction to 15 percent below the 1990 levels and identify funding sources to achieve it. Problem: it doesn’t have to do this until two years after expansion approval. Cart before horse.

More landfill gas is created by continuing to bury green and organic materials with the rest of the garbage. This includes the dump’s request to use up to 300 tons of organics per day as “daily cover,” which is subsequently buried. Landfill gas consists of carbon dioxide, toxins, and methane gas – the major component. Because methane is 23 times more heat-trapping than carbon dioxide, it has a much greater effect on global warming.

Although the expansion would continue to enable composting on site, there is no requirement that the dump and its users separate and divert all green materials to a dedicated composting facility using the latest technology, or for WMI to sell the compost to replenish depleted soil elsewhere. Instead, the limited number of non-trash hauling

trucks that would be allowed onto the site coupled with the dump's practice of using the vast majority of compost for "erosion control" at the landfill will result in the status quo.

The FEIR does call for the future development of landfill gas-fired engines to generate electricity. But this is not the same as "green renewable" energy. A potential problem is that, unless more efficient gas wells are installed to capture the methane, and unless organic and green materials and moisture are kept out of the trash heap as much as possible, there could be a net increase in harmful methane generation that escapes into the atmosphere. Again, there is no concrete plan or conditions. Cart before horse.

3. The Expansion Plan Inadequately Addresses the Need to Reward Resource Recovery and Composting to Reduce Waste.

The FEIR sets forth an important aspiration to change the focus at the Landfill from increasing waste disposal capacity to diversion of materials. Regrettably, while it would increase waste disposal by some 5 million tons it does not include, and fails to require, any concrete plan to create a resource recovery park. Moreover, although for years Marin County has stated that part of any expansion proposal should be a waste mitigation fee on each ton dumped to fund zero waste programs, the FEIR Amendment includes no requirement that such a fee be enacted prior to project approval. Cart before horse.

4. The Expansion Plan Does Not Meet the Requirements of the Green Coalition's Four Principles

We will continue to insist that any expansion plan satisfy our Four Principles:

1. **Ban Green and Organic Waste from the Dump, and Convert it to a Resource in a Manner that Reduces Greenhouse Gas.**
2. **Require strong Earthquake, Groundwater, and Flood Protections at the Dump (before approving any expansion).**
3. **Adopt a Mitigation Fee to Discourage Waste, to Fund Zero Waste Initiatives, and to Pay for an Independent Monitor who Reports to the Community (and helps assure implementation of the dozens of mitigation measures).**
4. **Insist on a Real Financial Guarantee for the Inevitable Toxic Clean-up (so taxpayers don't get stuck with the bill).**

The FEIR Amendment does not address all of our concerns. While pointing out significant risks to the environment and human health, it passes the buck until future years how those risks can be addressed. This is contrary to California environmental law. The Marin County Planning Commission and Department of Environmental Health Services must insist that these deficiencies be addressed before the FEIR is certified as final, and before any expansion of permitted volume is approved.

Members of the Green Coalition for Responsible Waste / Resource Management include: Sierra Club Marin Group, Sustainable Novato, Sustainable San Rafael, Sustainable Petaluma, Sustainable Marin, Friends of the Petaluma River, Madrone Audubon, The Bay Institute, Baykeeper, No Wetlands Landfill Expansion, Novato Democratic Club, Petaluma Tomorrow, Democracy for America, Green Builders of Marin, Friends of Novato Creek, Seniors for Peace, Grey Panthers of Marin, Environmental Action Committee of West Marin, Petaluma River Council, Daily-Acts, Novato Live Well Network, Green Gate, 6th Assembly District Democrats, Democratic Central Committee of Marin, and Sustainable Fairfax.