



Department of
Resources Recycling and Recovery

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August 6, 2019

Jose Gutierrez, Environmental Supervisor 2
City of Los Angeles, Local Enforcement Agency
Los Angeles Department of Building and Safety
Environmental Affairs Division
221 N. Figueroa Street, Room 1250
Los Angeles, CA 90012

Subject: SCH No. 2019079096 –Draft Initial Study/Mitigated Negative Declaration for Direct Disposal, SWIS No. 19-AR-1228 – City of Los Angeles

Dear Mr. Gutierrez:

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 Los Angeles Local Enforcement Agency, Los Angeles Department of Building and Safety, Environmental Affairs Division, 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 name of proposed project is Draft Initial Study/Mitigated Negative Declaration-Direct Disposal Large Volume Solid Waste Transfer/Processing Facility. The proposed project is located at 3720 Noakes Street, Los Angeles, CA 90023. The proposed project is situated east of Calzona Street, west of Los Palos Street and south of Union Pacific Avenue. The project site is approximately 1.2 acres and is currently zoned for heavy industrial. All immediately adjacent properties are also zoned for heavy industrial. A mill, a garment manufacturing facility, and a warehouse occupy the north side of the proposed project. A printing facility occupies property to the east, a wholesale distribution warehouse occupies property to the west, and a vacant strip of land owned by Union Pacific Railway is located to the south.

Direct Disposal is currently a Medium Volume Construction and Demolition/Inert Debris Processing Facility that operates 24 hours per day, seven days per week and can process and transfer up to 175 tons per day (TPD). The site consists of a building that houses processing equipment (screens and a sort line), a repair shop, truck scales, a scale house and outdoor storage areas. The site is fully

enclosed by an 8-foot tall perimeter fence. Off-site parking is provided at 3719 Noakes Street (storage of roll-off containers also occurs here).

The proposed project would allow for Direct Disposal to increase the processing and transferring of solid waste material to 500 TPD. The facility would still operate 24 hours per day, seven days per week. Proposed improvements to increase operational efficiency include: opening new access doors on the east and west side of the building to improve vehicle circulation, material processing and material transfer, adding a low speed shredder, adding screens, increasing bunker capacities and extending the sort line. Future improvements may include a vehicle queuing lane, a truck scale, a scale-house and offices at 3719 Noakes Street.

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/MND, in addition to the specific location noted.

Comments for the Draft IS/MND and Mitigation Monitoring and Reporting Program (MMRP) are summarized in the table below:

Document	Page and Location	Comment
Initial Study	P.13 – Environmental Factors Potentially Affected	The factors that require at least one mitigation measure should be checked. Recommend to rephrase “...one impact that is a “Potentially Significant Impact” as indicated by the checklist...” to “...one impact that is “Potentially Significant Unless Mitigation is Incorporated” as indicated by the checklist...”
Initial Study	P.19, 21, 34 and 38 – Air Quality (3.3 b), Air Quality (3.3 e), Public Services (3.13 a), and Utilities and Service Systems (3.16 g)	Each of these sections has mitigation measures cited. “Potentially Significant Unless Mitigation Incorporated” should be checked for each of these sections.
MND	P.3 – Proposed Project (Section 1.6)	Recommend to clarify the description of the facility from “...Medium Volume Direct Disposal Construction, Demolition and Inert (CDI) Material Recovery Facility (MRF)...” to “...Medium Volume Construction and Demolition/Inert Debris (CDI) Processing Facility named Direct Disposal, a type of Material Recovery Facility (MRF)...”

Document	Page and Location	Comment
MND	P.3 – Proposed Project (Section 1.6)	This section states that “The proposed Large Volume SWFP will allow up to 500 TPD of solid waste to be processed and transferred at the Direct Disposal facility.” Section 3.3 (e) of the Initial Study states that the facility (in addition to CDI) will be receiving municipal solid waste (MSW), greenwaste and organic waste. Recommend to specify in the Proposed Project section the different streams of material the facility will be receiving. Figure 3-Site Plan should also show where each stream of material will be stored.
MND	P.3 – Proposed Project (Section 1.6)	The term “COD” is used to describe incoming material. What does “COD” stand for?
MND	P.5 – Site Plan (Figure 3)	Section 1.6 states that there is a repair shop. Could not locate the repair shop on the Site Plan.
MND	P.6 – Proposed Project (Section 1.6)	Title 14, Section 18221 of the California Code of Regulations (CCR) is referenced in regards to a Transfer/Processing Report (TPR). The correct regulation is Title 14, Section 18221.6.
MND	P.7 – City-Wide Community Plan Map (Figure 4)	The image on this page is blurry. Can a clearer image be used?
MND	P.9 – General Plan and Zoning (Section 1.7)	There are two bullet points in this section. The second bullet point describes the location of the facility, not the contents of the referenced Los Angeles Municipal Code. Thus the second bullet point should not be a bullet point, but simply its own paragraph.
MMRP	P.14 – Table A-2	Mitigation measure HHM6 is missing.

Document	Page and Location	Comment
MMRP	P.16 – Table A-2	The description of mitigation measure N-1 states, “The project shall comply with the City of Los Angeles Noise Ordinance...” This should be restated as “The project shall comply with the City of Los Angeles Noise Ordinance...”

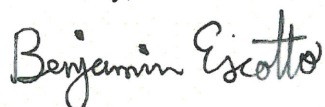
CONCLUSION

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 MND 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 to be adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is to be 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 916.341.6138 or by e-mail at benjamin.escotto@calrecycle.ca.gov.

Sincerely,



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Waste Permitting, Compliance & Mitigation Division
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AUG 06 2019

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