



CWS DTLA MATERIALS RECOVERY FACILITY AND TRANSFER STATION

**Addendum to
The Errata of
Clarification to the
Final Initial Study/
Mitigated Negative
Declaration
APRIL 2023**

Lead Agency:

**Los Angeles Department of Building
and Safety
Local Enforcement Agency Program
221 N Figueroa Street, Suite 1250
Los Angeles, California 90012**

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**CWS-DTLA
MATERIAL RECOVERY FACILITY AND TRANSFER STATION**

ADDENDUM TO THE ERRATA OF CLARIFICATION TO THE FINAL IS/MND

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1.0 INTRODUCTION

1.1 PURPOSE OF THIS ADDENDUM

The Direct Disposal Large Volume (now known as CWS-DTLA Material Recovery Facility and Transfer Station) Solid Waste Facility Permit Errata of Clarifications to the Final Initial Study (IS)/Mitigated Negative Declaration (MND) was adopted by the Los Angeles Department of Building and Safety, Local Enforcement Agency Program (LEA) in December 2021. Since that time, California Waste Services (CWS) has purchased the facility and is proposing to; 1) modify the permitted facility boundary configuration while maintaining the existing permitted acreage of 1.24 acres (see Figure 1 for proposed modified permitted facility boundary); 2) update the processing and sorting equipment, and; 3) modify the overall layout of the facility and reconfigure the traffic flow/vehicle circulation occurring on-site to more efficiently accommodate the currently permitted throughput of 500 tons per day (TPD). The purpose of this Addendum to the Final IS/MND is to present the proposed modifications to the site and provide an update to the 2021 environmental analysis that was previously developed.

California Environmental Quality Act (CEQA) Guidelines, found in the California Code of Regulations, Title 14 (14 CCR), Section 15164 allows for either the Lead Agency or a responsible agency to prepare an addendum to a previous Mitigated Negative Declaration (MND) if “some changes or additions are necessary but none of the conditions described in 14 CCR, Section 15162 calling for preparation of a subsequent MND have occurred.”

The purpose of this Addendum is to illustrate that none of the conditions described in 14 CCR, Section 15162 would result from the improvements planned. In order to do so, the same impact categories analyzed in the Final IS/MND are reviewed and compared to the existing project in Section 2.0 of this Addendum. The findings of the Final IS/MND and any associated mitigation measures are incorporated by reference.

1.2 PROJECT OVERVIEW

This report analyzes the potential environmental effects of the proposed reconfiguration of the permitted facility boundary and the associated design and operational modifications to the CWS DTLA Material Recovery Facility.

The proposed design and operational changes include modifications to the site processing operations and sorting equipment, and overall reconfiguring of the layout of the facility. In addition to the minor modification to the permitted boundary, the following changes are proposed:

1. Create small openings in the building so more of the main sort line (approximately half) will be placed inside the building and the B line will be placed wholly inside the building. The current design has the majority of sorting equipment, including all of the B line, outside the building.
2. Upgrade the equipment along the sort line for a more efficient operation.
3. Move C&D tipping operations outside to the west of the building for safer operation and to allow the sorting equipment to be primarily housed in the building.
4. Replacement of 8-foot-high perimeter walls with 12-foot-high walls with an additional 3-foot steel riser (15 feet total height) for better security, visual screening, and noise control.
5. Addition of approximately 25 feet of mesh screening on top of the perimeter walls for additional dust control.
6. Addition of two (2) 3,200-gallon water tanks and a high-pressure water system for additional dust control.
7. Redesign of the circulation plan and relocation of scales to allow flow through of traffic from Gate 2 to Gate 1 for more efficient circulation and elimination of the need for large trucks to back into the facility from Noakes Street for safer circulation.

See Figures 1, 2 and 3 illustrating most of the above proposed changes to the facility.

Regional Location

The project site is located in an urbanized, heavy industrial setting. Occupying the north side of the CDI facility across Noakes Street is a mill, garment manufacturing facility, and a warehouse. To the east is a printing facility. The south side of the facility, bordering the City of Vernon, is a vacant strip of land owned by the Union Pacific Railway. The west side of the facility is occupied by a wholesale distribution warehouse. The front side of the property faces Noakes Street, 62 feet wide, fully developed local street, serving heavy industrial uses. The closest intersecting streets are Los Palos Street and Calzona Street, also developed for heavy industrial use.

Project Site

The project site is located at 3720 Noakes Street, Los Angeles, CA 90023 (See Figure 4). The I-5 (Santa Ana), CA-60 (Pomona), and I-710 (Long Beach) Freeways provide regional access to the project area. Whereas E. Olympic Boulevard, S. Indiana Street, E. 3rd Street, S. Downey Road, S. Eastern Avenue provide local access to the project area.

PREVIOUSLY DISCLOSED IMPACTS

The Errata of Clarification to the Final IS/MND adopted in December 2021 determined that:

- The project will not have a significant negative effect on the quality of the environment, the habitat of fish or wildlife species, or the plant or animal community.
- Section 15355 of the CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” This section further states that cumulative effects may be changes resulting from a single project or a number of separate projects and that the cumulative impacts are those which may result from “closely related, past, present and reasonably foreseeable probable future projects” (Guidelines, Section 15355[b]). The project will not result in environmental effects that are individually limited but cumulatively considerable with the implementation of proposed mitigation measures.
- The project will not result in environmental effects that will cause substantial adverse effects on human beings with the implementation of mitigation measures. The site is not located in an Environmental Justice Improvement Area as designated by the Los Angeles City Council. The site is located within an industrial area which has been zoned appropriately to encourage heavy manufacturing uses.

CEQA COMPLIANCE

Sections 15162 and 15164 of the *CEQA Guidelines* allow that an addendum to a previously certified negative declaration can be prepared for the CWS project if the criteria and conditions listed below are satisfied:

- **No Substantial Changes.** There are no substantial changes proposed in the project that will require major revisions to the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- **No Change in Circumstances.** No substantial changes to the circumstances regarding the project have taken place that will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- **No Substantial New Information.** There is no new information of substantial importance that was not known or could not have been known at the time of the previous negative declaration that shows the following:

- The project will have one or more significant effects not discussed in the previous negative declaration;
- Significant effects previously examined will be substantially more severe than shown in the previous negative declaration;
- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternatives; and
- Mitigation measures or alternatives which are substantially different from those analyzed in the previous negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Each of the above conditions is satisfied because:

1. The changes to the project evaluated in the Final IS/MND, described in Section 1.2 Project Overview, would not result in new significant environmental effects as documented in Section 2.0 of the Addendum. In addition, because there were no significant impacts identified in the Final IS/MND, there cannot possibly be a substantial increase in the severity of previously identified significant impacts.
2. There are no substantial changes to the circumstances in which the proposed project was previously analyzed that would result in additional significant impacts that were not discussed in the Final IS/MND.
3. There is no substantial new information. The changes in the proposed project do not constitute substantial new information as defined in the CEQA Guidelines. Changes to the proposed project would not result in additional significant impacts that were not discussed in the Final IS/MND. Additionally, the intent of the mitigation measures remains unchanged.

2.0 COMPARISON OF PROJECT TO PREVIOUS FINDINGS

The findings of the Errata of Clarifications to the Final IS/MND adopted in December 2021 are hereby incorporated into this Addendum by reference to provide a basis of comparison for changes from the Final IS/MND. Changes to the facility referenced in the environmental impact comparisons below are documented in Figures 1, 2 and 3.

3.0 LEAD AGENCY AND PREPARERS

3.1 LEAD AGENCY

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3.2 PREPARERS OF THIS ADDENDUM

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Contact: Virginia Becerra, Project Manager

TABLES

TABLE 1
Comparison of Environmental Impacts of CWS 2021 IS/MND and 2023 Changes in Proposed Project

Environmental Factor	IS/MND Approved December 2021	Addendum to IS/MND Impact	Changes to the Project
Aesthetics	No Impact	No Impact	No Change
Agricultural Resources	No Impact	No Impact	No Change
Air Quality	Potentially Significant Unless Mitigation Incorporated	Same or Less Impact	<p><i>b. Air Quality Standards.</i> The C&D tipping operations will be moved from inside the building to outside the west side of the building which has the potential to increase exposure to dust emissions as well as particulate emissions from mobile equipment (Note that the Mitigation Measures for Air Quality in the 2021 IS/MND only required MSW to be tipped inside the building, not C&D material). The following project components will offset these potential impacts: 1) the proposed project will now have sort lines and material processing operations primarily occurring inside the building, decreasing potential exposure to fugitive dust from this activity as well as particulate emissions from the associated mobile equipment moving recovered materials within the building; 2) the proposed reconfiguration of inbound and outbound truck circulation and scale relocation will improve overall circulation efficiency and reduce excessive truck maneuvering (e.g. backing into the facility from Noakes Street) and queuing thereby reducing particulate emissions and associated potential exposure; 3) addition of two (2) 3,200-gallon water tanks and a high-pressure water system for dust control purposes (Note that this will reduce fugitive dust emissions and potential exposure throughout the facility) and; 4) Replacement of the 8-foot-high perimeter wall with a 15-foot-high wall with approximately 25 feet of screen mesh on top of it for additional fugitive dust control. When considering the above offsetting project components, impacts from dust and particulate emissions are expected to change very little and will likely improve overall. All existing mitigation measures will continue to be implemented.</p> <p><i>e. Create objectionable odors affecting a substantial number of people.</i> Alternative Odor Management Plan implementation will continue. Tipping and transfer of any MSW received will continue to be conducted inside the building. All existing mitigation measures will continue to be implemented.</p>
Biological Resources	No Impact	No Impact	No Change
Cultural Resources	No Impact	No Impact	No Change
Geology/Soils	Less-Than-Significant Impact	Same Impact	<i>b. Effects from Seismic Activity.</i> Impacts associated with the Geology/Soils Environmental Factor were discussed in the Final

TABLE 1
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Environmental Factor	IS/MND Approved December 2021	Addendum to IS/MND Impact	Changes to the Project
			IS/MND. The design of the project complies with City of Los Angeles building codes. This potential impact will be less than significant as no new structures are proposed, and no new geology/soil impacts will occur.
Hazards and Hazardous Materials	Potentially Significant Unless Mitigation Incorporated/Less than Significant Impact	Same Impact	<p><i>a. Transport, Use, or Disposal of Hazardous Materials.</i> <i>b. Release of Hazardous Materials.</i></p> <p>Occasionally small amounts of prohibited or hazardous wastes are found in the course of normal resource recovery and recycling operations from attempted illegal disposal or abandonment of hazardous waste by the original generator. This material is separated out and handled in accordance with existing local, state, and federal regulations. The facility maintains a hazardous, liquid and special waste exclusion program which includes procedures on handling prohibited waste found at the facility. Under the proposed project these existing procedures would continue to be used along with continued implementation of the mitigation measures from the MND.</p> <p>Impacts associated with Hazards and Hazardous Materials Environmental Factor were discussed in the Final IS/MND. The redesign of the project will also follow existing procedures identified above. Therefore impacts would be less than significant.</p>
Hydrology/Water Quality	Potentially Significant Unless Mitigation Incorporated	Same or Less Impact	<p><i>a. Water Quality Standards/Waste Discharge Requirements</i> <i>f. Degradation of Water Quality</i></p> <p>A proposed stormwater vault collection system is currently being designed that will direct stormwater to one of three proposed below-grade vaults that will temporarily store the water and allow it to infiltrate laterally in all directions into a sandy layer placed around the vaults, as well as to percolate directly downward. The system will be designed to contain and infiltrate/percolate more than the design storm requirement for the California General Permit for Industrial Storm Water Discharges (25-year 85th Percentile). Prior to implementation of this system all existing mitigation measures will continue to be implemented. Subsequent to implementation, the Storm Water Pollution Prevention Plan will be modified accordingly with continued implementation of mitigation measures from the 2021 IS/MND.</p>
Land Use/Planning	No Impact	No Impact	No Change

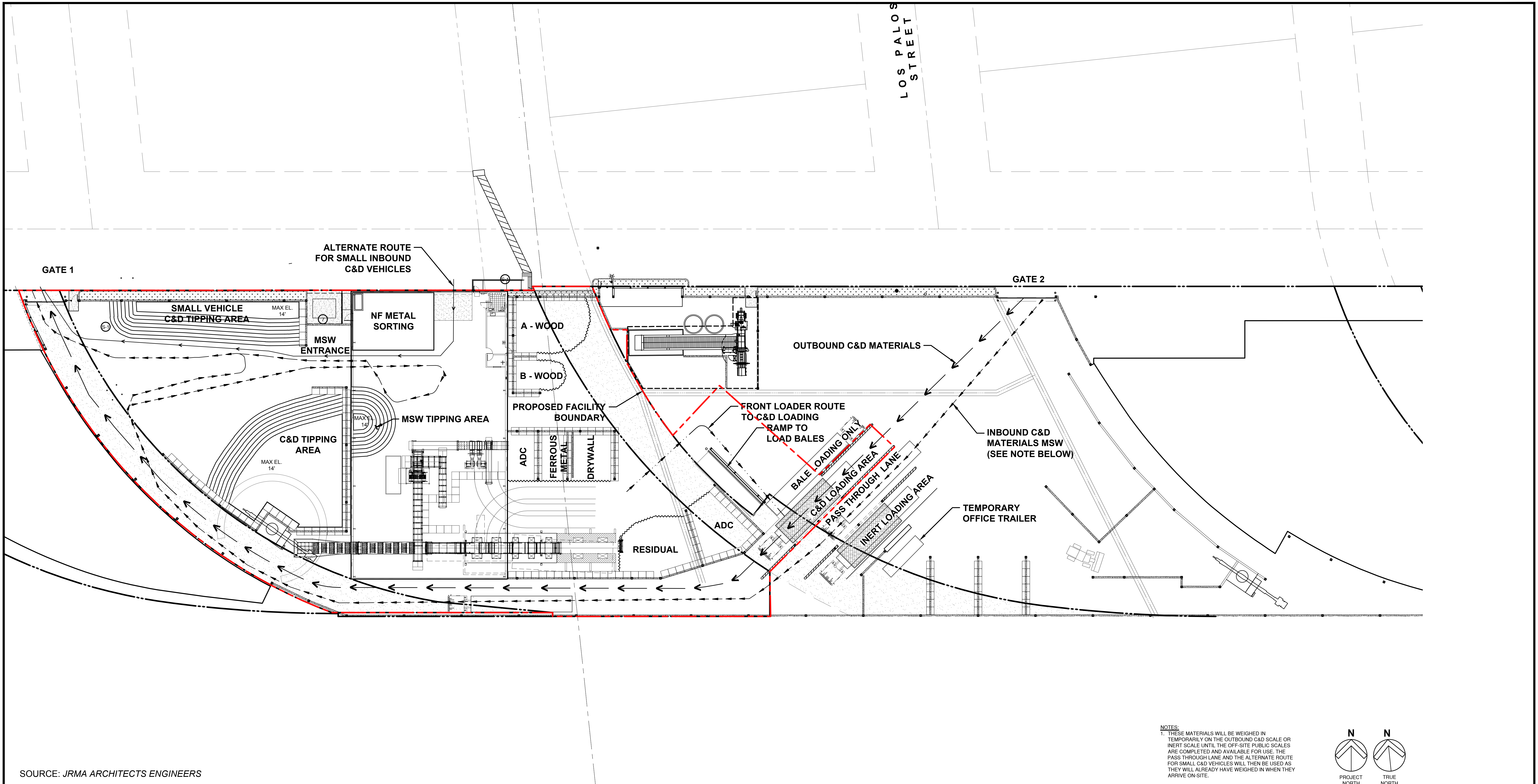
TABLE 1
Comparison of Environmental Impacts of CWS 2021 IS/MND and 2023 Changes in Proposed Project

Environmental Factor	IS/MND Approved December 2021	Addendum to IS/MND Impact	Changes to the Project
Mineral Resources	No Impact	No Impact	No Change
Noise	Potentially Significant Unless Mitigation Incorporated	Same or Less Impact	a. Noise Levels. The C&D tipping operations will be moved from inside the building to outside the west side of the building which has the potential to increase exposure to noise. The following project components will offset this potential impact: 1) the proposed project will now have sort lines and materials processing operations primarily occurring inside the building, decreasing potential exposure to noise generated by these activities; 2) the proposed reconfiguration of inbound and outbound on-site truck circulation will improve overall circulation efficiency and reduce excessive truck maneuvering (e.g. backing into the facility from Noakes Street) thereby reducing noise from this source, some of which is outside the perimeter wall; 3) Replacement of the 8-foot-high perimeter wall with a 15-foot-high wall for additional noise attenuation around the entire site. When considering the above offsetting project components, impacts from noise are expected to change very little and will likely improve overall. Existing mitigation measures will continue to be implemented.
Population/Housing	Less-Than-Significant Impact	Less-Than-Significant Impact	a. Population Growth. No Change
Public Services	Potentially Significant Unless Mitigation Incorporated/Less-Than-Significant Impact	Same Impact	a. Fire Protection. b. Police Protection. No Change
Recreation	No Impact	No Impact	No Change
Transportation/Traffic	Less-Than-Significant Impact	Same or Less Impact	a. Traffic. The proposed project involves a modernization to traffic circulation within the facility, including changes to ingress and egress points that result in a more efficient and safer traffic flow. The optimized traffic flow will prevent trucks from backing into the site from Noakes Street, reducing potential conflicts with traffic on that street. There will be no increase in permitted tonnage or traffic levels associated with the project. Therefore, no new or increased traffic level impacts would occur. b. Level of Service. See discussion under (a) above.
Utilities/Service Systems	Potentially Significant Unless Mitigation Incorporated	No Impact	g. Compliance with Federal, State, and Local Regulations. No new increase in tonnage is proposed, therefore no impacts will occur. The mitigation measure for this impact has been fully complied with.

TABLE 1
Comparison of Environmental Impacts of CWS 2021 IS/MND and 2023 Changes in Proposed Project

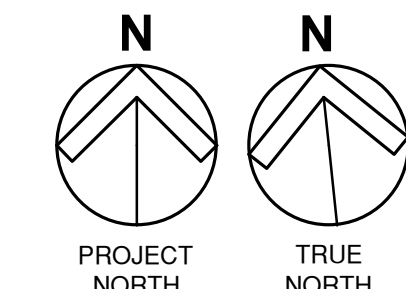
Environmental Factor	IS/MND Approved December 2021	Addendum to IS/MND Impact	Changes to the Project
Greenhouse Gas Emissions	Less than Significant Impact	Less-Than-Significant Impact	<p><i>a. Generate Greenhouse Gas Emissions, Directly or Indirectly.</i> <i>b. Conflict with any applicable plan, policy or regulation.</i></p> <p>The proposed project will optimize traffic flow/circulation on-site, resulting in less maneuvering and idling time for vehicles ultimately decreasing the generation of emissions including Carbon Dioxide, a greenhouse gas. The proposed modified project will continue to further the State of California Attorney General's recommended policy and measures to reduce GHG emissions as it assists in both waste diversion and recycling.</p>
Mandatory Findings of Significance	Less-Than-Significant Impact	Less-Than-Significant Impact	<p><i>a. Effects on the Quality of the Environment.</i> <i>b. Cumulative Effects.</i> <i>c. Environmental Effects to Humans.</i></p> <p>The proposed changes to the site do not result in any impacts regarding the findings identified in the 2021 IS/MND.</p>

FIGURES



SOURCE: JRMA ARCHITECTS ENGINEERS

NOTES:
 1. THESE MATERIALS WILL BE WEIGHED IN TEMPORARILY ON THE OUTBOUND C&D SCALE OR INERT SCALE UNTIL THE OFF-SITE PUBLIC SCALES ARE COMPLETED AND AVAILABLE FOR USE. THE PASS THROUGH LANE AND THE ALTERNATE ROUTE FOR SMALL C&D VEHICLES WILL THEN BE USED AS THEY WILL ALREADY HAVE WEIGHED IN WHEN THEY ARRIVE ON-SITE.



OVERALL SITE PLAN
 SCALE 1" = 20'-0" **1**

LEGEND	
	EXISTING BUILDING (NOT PART OF THIS PERMIT)
	EXISTING ASPHALTIC CONCRETE (AC)
	EXISTING CONCRETE
	PROPOSED CONCRETE
	EXISTING GRAVEL
	PROPOSED LANDSCAPE BY OTHERS

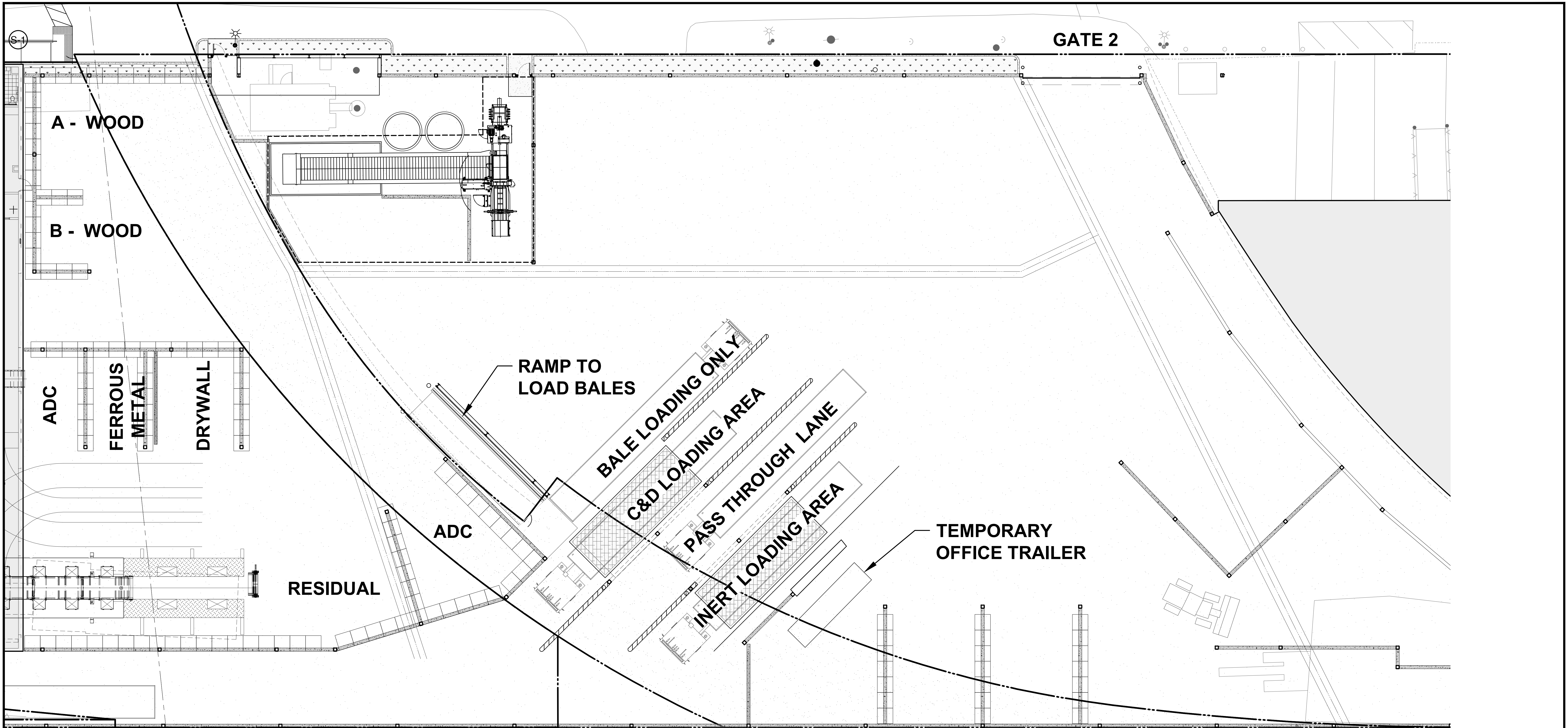
SYMBOLS	
	KEYNOTE - SEE THIS SHEET
	REVISIONS: DELTAS
	STEEL DOOR, REFER TO DOOR INFORMATION ON 5/A5.1
	EXISTING PROPERTY LINE
	EXISTING RETAINING WALL TO REMAIN
	EXISTING CHAIN LINK FENCE AND GATE
	EXISTING RAILROAD SPURS TO REMAIN
	PROPOSED FACILITY BOUNDARY (1.24 AC)
	APPROXIMATE LIMIT OF MATERIAL STORAGE
	EXISTING STORM WATER INLET
	EXISTING DRAIN INLET
	EXISTING CELL TOWER
	EXISTING MAN HOLE
	EXISTING BOLLARD
	EXISTING FIRE HYDRANT
	EXISTING POWER POLE
	EXISTING LIGHT POLE
	EXISTING LIGHT STANDARD
	EXISTING UTILITY, V.I.F.
	EXISTING UTILITY, V.I.F.
	TYPICAL
	VERIFY IN FIELD

NO.	REVISION DESCRIPTION	BY:

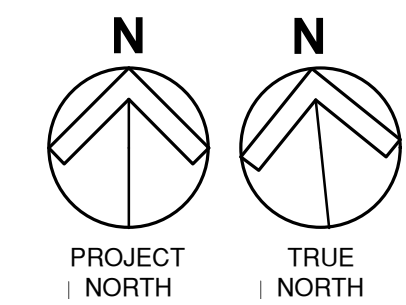
TETRA TECH
 21700 Copley Drive, Suite 200
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 TEL 909.860.7777 FAX 909.860.8017

CWS DTLA		
OVERALL SITE AND CIRCULATION PLAN		
DRAWN BY: R.C.W.	DATE: 04-2023	SCALE: AS SHOWN
CHECKED BY: P.W.	DATE: 04-2023	FIGURE 1

G:\CALIFORNIA WASTE SERVICES DTLA\CD\SH\Plan\Figure 1 Overall Site And Circulation Plan.dwg 4/19/2023 11:18 AM



SOURCE: JRMA ARCHITECTS ENGINEERS



ENLARGED SITE PLAN SCALE 1" = 10'-0" 1

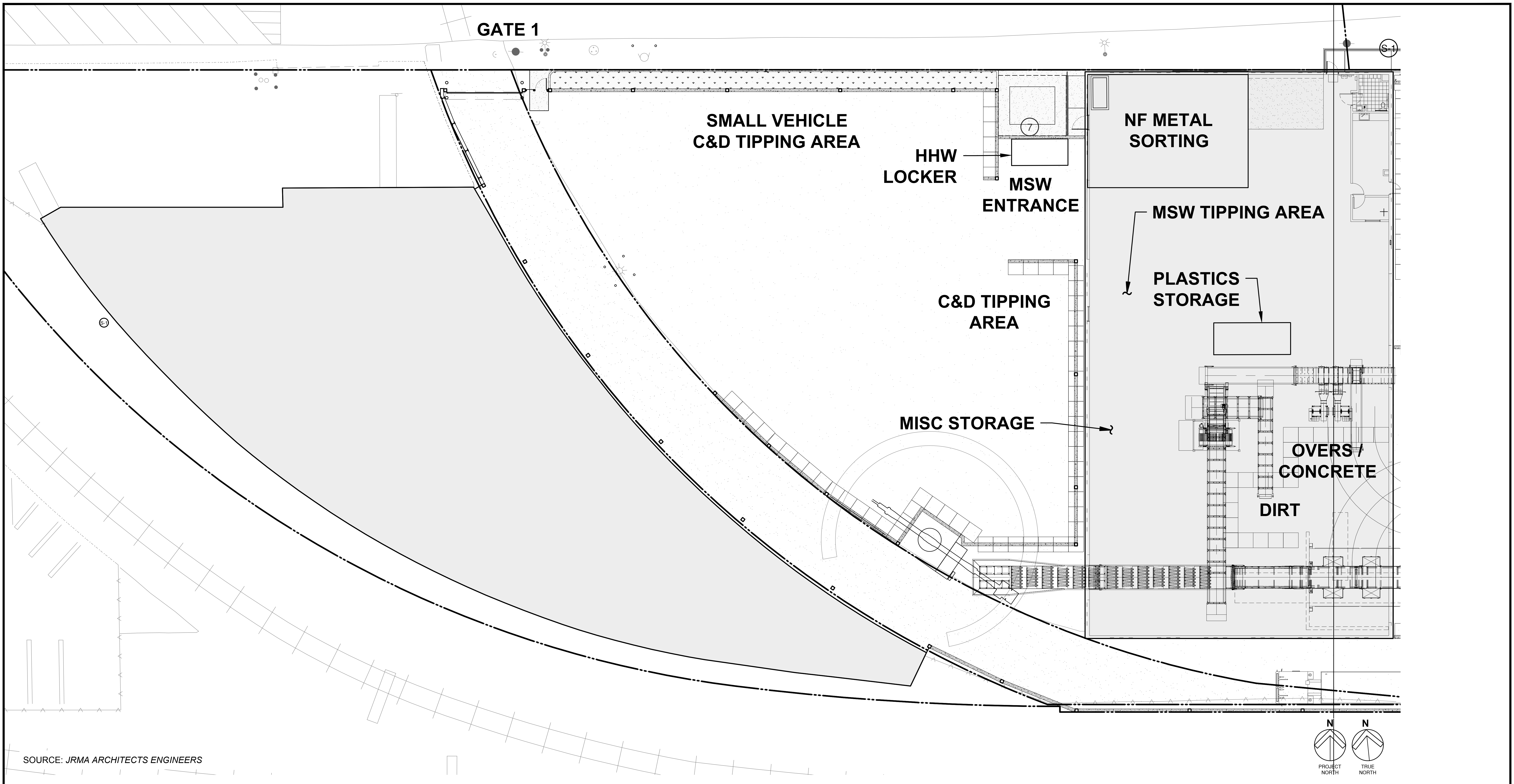
LEGEND		SYMBOLS			
	EXISTING BUILDING (NOT PART OF THIS PERMIT)		KEYNOTE - SEE THIS SHEET		EXISTING STORM WATER INLET
	EXISTING ASPHALTIC CONCRETE (AC)		KEYNOTE - SEE THIS SHEET		E.D.I. EXISTING DRAIN INLET
	EXISTING CONCRETE		REVISIONS DELTAS		E.C.T. EXISTING CELL TOWER
	PROPOSED CONCRETE		STEEL DOOR, REFER TO DOOR INFORMATION ON 5/A5.1		E.M.H. EXISTING MAN HOLE
	EXISTING GRAVEL		EXISTING PROPERTY LINE		E.B. EXISTING BOLLARD
	PROPOSED LANDSCAPE BY OTHERS		EXISTING RETAINING WALL TO REMAIN		E.F.H. EXISTING FIRE HYDRANT
			EXISTING CHAIN LINK FENCE AND GATE		E.P.P. EXISTING POWER POLE
			EXISTING RAILROAD SPURS TO REMAIN		E.L.P. EXISTING LIGHT POLE
					E.L.S. EXISTING LIGHT STANDARD
					EXISTING UTILITY, V.L.F.
					EXISTING UTILITY, V.L.F.
					TYP. TYPICAL
					V.I.F. VERIFY IN FIELD

NO.	REVISION DESCRIPTION	BY:

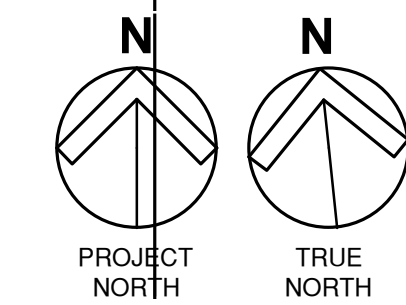
TETRA TECH
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CWS DTLA		
ENLARGED SITE PLAN A		
DRAWN BY: R.C.W.	DATE: 04-2023	SCALE: AS SHOWN
CHECKED BY: P.W.	DATE: 04-2023	FILE: Figure 2 Enlarged Site Plan A.dwg
		FIGURE 2

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SOURCE: JRMA ARCHITECTS ENGINEERS



ENLARGED SITE PLAN SCALE 1" = 10'-0" 1

LEGEND		SYMBOLS					
	EXISTING BUILDING (NOT PART OF THIS PERMIT)		KEYNOTE - SEE THIS SHEET		EXISTING STORM WATER INLET		E.L.P. EXISTING LIGHT POLE
	EXISTING ASPHALTIC CONCRETE (AC)		KEYNOTE - SEE THIS SHEET		E.D.I. EXISTING DRAIN INLET		E.L.S. EXISTING LIGHT STANDARD
	EXISTING CONCRETE		REVISIONS DELTAS		E.C.T. EXISTING CELL TOWER		EXISTING UTILITY, V.I.F.
	PROPOSED CONCRETE		STEEL DOOR, REFER TO DOOR INFORMATION ON 5/A5.1		E.M.H. EXISTING MAN HOLE		EXISTING UTILITY, V.I.F.
	EXISTING GRAVEL		EXISTING PROPERTY LINE		E.B. EXISTING BOLLARD	TYP.	TYPICAL
	PROPOSED LANDSCAPE BY OTHERS		EXISTING RETAINING WALL TO REMAIN		E.F.H. EXISTING FIRE HYDRANT	V.I.F.	VERIFY IN FIELD
			EXISTING CHAIN LINK FENCE AND GATE		E.P.P. EXISTING POWER POLE		
			EXISTING RAILROAD SPURS TO REMAIN				

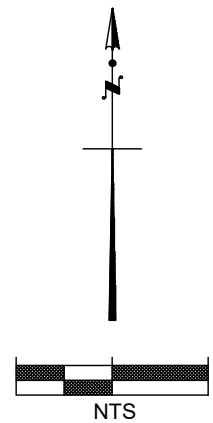
NO.	REVISION DESCRIPTION	BY:

TETRA TECH
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CWS DTLA
ENLARGED SITE PLAN B
 FILE: Figure 3 Enlarged Site Plan B.dwg
 DRAWN BY: R.C.W. DATE: 04-2023 SCALE: AS SHOWN
 CHECKED BY: P.W. DATE: 04-2023
FIGURE 3

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G:\dwg\CA WASTE SERVICES DTLA\CAD\SheetFiles\Figures\Figure 4 CWS DTLA Location Map



REFERENCE: GOOGLE EARTH, SEPTEMBER 23, 2022

TETRA TECH
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DESIGNED BY:	DATE:	03-2023
DRAWN BY:	R.C.W.	PROJ. NO.:
CHECKED BY:	V.B.	
APPROVED BY:		

CITY OF LOS ANGELES

CWS DTLA

LOCATION MAP

FIGURE 4