



August 28, 2020

9/2/2020

Governor's Office of Planning & Research

Ms. Diana Robinson, Planner III
Imperial County Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Aug 28 2020

STATE CLEARINGHOUSE

Subject: SCH No. 2020089003 – Initial Study #20-0009, Imperial Solid Waste Site
Final Closure Project, Facility No. 13-AA-0001

Dear Ms. Robinson:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Imperial County Planning & Development Services Department, acting as Lead Agency, has prepared and circulated an Initial Study (IS) and Mitigated Negative Declaration (MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The Imperial Solid Waste Site is located at 1705 W. Worthington Road, Imperial, CA 92251. The site consists of Assessor Parcel Number (APN) 034-320-050-000 and is designated as Special Purpose Facility and is zoned Government/Special Public (G-S). The site is located in an agricultural area along the eastern bank of the south to north flowing New River and surrounded by agricultural uses and the Imperial Irrigation District.

The proposed project is for the closure of the Imperial Solid Waste Site (ISWS). The property is owned and operated by the Imperial County Department of Public Works. The ISWS is located on approximately 69 acres with a total disposal area of approximately 18 acres and ceased disposal operations in July 2018. The closure will include waste relocation, cover soil import, engineered fill placement and compaction, and installation of storm water management features. The landfill has reached the permitted capacity and requires closure in accordance with Title 27, California Code of Regulations (27 CCR), Section 21110.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections, in addition to the specific location noted. Comments on the IS and MND are summarized below.

Page 3, Part B – In the paragraph under the checked box indicating a Mitigated Negative Declaration (MND) it states that "...the proposed applications will not result in any potentially significant environmental impacts..." Since an MND is deemed appropriate, it would be more accurate to state that the proposed applications could result in a significant effect, but mitigation measures are available to reduce the effect to less than significant levels.

Page 4, Part D, Section 2, II. Environmental Checklist Form – In this paragraph it lists three choices for environmental impact evaluation (significant impact, potentially significant impact or no impact). The three listed here are not the same as the four that are on the actual checklist. The choices on the actual checklist include: potentially significant impact, potentially significant unless mitigation incorporated, less than significant impact and no impact.

Page 21-22, Hazards and Hazardous Materials, Part B and C – The text is missing from these sections. In the Draft IS, Part C states, "There are no schools within one-quarter mile of an existing or proposed school." The explanation should be revised for clarity.

Page 33, Findings – The paragraph directly under the Findings heading uses the word "environmental." The word "environment" would be more accurate.

Solid Waste Regulatory Oversight

The Imperial County Department of Public Health, Environmental Health Services, is the Local Enforcement Agency (LEA) for Imperial County and responsible for providing regulatory oversight of solid waste handling and disposal activities. Please contact the LEA Manager, Jorge Perez, at 442.265.1888 or jorgeperez@co.imperial.ca.us to discuss potential solid waste requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the IS and MND and hopes that this comment letter will be useful to the Lead Agency preparing the environmental document and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public

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hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6138 or by e-mail at benjamin.escotto@calrecycle.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Benjamin Escotto". The signature is written in a cursive style with a large initial 'B' and 'E'.

Benjamin Escotto, Supervisor
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division

cc: Gina Weber, CalRecycle
Jorge Perez, LEA