



February 17, 2026

David Thompson
Los Angeles Department of Building and Safety
221 N. Figueroa Street, Suite 1250
Los Angeles, CA 90012

Subject: SCH No. 2026010720 –Draft Initial Study/Mitigated Negative Declaration for California Waste Service – Downtown Los Angeles – City of Los Angeles

Dear Mr. Thompson:

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 Los Angeles Department of Building and Safety, acting as Lead Agency, has prepared and circulated a Draft Initial Study/Mitigated Negative Declaration (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 Increase in Processing and Transfer of Construction, Demolition and Inert Materials, California Waste Services - Downtown Los Angeles (proposed project) is located at California Waste Services – Downtown Los Angeles (a large volume transfer/processing facility, identified by CalRecycle as Solid Waste Information System (SWIS) No. 19-AR-1228) at 3720 Noakes Street in Los Angeles, California. Major roads providing access to the facility include Noakes Street, Calzona Street, Los Palos Street, Esperanza Street, and East Olympic Boulevard. The project site is surrounded on the north, east and west sides by heavy industrial facilities. A mill, garment manufacturing facility and warehouse are located to the north of the site. A printing facility is located to the east of the site. A wholesale distribution facility is located to the west of the site. The Union Pacific rail line and switching yard is found to the south.

The proposed project would increase acreage from 1.24 acres to 2.19 acres, increase throughput from 500 tons per day to a maximum of 900 tons per day, and increase proposed total vehicles from 202 vehicles per day to 254 vehicles per day. In order to assist with the proposed increase in CDI, a wood grinding system consisting of an electric Rotochopper grinder and associated conveyors capable of processing 30 to 40 tons of recycled wood per hour would be installed within the plant. An additional project

feature is a storm water vault that would be constructed in the eastern portion of the property. Once constructed, storm water will be diverted to the vault which will be designed with a base mat and dry wells for filtration/infiltration to minimize off-site storm water discharges.

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.

Draft IS/MND, Section 3- Detailed Project Description, Page 9

An increase in tonnage and acreage are considered significant changes, as defined in Title 27 California Code of Regulation (27 CCR), section 21563(d)(6) and will require a Solid Waste Facility Permit (SWFP) revision, pursuant to 27 CCR 21665(e).

Draft IS/MND, Section 3 – Detailed Project Description, Page 9

It is stated that the revised permitted tons per operating day will be 900 tons per day. In the SWFP, condition 17g, it states that of the 500 tons per day, up to 100 tons can be solid waste, and the remaining tonnage will consist of construction, demolition and inert. Will the tonnage limit of solid waste increase for the 900 tons? If so, what will it be?

Solid Waste Regulatory Oversight

The Los Angeles Department of Building and Safety is the Local Enforcement Agency (LEA) for the City of Los Angeles and responsible for providing regulatory oversight of solid waste handling activities, including inspections.

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 IS/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 me at 916.341.6084 or by e-mail at theodore.tasiopoulos@calrecycle.ca.gov.

Draft IS/MND for California Waste Services – Downtown Los Angeles

February 17, 2026

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read 'Theodore Tasiopoulos', written in a cursive style.

Theodore Tasiopoulos, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

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

Eric Casper, President
California Waste Services

Stephanie Pacheco
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