



9/2/2020

Governor's Office of Planning & Research

August 28, 2020

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## STATE CLEARINGHOUSE

Ms. Jeanine Ramos, Planner I  
Imperial County Planning & Development Services Department  
801 Main Street  
El Centro, CA 92243

**Subject: SCH No. 2020089004** - Initial Study #20-0008, Hot Spa Solid Waste Site  
Final Closure, Facility No. 13-AA-0010 - Imperial County

Dear Ms. Ramos:

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 Hot Spa Solid Waste Site is located at 10466 Spa Road, Niland, California. The site consists of Assessor Parcel Number (APN) 002-040-078-000, is designated as Special Purpose Facility and is zoned Government/Special-Renewable Energy (G/S-RE). The site is located northeast of the Salton Sea shoreline with an operating RV park and spas to the east and north and Hot Mineral Spa Road to the west. The majority of the site is undeveloped open space.

The proposed project is for the closure of the Hot Spa Solid Waste Site (HSSWS). The HSSWS is located on approximately 40 acres with a total disposal area of approximately 6.4 acres and ceased disposal operations in July 2018. The landfill has reached the permitted capacity and requires closure in accordance with Title 27, California Code of Regulations (27 CCR), Section 21110. The proposed project would include waste relocation, borrow soil excavation and placement as cover soil,

engineered fill placement and compaction, and installation of stormwater management features.

### **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 22, Hazards and Hazardous Materials, 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 LEA for Imperial County and responsible for providing regulatory oversight of solid waste handling and disposal activities, including inspections. Please contact the LEA Manager, Jorge Perez, at (442) 265-1888 or [jorgeperez@co.imperial.ca.us](mailto:jorgeperez@co.imperial.ca.us) to discuss the regulatory 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 in preparing the environmental document and 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

IS and MND for Hot Spa Solid Waste Site (13-AA-0010)

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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 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) 324-0393 or by e-mail at [gina.weber@calrecycle.ca.gov](mailto:gina.weber@calrecycle.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Gina Weber".

Gina Weber, Environmental Scientist  
Permitting & Assistance Branch – South Unit  
Waste Permitting, Compliance & Mitigation Division  
CalRecycle

cc: Benjamin Escotto, CalRecycle  
Jorge Perez, Imperial County Environmental Health Services, LEA