



**COLUSA COUNTY CITIZENS FOR  
SAFE WATER**

[www.savesacvalleywater.com](http://www.savesacvalleywater.com)

P.O. Box 1807

Williams, CA 95987

VIA HAND DELIVERY

January 10, 2008

Karen E. Flores  
Director, Wintun Environmental Protection Agency  
P.O. Box 1630  
Williams, CA.95987

Re: Request for a 60-day Extension of the Monitoring and Compliance  
Plan Comment Period

Dear Ms. Flores:

I am writing on behalf of *Colusa County Citizens for Safe Water*, also known as **CCCSW**.

On December 19, 2007, the Wintun Environmental Protection Agency ("WEPA") made the *Cortina Integrated Waste Management Landfill Monitoring and Compliance Plan, Revised Version 2.0* (the "MCP") available for public review and issued a notice in the Colusa County Sun-Herald that commenced a thirty day public comment period on the MCP. By this letter, we request that WEPA extend the comment period by 60 days to allow adequate opportunity for public comment. Extending the comment period will help assure that WEPA has the full benefit of the public's input in its decision-making on the MCP. Furthermore, since all of the required approvals and waivers as identified in the project's Environmental Impact Statement (EIS) are not in place (and to our knowledge have not yet been applied for) a 60 day extension should not prejudice the project's schedule.

The size and location of the proposed project make a technically-sound monitoring plan vital. The proposed landfill, if approved, would accept 12 to 15 million tons of waste and would be located on approximately 125 acres in close proximity to sensitive environmental resources, including shallow groundwater, surface waters that are fed by groundwater discharge, protected species and habitat, and downstream and downgradient water resources. A comment period of thirty days is not sufficient for the public to adequately

review and comment on a monitoring and compliance plan for a project of this scope and magnitude, and with such great potential for environmental impacts.

The need for adequate monitoring – and for the public to have adequate time to review and comment on the project’s monitoring plan – is especially important given the potential for a leak or other liner failure. The project’s EIS indicates that the project could adversely affect groundwater if shallow groundwater impairs the integrity of the landfill containment system, if leachate escapes the leachate collection system or landfill liner, or if groundwater levels are altered. (EIS at 4.2-8, 4.2-10). The possibility of a liner failure and leachate seepage is compounded because there are active faults and potentially active faults in the vicinity of the proposed landfill. The MCP will be the primary means, if not the only means, to establish a groundwater baseline and identify groundwater contamination, as there are no groundwater wells present within two miles downgradient of the project site that could otherwise provide groundwater data. (EIS at 4.2-13).

The MCP defines an approach for monitoring groundwater, surface water, leachate, the unsaturated zone and landfill gas by establishing sampling and monitoring locations, sampling protocol, concentration limits and other technical requirements. Given the highly technical nature of the MCP, a professional with appropriate technical expertise is needed to review the MCP (and the ten additional reports and technical documents referenced in Appendix A of the MCP) before written comments can be prepared. The process of identifying such a professional and reviewing and commenting on a technical document takes more time than the thirty days established by WEPA for public review and comment.

Finally, issuing the Plan and making it available for comment just four days before Christmas – with a comment period that occurs over the Christmas and New Year’s holidays – adds to the need for an extension. During this time of year, many people travel and have professional and family obligations, which limit the public’s ability to utilize the full thirty-days to prepare comments. It is also likely that members of the public did not see the newspaper notice (or otherwise did not become aware of the comment period) until after their holiday travels, further limiting their ability to provide adequate comments. The timing of the comment period during the December holidays further supports the need for an extension

We hope that WEPA is fully committed to considering whether a landfill project should be approved, taking into account the safety of the environment and public health. Extending the comment period by 60 days will provide the

public with the time needed to prepare appropriate comments on this important monitoring plan. These comments will help to assure that the MCP is technically sound and that WEPA can fully consider the public's input when making its final decision on the MCP.

We thank you for considering our request and will follow-up with you by telephone and e-mail next week to see whether WEPA has granted our requested extension.

Again, I am signing this letter on behalf of **Colusa County Citizens for Safe Water**.

Sincerely,

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Colleen Ferrini

**Colusa County Citizens for Safe Water** Representative and Spokesperson

Cc: Elizabeth Forsyth, USEPA Tribal Solid Waste Program

Linda S. Adams, Secretary for Cal/EPA

Elizabeth Armour, USEPA Tribal Contact/Water Pollution Control

Troy Burdick, Superintendent Central California Agency, BIA

William Brittain, P.E., Water Resources Control Engineer, Land Disposal Program, California Regional Water Quality Control Board

Members, Colusa County Board of Supervisors

Members, Colusa County Citizens for Safe Water (CCCSW)

Tim Taylor, Special Counsel to Colusa County

Denise Carter, Colusa County Farm Bureau Land Use Chairman

Ashley Indrieri, Family Water Alliance

Jeff Gilbert, Williams Fire Chief

