



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for Environmental Protection
Rachel Machi Wagoner
CalRecycle Director

January 13, 2022

Ms. Laura Traffenstedt, Assistant Planner
City of La Mesa
Community Development Department
8130 Allison Avenue
La Mesa, CA 91942



Subject: SCH No. 2022010065 – Draft Initial Study and Negative Declaration for the City of La Mesa EDCO Expansion Project – San Diego County

Dear Ms. Traffenstedt:

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 City of La Mesa Community Development Department, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Initial Study/Negative Declaration (Draft IS/ND) 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 City of La Mesa EDCO Expansion Project is located at 8184 Commercial Street within the City of La Mesa. The primary entrance for the site is from the south on Commercial St. The project site is approximately 4.1 acres, and the site currently has a General Plan designation of City Public Use and a zoning designation of Industrial Service and Manufacturing/Urban Design Overlay. The site is surrounded by designations that include Regional Serving Commercial to the north, Commercial Light Industrial to the east and south, and City Public Works Facility to the west. Surrounding zoning designations are Light Industrial and Commercial Service/Floodway Overlay/Urban Design Overlay to the north and Industrial Services and Manufacturing/Urban Design Overlay to the east, south, and west.

The proposed project would increase the maximum permitted daily tonnage from 1,000 tons/day to 2,000 tons/day.

An additional 308 self-haul vehicles per day, an additional 111 collection vehicles and an additional 46 transfer vehicles are expected as a result of the project expansion.

An exit scale and scale house are proposed to be added also.

Current project operations consist of days and hours of operation listed below:

- Refuse Receiving - Haulers, 6:00 a.m. – 6:00 p.m. Sunday-Saturday
- Refuse Receiving - Public, 5:00 a.m. – 1:00 p.m. Monday-Saturday
- Refuse Receiving - Public, 8:00 a.m. – 4:30 p.m. Sunday
- Internal Refuse Processing, up to 24 hours Sunday-Saturday
- Refuse Transfer, up to 24 hours Sunday-Saturday
- Buy-Back Center, 10:00 a.m. – 4:00 p.m. Tuesday-Friday
- Buy-Back Center, 8:00 a.m. – 4:00 p.m. Saturday
- Internal Maintenance, up to 24 hours Sunday-Saturday

No changes in days or hours are being proposed.

The 1997 Environmental Impact Report (EIR) allowed for a 4,224 tons/day load out capacity. No change to load out capacity is proposed.

Comments

Load Out Capacity

The IS/ND states, “Because design elements approved in the 1997-certified EIR allow for up to 4,224 tpd of load out capacity, no physical changes to the main building are necessary to accommodate the requested increase to a maximum of 2,000 tpd.”

Can you specify where in the EIR this load out capacity is stated?

Refuse Receiving Hours

The IS/ND states, “Similarly, the proposed Station expansion would not affect hours of operation. The facility would remain open seven days per week, with deliveries accepted during hours ranging from 5:00 a.m. to 6:00 p.m., however as needed, deliveries may be accepted outside of these hours.”

Please clarify. Is the intention of this statement to mean that refuse receiving can be accepted outside of these hours and theoretically be 24 hours/seven days a week if it is deemed “as needed”?

Trip Generation

The Transportation and Impact Analysis states an additional 308 self-haul vehicles per day, an additional 111 collection vehicles and an additional 46 transfer vehicles are expected as a result of the project expansion.

The current assumed passenger car equivalent vehicle (PCEV) in the EIR is 1,214. Table 8-1 of the Transportation and Impact Analysis assumes an additional 1,479 PCEV.

Is the total assumed PCEV 2,693 with the project expansion? Can the facility adequately accommodate this to comply with Title 14, California Code of Regulations, Section 17418.3?

Solid Waste Regulatory Oversight

The County of San Diego Department of Environmental Health is the Local Enforcement Agency (LEA) for the County of San Diego and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Ricardo Serrano at (858) 495-5810 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 Final 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 916.341.6719 or by e-mail at Cody.Oquendo@calrecycle.ca.gov.

Sincerely,



Cody Oquendo, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Benjamin Escotto, Supervisor
Permitting & Assistance Branch –South Unit

Ricardo Serrano, County of San Diego LEA