



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

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Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

March 3, 2026

Jim Minnick  
Planning & Development Services Director  
Imperial County  
801 Main Street  
El Centro, CA 92243  
[jimminnick@co.imperial.ca.us](mailto:jimminnick@co.imperial.ca.us)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE IMPERIAL COUNTY  
LITHIUM VALLEY SPECIFIC PLAN DATED DECEMBER 30, 2025 STATE  
CLEARINGHOUSE NUMBER [2023120104](#)

Dear Jim Minnick,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Imperial County Lithium Valley Specific Plan (LVSP) (Project). The site spans approximately 51,622 acres and addresses implementation of the Project that plans for the transformation of primarily undeveloped land. This region requires extensive development in terms of infrastructure, roadways, and utilities to achieve the vision for this part of Imperial County. The Project would include implementation of LVSP land use regulations, design guidelines, transportation networks, and infrastructure tailored to support the unique community-based needs of the Lithium Valley region. The Project also includes amendments to the County General Plan and Zoning Ordinance /Map. DTSC recommends and requests consideration of the following comments:

1. There are several areas of which DTSC has regulatory oversight over that are within the proposed Project site, whether they are listed as having documented

contamination, land use restrictions, are subject to a Hazardous Waste Facility Permit, or the potential for the Project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Therefore, DTSC recommends further coordination with the Department in the event that the proposed project may impact any of the areas that may fall under DTSC's oversight. Please review the project area and coordinate with the Department if any suspected decisions may impact these areas of which DTSC oversees.

2. There are two Land Use Covenants (LUCs) recorded in [2012](#) and [2017](#), respectively. The [2017 LUC](#) was accompanied by a DTSC-approved [Soil Management Plan \(SMP\) in 2016](#). While the 2012 LUC does not have SMP, it indicated there are remaining contamination in soil at all five sites, and it requires “Any contaminated soils and/or Geocrete brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law. Geocrete is a concrete stabilized filter cake material containing arsenic made into blocks”. Therefore, if the proposed activities under this Project involve earth disturbance, a SMP should be prepared for compliance with the 2012 LUC, and DTSC requests the corresponding oversight agency of the Project take necessary actions to ensure compliance with the LUC provisions and SMPs.
3. Based on current geothermal power operations and multiple evaluations of specific lithium extraction proposals, DTSC expects that there are likely to be significant changes in the generation of solid waste and hazardous waste within the project area as a result of operations of the proposed Project. The prepared documents don't appear to quantify the extent of those changes, nor do they address how these wastes will be actively managed by the generators, transporters, or local treatment and disposal facilities during the operational phases of the Project. Further discussion should be provided to clarify what considerations were applied regarding waste management during the operational phases of the Project.

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DTSC would like to thank you for the opportunity to comment on the DEIR for the Imperial County Lithium Valley Specific Plan and reserves the right to provide additional and applicable comments on future CEQA documents. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

Sincerely,

A handwritten signature in black ink that reads "Dave Kereazis". The signature is written in a cursive, flowing style.

Dave Kereazis  
Associate Environmental Planner  
HWMP-Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

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cc: (via

Governor's Office of Land Use and Climate Innovation  
State Clearinghouse  
[state.clearinghouse@lci.ca.gov](mailto:state.clearinghouse@lci.ca.gov)

Matt Valerio  
Senior Project Manager  
Dudek / Consulting Firm  
[mvalerio@dudek.com](mailto:mvalerio@dudek.com)

Scarlett Zhai  
Supervising Hazardous Substance Engineer I  
SMRP – Cleanup - Cypress  
Department of Toxic Substances Control  
[Scarlett.Zhai@dtsc.ca.gov](mailto:Scarlett.Zhai@dtsc.ca.gov)

Julia Ye  
Environmental Scientist  
SMRP – Cleanup - Cypress  
Department of Toxic Substances Control  
[Julia.Ye@dtsc.ca.gov](mailto:Julia.Ye@dtsc.ca.gov)

Taylor Grose  
Senior Hazardous Substance Engineer  
HWMP – Permitting - Sacramento  
Department of Toxic Substances Control  
[Taylor.Grose@dtsc.ca.gov](mailto:Taylor.Grose@dtsc.ca.gov)

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

Scott Wiley  
Analyst II  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)