



Department of
Resources Recycling and Recovery

Yana Garcia
Secretary for Environmental Protection
Rachel Machi Wagoner
CalRecycle Director

December 14, 2023

Andrea Montaña, Associate Planner
City of El Centro Community Development Department
Planning & Zoning Division
1275 W. Main Street
El Centro, CA 92243



Subject: SCH No. 2023110582 – Draft Mitigated Negative Declaration (MND) No. 22-03 – General Plan Amendment 22-03 & CR&R Waste Transfer Facility – Imperial County

Dear Ms. Montaña:

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 El Centro Community Development Department, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft 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 General Plan Amendment 22-03 & CR&R Waste Transfer Facility (proposed project) is located approximately 1,125 linear feet east of the southeast corner of Dogwood Avenue and Ross Avenue, with a legal description of lots 15 through 22 and lots 39 through 40, El Centro Homes Acres, in the City of El Centro, within Imperial County. The project site is approximately 8.95 acres, and the site is currently zoned for General Manufacturing (MG). The site is surrounded by agricultural land to the east, a contractor storage yard to the west, vacant land to the south, and vacant land, Ross Avenue, and a telecommunications tower to the north.

The proposed project would include construction of a solid waste transfer station, with a 66,575 square foot transfer station building, as well as onsite improvements consisting of parking areas, stormwater detention basins, compressed natural gas (CNG) vehicle fuel dispensers, and vehicle scales, on 7 acres (the remaining 1.95 acres that front Ross Avenue will remain vacant). The proposed project's operations include the transferring of waste from collection vehicles, sorting, transferring into freight trucks, and

sending material to an outside landfill. The proposed facility is estimated to generate a total of 151 vehicle 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 MND, in addition to the specific location noted. Comments on the Draft MND are summarized below:

Page 2, Environmental Checklist/Initial Study, 8. Description of Project – The description given for the proposed project is missing a number of parameters needed for CalRecycle's concurrence on the Solid Waste Facility Permit (SWFP). These parameters include (1) maximum daily tonnage (tons per day), (2) types of waste to be received, (3) days and hours of operation and maintenance, and (4) the design capacity of the site (maximum tons per day that could be handled). These parameters should be described and factored in the environmental analysis and determination. Here is a link to an outline document on CalRecycle's website providing more detail on the correlation between CEQA and SWFPs: <https://www2.calrecycle.ca.gov/Docs/Web/123045>.

Page 13, III. Air Quality, Explanation, (e) – States that the activities at the site include sorting. Please provide a more detailed description of how material would be processed at the site.

Page 27, XVII. Transportation, Explanation, (a) – States that the transfer station is estimated to generate a total of 151 daily trips. Is this an estimate of the maximum number of vehicle trips expected at the transfer station or the average number of vehicle trips? If this estimate is of the average number of vehicle trips, please provide the estimated maximum number of vehicle trips expected at the transfer station. Is this information in the October 23, 2023 CR&R Transfer Station – Transportation Assessment?

A copy of the Mitigation Monitoring and Reporting Program (MMRP) should be attached to the Final MND.

Solid Waste Regulatory Oversight

The Imperial County Public Health Department, Environmental Health Division is the Local Enforcement Agency (LEA) for Imperial County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact the LEA, Alphonso Andrade, at 442.265.1888 or by email at alphonsoandrade@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 environmental document and hopes that this comment letter will be useful to the

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Lead Agency preparing the Final MND, and in carrying out their responsibilities in the CEQA process.

CalRecycle staff request 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 request 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.

Sincerely,



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

cc: Benjamin Escotto, CalRecycle
Alphonso Andrade, LEA
Jorge Perez, LEA