



August 27, 2026

Brandi Jones, Senior Planner
City of Irwindale Planning Division
5050 N. Irwindale Avenue
Irwindale, CA 91706

Subject: SCH No. 2024020415 – Draft Environmental Impact Report for Irwindale
Brew Yard Specific Plan – Los Angeles County

Dear Ms. Jones:

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 Irwindale Planning Division, acting as Lead Agency, has prepared and circulated a Draft 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 Irwindale Brew Yard Specific Plan proposes redeveloping a 150.1-acre property. The project site includes two former quarry sites totaling 70 acres. The surrounding uses directly adjacent to the Specific Plan area include the following: to the north is the I-210 freeway, existing railroad tracks, and the existing Irwindale Brew Yard brewery and training center; to the south is First Street and existing light industrial uses, generally located within the City of Azusa; to the east is the Irwindale Light Rail Station and parking, the existing Irwindale Brew Yard brewery, Irwindale Avenue, a rail easement, and light industrial/distribution uses across Irwindale Avenue; and to the west is the Santa Fe Dam Recreation Area. Prior to adoption of the Specific Plan, the Specific Plan Area was designated as Industrial/Business Park on the City of Irwindale General Plan Land Use Map.

A draft Operation Plan has been prepared for the Brew Yard Inert Debris Engineered Fill Operation (IDEFO) to backfill the two on-site quarries. The redevelopment will consist of a 3,000,000-building square foot industrial campus and 12,000 feet of additional commercial space. In addition to structures, development would consist of loading docks, truck trailer and automobile parking, vehicular and pedestrian circulation, landscaping, and associated infrastructure improvements. The project site

encompasses Assessor's Parcel Numbers (APNs): 8533-009-025, 8533-009-026, 8533-009-027, 8533-009-028, 8533-009-029, and 8533-011-052.

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 EIR, in addition to the specific location noted.

Comment 1 – Under Title 14 of the California Code of Regulations (14 CCR), Section 17388(l), an IDEFO “means an activity exceeding one year in duration in which only the following inert debris may be used: fully cured asphalt, uncontaminated concrete (including steel reinforcing rods embedded in the concrete), crushed glass, brick, ceramics, clay and clay products, which may be mixed with rock and soil. Those materials are spread on land in lifts and compacted under controlled conditions to achieve a uniform and dense mass which is capable of supporting structural loading, as necessary, or supporting other uses such as recreation, agriculture and open space in order to provide land that is appropriate for an end use consistent with approved local general and specific plans (e.g., roads, building sites, or other improvements) where an engineered fill is required to facilitate productive use(s) of the land. Filling above the surrounding grade shall only be allowed upon the approval of all governmental agencies having jurisdiction. The engineered fill shall be constructed and compacted in accordance with all applicable laws and ordinances and in accordance with specifications prepared and certified at least annually by a Civil Engineer, Certified Engineering Geologist, or similar professional licensed by the State of California and maintained in the operating record of the operation. The operator shall also certify under penalty of perjury, at least annually, that only approved inert debris has been placed as engineered fill, and specifying the amount of inert debris placed as fill. These determinations may be made by reviewing the records of an operation or by on-site inspection. Certification documents shall be maintained in the operating records of the operation and shall be made available to the EA [Enforcement Agency] during normal business hours. Acceptance of other Type A inert debris or shredded tires pursuant to Waste Discharge Requirements prior to the effective date of this Article does not preclude an activity from being deemed an inert debris engineered fill operation, provided that the operation meets all the requirements of this Article once it takes effect. Where such materials have been deposited, the operator must specify in the operation plan the type of waste previously accepted, a diagram of the fill area, and estimations of the depth of the fill material previously accepted. Inert debris placed in an Inert Debris Engineered Fill Operation is not counted as diversion or disposal for a given jurisdiction.”

Comment 2 – Under 14 CCR Section 17388.3, inert debris engineered fill operations shall submit Enforcement Agency (EA) Notifications, as set forth in CCR, Title 14, Section 18100 et seq. and shall submit a copy of its waste discharge requirements or a

letter of exemption from the applicable Regional Water Quality Control Board (RWQCB), together with its notification of intent to operate.

Comment 3 – Under 14 CCR Section 17388.3(c), each operator of an inert debris engineered fill operation shall file an “Operation Plan” (as specified in 14 CCR Section 17390) together with its notification of intent to operate.

Comment 4 – Under 14 CCR Section 17388.3(g), upon the final placement of waste at the site, the operator shall cover the site of fill with three feet of compacted soil above the fill area or with other final cover as determined by the EA. Under 14 CCR 17388.3(f), following completion or upon cessation of fill activities for more than one year and upon any transfer of any part of the land subject to the operation prior to completion of fill activities, shall comply with the requirements in Title 27 of the California Code of Regulations (27 CCR) Section 21170(a)(1), (2), and, if applicable, (3).

Comment 5 – The regulations cited above can be viewed at [Browse > California Code of Regulations - California Code of Regulations](#).

Solid Waste Regulatory Oversight

The Los Angeles County Department of Public Health, Solid Waste Management Program, is the local enforcement agency (LEA) for Los Angeles County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact Felicia Truong of the LEA at (626) 430-5540 or ftuong@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 EIR 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 916.341.6634 or by e-mail at Lor.Xiong@calrecycle.ca.gov.

EIR for Irwindale Brew Yard Specific Plan

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Sincerely,

Lor Xiong

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CalRecycle

cc: Benjamin Escotto, Supervisor
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