



Los Angeles County  
Department of Regional Planning

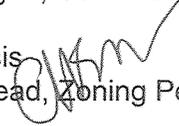
*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

May 13, 2013

TO: David W. Louie, Chair  
Esther L. Valadez, Vice Chair  
Harold V. Helsley, Commissioner  
Curt Pedersen, Commissioner  
Pat Modugno, Commissioner

FROM: Maria Masis   
Section Head, Zoning Permits East

**SUBJECT: Additional Materials for Hearing  
Project Number 92251-(4)  
Conditional Use Permit No. 92251  
RPC Meeting: May 13, 2013  
Agenda Item: 5**

Please find enclosed the following documents that were received subsequent to the hearing package submittal to the Regional Planning Commission:

- Two letters of opposition (Attachment A); and
- One letter of support (Attachment B).

If you need further information, please contact Maral Tashjian of my staff at (213) 974-6435 or [mtashjian@planning.lacounty.gov](mailto:mtashjian@planning.lacounty.gov). Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

MM:MT

# **Attachment A**

Myrna Dominguez  
668 Peckham Drive  
Whittier, CA 90601  
May 8, 2013

Attn. Regional Planning Commissioner  
Department of Regional Planning  
320 West Temple Street, Rm 1348  
Los Angeles, CA 90012

RE: Permit No. 92-251  
Puente Hills MRF, CUP Modification #8

Dear Regional Planning Commissioner:

I am writing to ask you not to approve the additional operating hours to Permit No. 92-251 PHMRF Cup Modification 8. This Unincorporated part of North Whittier has been exposed to enough environmental impact throughout the years. Adding additional traffic trucks to Workman Mill Road, Pellissier Pkwy, and nearby freeways will create more impact than stated on the EIR 1992. A supplement EIR is very necessary since new development has occurred, new growth, especially during this economy slump, and new freeway reconfiguration of the I-10 developed by adding an HOV Toll Road (that most drivers do not want to pay to use) creating traffic impact to SR-60 and I-605.

This letter reflects comments based on the FACT SHEET (document number: 2414120), since the EIR 1992 (Volumes 1-4), EIR 1995 and CUP 1999 were not readily available. I spoke to Maral Tashjian from Regional Planning and she had to dig them out and was unable to produce them available on-line. She did say she was going to direct Sanitation District 2 to supply the EIR's on a Disk. Therefore, all my concerns to the peak hour modification may not be complete due to lack of available information that the Addendum refers to as "original environment documents", "original analysis" or "original".

Fact Sheet, Item #2 section (d); states the analysis concluded incremental contribution to existing significant impacts to outside lane of SR-60 & I-605 during peak hours.

Since then, the I-10 HOV Toll Road has been opened to vehicles. In turn, it pushed more traffic to the I-605 and SR-60 as the I-10 toll road is fairly empty as drivers are not paying to ride the toll road. Therefore, traffic is dispersing to adjacent freeways.

Fact Sheet, Item #2 section (e); states mitigation was added and restricted inbound and outbound shipment and employee arrival and departure during peak hours.

Therefore, mitigation was needed per Original Traffic Analysis. I am sure there is new impact and revised old impact since the "original traffic analysis" (EIR 1992)

Regional Planning Commissioner

May 8, 2013

Page 2

in many ways other than just looking at tons per day and existing mitigation is needed if not more.

Fact Sheet, Item #3 section (b) no. ii; states that the combine tonnage of the PHLF & PHMRF will be spread into the peak traffic hours and would be less than originally analyzed during morning peak hours.

Why is the tonnage of the PHIMF not combined? Where is the New Development traffic Impact? Where is the combine traffic analysis including all three permitted facilities, PHLF, PHMRF, PHIMF?

Fact Sheet, Item #3 section (c); states cumulative impacts were analyzed for Year 2013.

Therefore, original traffic analysis projected traffic impact to the year 2013? We are living in the year of 2013. Where are todays traffic analysis or projected revised traffic analysis?

Fact Sheet, Item #3 section (c) no. i; states local streets were expected to operate at an acceptable level of service (LOS C or better) in Year 2013.

Is there a current study for Year 2013? Are local streets running at acceptable level of service (LOS C or better)? What month of year 2013 was the "original study" projected to?

Fact Sheet, Item #3 section (c) no. ii; states that SR-60 and I-605 were expected to operate at an unacceptable level of service.

If so, adding traffic impact during peak time should be further unacceptable.

Fact Sheet, Item #4 section (a); states no impacts on air quality emissions.

The PHIMF is a new development at 8000 tons per day. And with new growth and new other development in the area, significant change has occurred to the air quality of our neighborhood in 2013 vs 1992.

Fact Sheet, Item #4 section (b); states cumulative air quality impacts would be less than significant.

The EIR 1992 is over 20 years old. Those numbers are not a good source of reference for a rough estimate of environmental impact and assume there is no Significant Environment Impact today. We are living in the year of 2013 and a new EIR is needed with projected environmental change.

Furthermore, I would like to know what is the MAXIMUM tonnage capacity design of the PHMRF? And the MAXIMUM tonnage capacity design of the PHIMF? Is there room for future expansion of either facility?

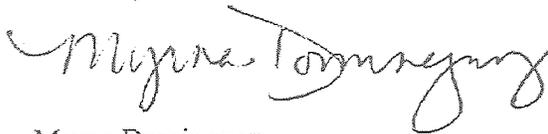
Regional Planning Commissioner  
May 8, 2013  
Page 3

Currently the PHMRF is permitted for 4,400 Tpd (expires 2029), the PHIMF is permitted for 8,000 Tpd (expires 2038?) and the PHLF is permitted for 13,200 Tpd (expires 2013), creating a total of **25,600 Tpd** plus new development and regional growth. Where is this Environmental Impact Study? The "original" analysis is over 20 years old and it seems to me that all three facilities share the same "original" analysis to create a valid analysis. How can a 20 year old EIR carry valid impacts to determine a new EIR is not needed? Modifying the hours of operations is a significant impact to our neighborhood.

At this time, I am asking that the modification request is denied until proper environmental study is conducted with projected environmental impact analysis. I am a resident of North Whittier and I love where I live, protect our quality of living in this neighborhood by asking for proper environmental impact and proper mitigation to minimized the impact of odor, noise and traffic congestion.

Thank you for your support.

Sincerely,



Myrna Dominguez  
Ph: (626) 961-1424  
E-mail: myrnad101@yahoo.com

Don C. Moss  
14051 Lomitas Avenue  
Box 90094  
City of Industry, CA 91715-0094

May 6, 2013

Regional Planning Commission  
Department of Regional Planning  
320 West Temple St, Rm. 1348  
Los Angeles, CA 90012

MAY - 8 2013

Certified Mail: 7006 2150 0001 6891 8217

Re: CUP 92251, Modification

Dear Regional Planning Commission:

The request for modification of CUP 92251 should not be approved. The peak traffic period restrictions in question are the only protections currently available for the local residential areas and the commuter and commercial traffic using the adjacent freeways and surface routes. Removal of those restrictions will cause major local and county wide disruption as a result of the substantial increase in peak period traffic congestion and air pollution which will result.

For all practical purposes, the Sanitation District is beginning a new and totally different operation at the Material Recovery Facility in question. Notwithstanding the scope of operation approved in the original CUP, the subject MRF has historically operated as a select source recycler with a low volume of tonnage which was generally clean material. Now, to the extent possible, the operation is gearing up to take the place of the Puente Hills Landfill. The new operational strategy will place raw garbage, up to the maximum permitted tonnage, into the MRF structure for the first time with all the odor and dust problems unique to a full service MRF now close to and up wind from the adjacent residential communities. The subject MRF operation is untested in this real world scenario and problems will be encountered which will affect the quality of life for the local residents.

In recent years, during public comment periods for the Intermodal Facility operations, the Sanitation District had claimed that all the truck traffic generated by the Landfill would be eliminated at the end of October, 2013, and thus subtracted from the total truck traffic accessing the freeways and surface routes in the area around the Puente Hills facilities. However, it is now evident that the ultimate combined volume of rubbish truck traffic into the MRF and IMF sites will be similar or greater to that which exists now including all of the current Landfill traffic. Therefore, the effect on the local community and the County at large will continue in relatively the same way. If the peak traffic period restrictions are removed, a substantially greater negative impact will be felt by the local

communities, the commuting public and commercial vehicles using these highway systems.

The Los Angeles Metropolitan Transit Authority has long identified the I-605 and SR-60 freeway interchange adjacent to the subject project as one of the traffic congestion "Hot Spots" in the County of Los Angeles. In recent years, those freeways have been widened to the extent possible. However, those freeway improvements have not eliminated the major traffic congestion problems which exist at that freeway interchange and the surrounding surface routes. The area continues to be a major traffic "Hot Spot" according to LA Metro. That "Hot Spot" designation refers to the freeway intersection only and does not consider the major difficulties on the surface routes of the area caused by the unique geography surrounding it. Now, on April 23, 2013, the California Environmental Protection Agency has released data which places the immediate area surrounding this project in the top 5% of ZIP Codes with the worst air pollution in the State of California.

With the analysis of all the available information regarding the current and foreseeable MRF operation along with its sister waste to rail IMF operation, the current traffic congestion on the adjacent freeways and surface routes combined with the documented high level of air pollution in the area, it is clear that the peak traffic periods operational restriction should never be lifted. Please do not approve this request for modification to the subject CUP.

Respectfully submitted,



Don C. Moss  
Avocado Heights Community Advocate

c: Supervisor Gloria Molina

# **Attachment B**

COPY

May 7, 2013

Chair David W. Louie and Commissioners  
Regional Planning Commission  
320 West Temple Street  
Los Angeles, CA 90012

Dear Mr. Louie and Commissioners:

On behalf of the Los Angeles County Disposal Association (LACDA) we wish to voice our SUPPORT for the Proposed Modification of the Conditional Use Permit for the Puente Hills Materials Recovery Facility (PHMRF).

LACDA represents solid waste recyclers, haulers, facility owners/operators and associated industry suppliers throughout L.A. County and Southern California. We are strong advocates for industry competition and work closely with most Southern California municipalities to assist with recycling and waste collection.

For many years the Puente Hills Landfill has represented the benchmark in Southern California in terms of affordable disposal rates for industry, for environmental-based operating practices, and for the development and implementation of new technologies. With the pending closure of the Landfill, we anticipate the PHMRF will continue to provide the same important services to industry. By providing these recycling and processing services at competitive rates savings are passed down to the municipalities and the residents and businesses.

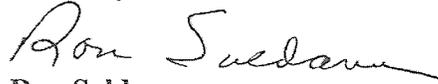
As they say time-is-money and timing is a critical element in our industry. For the PHMRF to be fully utilized by our industry, their hours of operation must compliment the need for morning and afternoon operations. The ability to operate 24-hours a day will allow early morning deliveries, while spacing out the truck trips which will result in reduced traffic congestion and the associated air quality impacts. There are other safety issues involved also, we discourage waste being left in trucks overnight.

Because of these factors we encourage your support for the proposed change in the hours that the PHMRF can accept waste and recyclables, and request that the Regional Planning Commission approve the proposed modification to the Conditional Use Permit.

MAY 10 '13 AM 9:54

DOC #

Sincerely,

A handwritten signature in black ink that reads "Ron Saldana". The signature is written in a cursive style with a large, looping initial "R".

Ron Saldana

Executive Director

**Cc: Richard J. Bruckner, Director, Department of Regional Planning**  
**Maral Tahjian, Regional Planner**  
**Mark Blackburn, President, Universal Waste Systems, LACDA**