

May 28, 2021

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Governor's Office of Planning & Research

May 28 2021

STATE CLEARINGHOUSE

Subject: SCH No. 2021050146 –Initial Study/Mitigated Negative Declaration Mammoth Disposal Transfer Station Expansion – Mono County SWIS No. 26-AA-0013

Dear Ms. Cooke:

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 Town of Mammoth Lakes, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (Draft IS/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 proposed Mammoth Disposal Transfer Station Expansion Project (project) is located within the Town of Mammoth Lakes (Town), in the southwestern portion of Mono County. The project site comprises two separate sites at 59 Commerce Drive (1.87 acres; Assessor's Parcel Numbers [APN] 037-200-049 and 037-200-050) and 264 Commerce Drive (0.55 acres; APN 037-200-061). Regional access is provided to the project site via State Route 203 (SR-203), approximately 0.1-mile to the north, and U.S. Route 395, approximately 1.6 miles to the east.

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site.

The proposed project would allow for:

- Construction of a 9,600-square foot transfer station building;
- Replacement of the guard/attendant shed with a pre-manufactured approximately 200-square foot scale house;
- Installation of truck scales near the proposed scale house;
- Installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house;
- Construction of a new approximately 1,855-square foot office building (and demolition of the existing 1,200-square foot office building);
- Repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site;
- Abandonment of existing underground stormwater management infrastructure and construction of new underground stormwater retention facilities;
- Connection of a new fire sprinkler and liquid propane gas laterals;
- New pavement for site circulation and parking areas and,
- Construction of a 10-foot masonry perimeter wall located at the east, south and west sides of the property.

The expanded transfer station facility would be open from 6:30 a.m. to 9:00 p.m. seven days a week with approximately 25 employees. In total, the project would result in three net new employees, two additional employees staffed at the transfer station and one additional employee staffed at the buy-back/recycling center.

The transfer station would receive only municipal solid waste, construction and demolition debris, and wood waste and green waste debris. The expanded transfer station facility is anticipated to receive an average of 78 tons per day with a peak throughput of 301 tons per day. Under the SWFP, the facility would be permitted to receive up to 500 tons per day. The facility is designed to handle a throughput of up to 543 tons per day and has a storage capacity (floor space) of 144 tons.

Additionally, while the transfer station facility is anticipated to receive an average of 182 vehicle trips per day with a peak of 284 trips per day, it is designed and permitted to process a peak of 400 trips per day.

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 of the Draft IS/ND, in addition to the specific location noted.

Comments for the Draft IS/MND are summarized in the table below:

Chapter/Section	Page and Location	Comment
Title 14 CCR Section 17410.1 Solid Waste Removal	2-10	The regulatory timeframe to remove waste for disposal is 48 hours, not the stated 72 hours removal frequency.

Solid Waste Regulatory Oversight

A new Full Solid Waste Facilities Permit will be required before operations within the above specified parameters can commence. The Mono County Department of Environmental Health is the Local Enforcement Agency (LEA) and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Jill Kearney at (760) 924-1846 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 environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the ND 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 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) 341-6405 or by e-mail at Christine.Karl@calrecycle.ca.gov.

Sincerely,

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Mammoth Disposal Transfer Station Expansion
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Christine Karl, Environmental Scientist
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CalRecycle

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