September 30, 2025

Mina Morgan, Associate Planner
City of Victorville Planning Department
14343 Civic Dr.
Victorville, CA 92393

Subject: SCH No. 2025091138 – Victor Valley Construction, Demolition, & Inerts Processing Facility, San Bernardino County

Dear Ms. Morgan:

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 Victorville Planning Department, 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 proposed Victor Valley Construction, Demolition, & Inerts Processing Facility (proposed project) is located on Abbey Lane, between Bimini Street and Stoddard Wells Road, City of Victorville, San Bernardino County, California, across the street from the Victor Valley Material Recovery Facility & Transfer Station (Solid Waste Information System number 36-AA-0346). The Assessor Parcel Numbers include 0472-181-16, 0472-181-23, 0472-181-65, and 0472-181-15. The Project Site is part of the Desert Gateway Specific Plan and zoned Light Industrial.

As proposed, material sorting would occur within an industrial building (see comment below on building size discrepancy). The proposed project also includes a 2,700 square foot office building, a 2,000 square foot maintenance shop, a scale house with two scales, and 34 parking spaces. The facility will be designed to recover recyclable materials such as cardboard, metals, drywall, plastics, and inerts from loads of construction and demolition waste. Trucks with loads of construction and demolition waste would enter the industrial building through two roll-up doors on the west side and dump their loads onto the concrete tipping pad.

The project proposes to receive and process 500 tons per day of incoming construction, demolition and inert (CDI) material on 6.09 acres, which would otherwise go to the Victorville Landfill. The proposed project is estimated to generate a total of approximately 158 net daily vehicle trips. Proposed hours of operations are Monday - Saturday 5:00 a.m. – 7:00 p.m. for material receipt, Monday - Saturday 24 Hours for material processing, Monday - Friday 8:00 a.m.- 5:00 p.m. for the administrative office, and Monday - Sunday 24 Hours for maintenance.

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 are summarized below:

IS, Section 8. Description of Project and Existing Setting, Pages 1-2

It is stated in the section "Project Overview" that the processing building will be 40,500 square feet. However, in the section "Proposed Operations" it is stated that the processing building will be 52,500 square feet. Please address this discrepancy.

IS, Section XIX. Utilities and Service Systems, Discussion d-e., Page 79

The paragraph states that the proposed project anticipates an average recovery rate of 65 percent. At 500 tons per day, recovered residual waste would be approximately 175 tons per day. Recovered recyclable materials would average 325 tons per day.

Since the residual rate is above 10%, the proposed project would not meet the requirements of a CDI Recycling Center, per Title 14 California Code of Regulations (14 CCR) section 17381.1(b). CDI Recycling Centers are not subject to CDI regulatory requirements. The proposed project could be subject to the CDI regulatory requirements as a Large Volume CDI Debris Processing Facility, per 14 CCR 17381(q), which will require a full Solid Waste Facilities Permit (SWFP), per 14 CCR 17383.6.

Solid Waste Regulatory Oversight

The San Bernardino County Department of Public Health, Division of Environmental Health Services, is the Local Enforcement Agency (LEA) for San Bernardino County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. Please contact Noah Westbury of the LEA at 800.442.2283 or Noah.Westbury@dph.sbcounty.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 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 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 Megan Emslander at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,

Benjamin Escotto

Benjamin Escotto, Senior Environmental Scientist, Supervisor
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CalRecycle

cc: Megan Emslander, Permitting & Assistance Branch
CalRecycle

Noah Westbury, Supervisor
LEA