

November 16, 2016

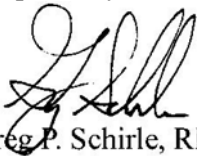
John Swiecki,
AICP, Community Development Director
City of Brisbane
50 Park Place 3
Brisbane, CA 94005

Re: Recommendations for the Baylands Post Closure Development Project on the Brisbane landfill State Clearing House Number 2006022136.

The San Mateo County Environmental Health Division has been designated as the Local Enforcement Agency (LEA) by the Department of Resource Recycling and Recovery (CalRecycle) regarding regulatory oversight of all solid waste facilities, operations and sites within San Mateo County. As the LEA, we recommend that the ownership of the Brisbane landfill model and develop, through deed restriction, an Ownership Association Board. The purpose of this Ownership Association is to require any new owner or future parcel owner of the landfill the responsibility for compliance with environmental regulatory requirements and their associated financial obligation. An example of a well-established ownership association is the Sierra Point Environmental Management Association SPEMA. However, unlike SPEMA, this Brisbane landfill ownership association covenants or bylaws would include landfill statutory and regulatory requirements for both CalRecycle and the State Water Resources Control Board such as the Closure Post Closure Maintenance Plan (CalRecycle) and Waste Discharge Requirements (SWRCB). Lastly, this proposed Brisbane Ownership Association would designate a management point of contact for receipt of written and oral correspondence from the regulatory agencies.

Thank you for the opportunity to provide this comment for your consideration moving forward with the proposed Baylands Development Project on the Brisbane Landfill SCN# 2006022136. Should you have any questions or comments regarding this letter please call or email me (650) 465-1700 or gschirle@smc.gov.

Respectfully,



Greg P. Schirle, REHS IV
Solid Waste Specialist

Cc: Sandra Estrin, Program Manager
Keith Roberson, RWQCB (e-copy)
Howard Pearce, UPC (e-copy)
Chris Gibson, Recology (e-copy)

