



Department of
Resources Recycling and Recovery

Jared Blumenfeld
Secretary for Environmental Protection
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March 7, 2022

Mr. Chris Celsi
City of Santa Monica
Public Works Development Department
Resource Recovery & Recycling Division
2500 Michigan Ave.
Santa Monica, CA 90404



Subject: SCH No. 2017111053 – Addendum to the City of Santa Monica City Yards Master Plan Environmental Impact Report for City of Santa Monica Transfer Facility, Facility Number 19-AA-0008 – Los Angeles County

Dear Mr. Celsi:

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 Santa Monica Public Works Department, acting as Lead Agency, has prepared and circulated a Draft Addendum to the City Yards Master Plan Environmental Impact Report (EIR) 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 Yards Master Plan February 2022 Addendum (proposed project) is located at 2500 Michigan Avenue in the Pico neighborhood area of the City of Santa Monica. The City Yards Site is generally located in the eastern portion of the City near the Bergamot Plan area. The City Yards site is generally bounded by Michigan Avenue and 26th Street Arts Center to the north, Stewart Street and Gandara Park to the east, Interstate (I) 10 to the south, a mobile home park to the southeast, and 24th Street to the west.

The project site is approximately 14.7 acres, and the site is currently zoned for Industrial Conservation (IC). The site is surrounded by Industrial Conservation, Conservation: Art Center, Open Space, Residential Mobile Home Park, and Bergamot Transit Village zoning. To the east of the project site is Stewart Street and Gandara Park, a neighborhood park. Across Stewart Street are residential homes and Ishihara Park. To the south is a mobile home park, part of the Pico neighborhood. To the west,

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designated industrial zoning extends to Cloverfield Boulevard. To the north, across Michigan Avenue, is Bergamot Station. To the south is Southern California Disposal (SCD) and Dewey Pest Control. The Santa Monica Municipal Airport is located approximately 1.5 miles to the south.

The proposed project is a change in location of the City's tip and transfer facility, which would be relocated at City Yard, south of the Fire Department Training area, to the Hanson and SCD lots. Additional proposed changes would be: sound wall on the Hanson lot to extend from the existing eastern wall along the SCD lot; and relocation of the fire lane that currently bisects the Hanson lot to a location north of the Hanson lot that connects to the fire access gate at the mobile home park.

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 Addendum, in addition to the specific location noted.

Comments for the Draft Addendum are summarized below:

Page 8 - Section 2.2 - Environmental Setting - Existing Land Uses

The third bullet point states, "The Resources Recovery and Recycling Division offers collection services to residential and commercial for waste, recyclable materials, and landfill trash. It also performs residential and arterial street sweeping." Is that statement referring to City of Santa Monica Transfer Facility, SWIS Number 19-AA-0008? The rest of the bullet point refers to Southern Cal. Disposal Co. R. & T.S. (SCD), SWIS Number 19-AA-0846, and mentions specific wastes accepted and permitted tons per day for that facility. Will the relocation of the processing and transfer facility (i.e., City of Santa Monica Transfer Facility, SWIS No. 19-AA-0008) be impacted in regards to their current solid waste facility permit parameters? Parameters include:

- Address
- Operator and property owner
- Receipt of waste types
- Hours of operation
- Tonnage
- Traffic/Vehicles per day
- Acreage

Page 9 - Section 2.3.1 - Proposed Relocation of the Processing and Transfer Facility

It is stated that, "The City's processing and transfer facility, which was located in the southern portion of the City Yards Site, would be relocated to the Hanson and SCD lots. The Hanson lot is owned by the City and the SCD lot is owned by Southern California Disposal. The two lots would be combined so that the tipping activities would occur

primarily on the SCD lot and the sorting and transfer activities would occur on the Hanson lot. The proposed processing and transfer facility would occupy an approximately 40,942-square-foot area.” The current permit cites the City of Santa Monica/City Hall as the only property owner. Will the new location be under both property owners, City of Santa Monica and SCD? The current permitted acreage for the City of Santa Monica Transfer Facility, SWIS No. 19-AA-0008, is 2.7 acre. Will the new location acreage be 40,942 square feet (0.94 acres)?

It is also stated, “The addition of the Hanson lot would allow enough space to sort the materials into different piles, primarily dirt, concrete, construction and demolition material, large recyclable items such as mattresses and scrap metal as well as store equipment and provide a staging area for trucks that may be waiting for the SCD transfer area to clear or trucks depositing materials.” The current permitted waste streams accepted at City of Santa Monica Transfer Facility, SWIS No. 19-AA-0008, is non-hazardous solid waste, curbside single-stream recyclables delivered by City collection vehicles. The facility may also receive select loads of commercial municipal solid waste (MSW) (with greater than 50% recyclable content) and MSW from City collection vehicles. Will the facility at the new location be receiving the same streams of material as currently permitted, with the addition of construction and demolition (C&D) debris and large recyclable items?

Page 117 - Figure 3 - Existing Conditions

Figure 3 has site notes listed in numerical order with explanations. The figure/map is missing site note 14 - sound barrier and site note 15 - bollards is labeled twice.

Solid Waste Regulatory Oversight

The Los Angeles County Department of Public Health is the Local Enforcement Agency (LEA) and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact Dorcas Hanson-Lugo of the LEA at 626.430.5540 or dlugo@ph.lacounty.gov 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 Addendum 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 916.323.1799 or by e-mail at nai.teurn@calrecycle.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nai Teurn', with a long horizontal stroke extending to the right.

Nai Teurn, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

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

Dorcas Hanson-Lugo, Chief
Los Angeles County Department of Public Health, LEA