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EL DORADO COUNTY
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Chuck Wolfe

PO Box 664

El Dorado CA 95623

ctwolfe@hughes.net

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El Dorado County Environmental Management
2850 Fairlane Court, Building C
Placerville, CA 95667

LATE DISTRIBUTION

Date 8:44 am, Jan 31, 2012

Re: El Dorado County Solid Waste Management Plan

I am encouraged that El Dorado County is moving towards completion of a solid waste management plan and commend those who have given their time in this endeavor. In reviewing this plan I am concerned with some elements and details. In particular I am concerned that there is no emphasis on securing a permanent waste site. This plan uses the Union Mine Landfill as a fall back for this inadequacy. I have many concerns about this option including public safety, environmental risk and higher costs.

Public Safety

Union Mine Road, being the only access road to this site, needs major improvements to safely accommodate any increase in transfer vehicle traffic. When the EIR was prepared for the landfill expansion, conditions in the area were different. There are more homes in this area now and many planned residential developments in the area sharing access from Union Mine Road. Union Mine High School did not exist at that time. A new EIR needs to be drafted that addresses these changes.

When the expansion of the facility was undertaken in 1994, the southern extension of Church Mine Road was eliminated. This road acted as a route to the southern extension of Union Mine Road, allowing access to southern Hwy 49, for commuters and residents from Little Canyon Road, Martinez Creek Road and Church Mine Road. This route was also a safety escape during floods and fire for these same residents. Now there is only one exit available to residents and this increases the fire danger and creates a very dangerous intersection at Union Mine Road and Church Mine Road. Residents wishing to go south on Union Mine from Church Mine or West on Church Mine from Union Mine are forced to make a three point turn between two blind corners on Union Mine Road. I have witnessed many incidents where this condition has created dangerous situations for residents. These incidents include Deadman Creek bridge washout, hillside mudslide onto Church Mine Road near the intersection with Union Mine Road and several fires on the BLM land that closed the road to residents. The closure was not due to fire danger. The closure was due to fire trucks parked in the road. During emergencies residents need acceptable access to the properties beyond the closure to care for family, farm animals and property safety. This unsafe condition is a result of the closure of Church Mine Road. Before any increase in transfer vehicle traffic on Union Mine Road, the former extension of Church Mine Road should be reopened, or replaced, or the intersection at Union Mine should be replaced with a safe alternative and both Union Mine and Church Mine Road should be widened.

The increased pedestrian traffic as a result of the Union Mine High School has created a major safety issue in the area along Union Mine Road in both directions from the school. The road is already too narrow, winding and has no place for walkers. The cross-country runners from the high school run right down the road. Walkers have to step into the ditch when cars approach. I have witnessed several close calls for pedestrians in the area where there is only inches between the road and the redwood fence.

The California Highway 49 Realignment and Widening Initial Study, mitigated the exclusion of bicycle lanes on the highway 49 widening project, by claiming.

The El Dorado County Bicycle Transportation Plan adopted in 2005 does not propose bicycle facilities along SR 49 through the project area. The Plan's emphasis for this part of the county is on making Union Mine Road, which runs parallel to SR 49 in this area, a Class III Bike Route. A Class III Bike Route provides a right-of-way designated by signs.

This improvement should have been undertaken when the school was built and is needed even more now and certainly a road widening project should be accomplished before any increase in transfer vehicle traffic

on Union Mine Road. Road widening to provide for safe pedestrian traffic is way overdue and needs to be top priority in any plan to continue to use Union Mine Landfill

Environmental

The Union Mine Landfill is one of the environmentally worst sites to place a disposal facility, of those available to the residents of El Dorado County. The area after the mining operations ceased should have been declared a superfund site, on that basis alone. Positioning a dumpsite over the top of these mine shafts, that reach several thousand feet into the earth with many miles of connecting tunnels and significant stopes, allows this accumulated pollution to infiltrate the water table at many depths. The positioning of this site over the top of a collision contact zone of two dissimilar landmasses, the Melones Fault, further complicates and promotes the spread of this pollution. The steepness and close proximity to watershed that eventually feeds into the Cosumnes River insures that spills and leaks will enter the water supply of areas downstream.

Significant environmental concerns were raised by the EIR prepared for the previous landfill expansion, which included, "biological resources, geology and soils, air quality, hazardous materials and infectious waste, human health and safety, aesthetics and visual resources." These were mitigated by stating that the "benefits identified outweigh the unavoidable adverse environmental effects which may then be considered (acceptable)." That needs to be compared to other available sites. Accepting the worst choice because some remedy is needed and society will suffer without making a choice but not assessing the risks and comparing it to those of other sites is unacceptable. The only comparisons that I have seen are based on cost not environmental risk. A new EIR needs to be prepared that compares the environmental risk of this site with other available sites throughout the county. Placing any processing operations on the site will produce pollution in the form of increased dust, CO₂, NO_X and noise and will require extensive mitigation monitoring and implementation of effective controls. The results of the monitoring should be made available to the public and nearby residents on an ongoing basis.

Higher Costs

The remote placement of the Union Mine Site is a great distance from the sources of solid waste and therefore adds to transportation costs and greenhouse gas emissions. The site is about a thousand-foot drop in elevation from the surrounding areas also adding to fuel cost and greenhouse gas emissions for the transfer vehicles. This is in contradiction to goal 4 of the plan to "reduce greenhouse gas emissions." There are better sites available in the county and they are closer to the source of the solid waste and closer to other infrastructure, (freeway, railroad, water, sewer, and electric transmission lines). These sites are on less permeable soils and more stable geologic conditions. These sites will not be as available in the future because of planned and anticipated growth. A permanent site should be planned for and procured or set aside now. It will only be more expensive in the future.

In conclusion, I understand that some use of the Union Mine Landfill Site in the future is predictable. For that to happen there needs to be real mitigations, not negative declarations, real measures that provide real safety for the area residents and for the environment. This use of Union Mine Landfill should only be seen as temporary and contingent upon procurement of a permanent and more appropriate site.

I anticipate that this statement will be reviewed by staff and passed on to the Board o Supervisors and be made a part of the discourse in future solid waste management planning.

Sincerely
Chuck Wolfe