



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

May 8, 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:

- A written request for the Commission's consideration from Ms. Marilyn Kamimura to speak for 15 minutes at the public hearing (Attachment A); and
- Additional Protest Letters (Attachment B); and
- Supplemental Information prepared by the Sanitation District which includes additional background on the project, justification for the request, and detailed responses to issues raised in protest letters (Attachment C).

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**

**Clean Air Coalition of  
North Whittier and Avocado Heights**

Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca.90601  
626-3309365

May 6,2013

Department of Regional Planning  
L.A. County  
att. Maral Tashjian fax # 213-626-0434  
320 W. Temple St. Room 1348  
Los Angeles, Ca. 90012

Re: Permit # 92-251 PHMRF Modification 8.

Dear Regional Planning Comissioners,

We are a group of people who are working so hard to "Keep  
our quality of life"

We are requesting a minimum of fifteen minutes for a power  
point presentation at the Public Hearing May 13,2013 6:30 pm  
Sanitation Districts L.A. County Boardroom, 1955 Workman Mill  
Road, Whittier, CA. 90601.

Thank you for your consideration.

Sincerely,



Marilyn Kamimura

# **Attachment B**

**Clean Air Coalition of  
North Whittier and Avocado Heights**  
843 Caraway Drive, Whittier, Ca 90601 (626) 330-9365  
E-Mail Contact: Vicki Anderson itsvic@roadrunner.com

Richard & Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca 90601

April 30, 2013

Department of Regional Planning of County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

MAY - 2 2013

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8**

Dear Regional Planning Commissioners:

We are forty year residents of Whittier/Avocado Heights. Because we want to preserve the "quality of life" of this community, we ask that you deny the Sanitation Districts of Los Angeles County's request for modification 8.

Traveling during peak hours is NOT FEASIBLE for the following reasons:

Sanitation Districts fact sheet document 2414120, dated after their formal denial February 19, 2013, Section 6, OTHER RATIONAL FOR SUPPORTING MODIFICATION states

a. "depends on a balance of privately and public owned and operated facilities providing service to residents of the county."---This balance was developed to provide an ENVIRONMENTALLY SENSITIVE AND COST EFFECTIVE SOLID WASTE disposal system for the County's residents.

**Firstly, not feasible, NOT ENVIRONMENTALLY SENSITIVE.**

Besides the PHMRF and their Downey (DART) facility there are other private MRFs located in Azusa, City of Industry, Pomona and soon in the City of Irwindale.

To be ENVIRONMENTALLY SENSITIVE is to have the private hauler pick up solid waste in their location, take waste to a MRF in their location and the residual waste hauled to a local landfill. From documentation received at the Board of Directors meeting of the Sanitation Districts April 24, 2013, seven bids to truck waste to local landfills were received. This indicates there is disposal capacity locally.

The PHLF will close October 2013, and using, as an example, if a private hauler is contracted as far as Pomona, they would come out of area, through the PHMRF, back to Pomona and their residual now trucked to Olina Alpha Landfill in Orange County (contracted imported waste with the Sanitation Districts). The approved traffic route is the 57 Orange Freeway to Imperial Highway, Route 90. We can assume the trucks have to travel the 60 or 605 Freeways.

Why congest our roads and freeways anymore than necessary? Why encourage more waste to come here?

**Secondly, not feasible, NOT COST EFFECTIVE.**

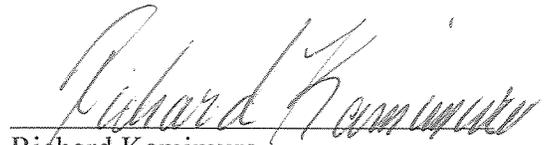
As a governmental agency, the Sanitation Districts directive is to MANAGE solid waste, thus they cannot pick up solid waste. They depend on the hauler to bring it to the PHMRF. Giving Sanitation Districts unlimited 6 days a week inbound and outbound will provide them unfair advantage over the majority of the private MRFs. It is my understanding that Grand Central in the City of Industry is permitted for 24 hours but has chosen to limit their hours because of financial feasibility. Will the Sanitation Districts use taxpayers' money to be more "competitive" when it is not financially feasible to increase hours? All to garner the MRF market.

Deny this modification and let them first prove to be environmentally sensitive and cost effective with the hours this permit presently has.

Sincerely,



Marilyn Kamimura  
Chairperson



Richard Kamimura  
Co-Chairperson

**Clean Air Coalition of  
North Whittier and Avocado Heights**  
843 Caraway Drive, Whittier, Ca 90601 (626) 330-9365

---

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.I**

Dear Regional Planning Commissioners:

We represent the residents (sensitive receptors) of the communities of Gladstone, Whittier Woods, Avocado Heights to include North Whittier and Bassett.

In reference to the DEIR prepared for the PHIMF located at 2500 Pellissier Place a project connected to the PHMRF, the DEIR shows a predominately northern wind pattern. Predominately northerly winds travel over our communities. We will be impacted by increased foul air, dust and diesel pollution from approximately 1,700 diesel trucks daily, moving 4,400 tons of garbage if this modification is passed.

**A. ISSUE OF FOUL AIR, DUST AND DIESEL POLLUTION**

Disposing of garbage into the Puente Hills Landfill with diesel trucks at a higher elevation keeps foul air, dust and diesel pollution elevated, allowing greater dispersion and dilution. The PHMRF is located at the base of the landfill with garbage being trucked into a building that will never be empty. Both situations have reduced dispersion and dilution of pollutants. This foul concentration and health hazard will eventually disperse in a northerly direction. We now have this burden forever.

**REQUEST:**

1. Monitoring of harmful emissions and dust by SCAQMD within the perimeter of the location at maximum capacity.
2. The emission monitoring results compared with the year baseline taken in 2008 by SCAQMD located on 2190 Pellissier Place.
3. A two-year report of odor complaints recorded by Sanitation Districts of L.A. County and SCAQMD of their Dart facility in Downey. Are they a "good neighbor"?
4. Report on how the Sanitation Districts have complied with SCAQMD Rule 410 (Odors from Transfer Stations and Material Recovery Facilities and Rule 1193 (Clean on-Road Residential and Commercial Refuse Collection Vehicles. Both rules passed after PHMRF received their CUP.

**B. ISSUE OF SIGNIFICANT IMPACT TO COUNTY ROADWAYS AND INTERSECTION INTO OUR COMMUNITY ROADWAYS**

The 1992 DEIR prepared for the PHMRF is outdated and incomplete in reference to traffic impact analysis to include Workman Mill Road, Peck Road, Pellissier Place, Crossroads

---

Department of Regional Planning  
April 23, 2013  
Page 2

Parkway South and North, the I-605 interchange at Peck Road and the SR-60 interchange at Crossroads Parkway.

1. The CUP for the PHMRF was passed in 1999 and the CUP for PHIMF in 2008. Each traffic impact analysis was done separately. To accurately assess traffic impact to the major arteries (freeways) and local roadways the projects must be connected.
2. The DEIR #93121114, Volume II Technical Appendices Impact Analysis uses the years of 1996 to 2005. Since then the following changes have occurred in the area:
  - Truck traffic from FedEx, UPS and Gateway Pointe Industrial Park off Workman Mill Road.
  - The carpool lane off the 60 Freeway, eighty five percent of the PHMRF traffic exits Crossroads Parkway onto the 60 Freeway. A proposition 65 environmental impact warning was placed on that carpool project. Why? Cars entering the carpool lane may move more easily, but it makes room for more vehicles and trucks to use the freeway.

**REQUEST:**

Updated Traffic Impact Analysis

**C. ISSUE OF STATEMENT SANITATION DISTRICT “IMPROVING VIABILITY OF THE PHMRF TO COMPETE WITH OTHER PRIVATELY-OWNED FACILITIES**

Directive of the Sanitation Districts of L.A. County is to “manage the county’s waste. It is not to compete with the private sector. The private sector has a choice in how they manage their waste collection and meet their 50% recycling goals.

**REQUEST:**

Viability to compete means financial gain. The 78 cities and unincorporated county’s gain. We are a small community of people who were here before the Sanitation Districts of L.A. County grew to take one third of L.A.’s garbage and bring it to our backyards. We have sacrificed enough. Keep the Sanitation Districts of L.A. County PHMRF at its present restriction. Let it be a shared sacrifice.

Sincerely,

---

Marilyn Kamimura et al.  
Chairperson

---

Richard Kamimura  
Co-Chairperson

cc: Gloria Molina, Los Angeles County Supervisor, 1<sup>st</sup> District  
Assemblymember Calderon, District 57  
Attach: Members

Clean Air Coalition of  
North Whittier and Avocado Heights  
Members

---

Luis F. Marchén  
Luis F. Marchin

Joan M. Rozzi  
Joan Rozzi

Margaret A. Caster  
Margaret A. Caster

Vickie Anderson  
Vickie Anderson  
itsvic@roadrunner.com

Teresa Aguilar  
Teresa Aguilar

Arline Hernandez  
Arline Hernandez

Hank Oga  
Hank Oga

Rachael O. Cervera  
Rachael O. Cervera

Raul Santos  
Raul Santos

Sara Santos  
Sara Santos

Nellie Rivas  
Nellie Rivas

Armida Hernandez  
Armida Hernandez

Belia Avila  
Belia Avila

Nina Najera

**Clean Air Coalition of  
North Whittier and Avocado Heights**

- Too much foul air, dust and noise pollution
- Too much diesel pollution (trash trucks)
- Traffic jam forever

**WE HAVE HAD ENOUGH**

**STOP** THE LOS ANGELES COUNTY SANITATION DISTRICTS,  
FROM EXPANDING TO 24 HOURS A DAY, 6 DAYS A WEEK,  
TRANSPORTING GARBAGE IN TRUCKS, DURING PEAK HOURS

We, the citizens of North Whittier and Avocado Heights petition  
To Deny Permit No. 92-251 PHMRF CUP Modification 8

Department of Regional Planning, c/o Maral Tashjian, Director  
320 W. Temple St., Los Angeles, CA 90012

NAME	ADDRESS	PHONE/EMAIL
Leora		
Maricela Zuniga	1333 Goodhart Ave. Whittier CA 90701	
Wayne Zu	1344 Goodhart Ave Whittier	
Cecilia Sozale	820 Venemead, Whittier	
Rubén Saavedra	1334 Goodhart Ave, Whittier	
David San	1345 S. Goodhart Ave. Whittier	
Raul Sant	1339 Goodhart Ave	raulitots11@gmail.com
Sara Santos	1339 Goodhart Ave Whitt	
Julie Aguilar	13343 E. LOWMONT ST. Whittier	

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

Deny CUP 92-251 Modification 8 request.

Too much traffic and congestion also aggravated by accidents. I am a long time community resident that knows we have to live with a bad situation forever.

In 1999 when CUP 92-251 was passed, the off peak hours of travel was to mitigate traffic and pollution from Findings 38 and recommendations from SCAQMD in 1992 EIR.

From document 2414120, Fact sheet, Sanitation Districts using their 1992 EIR, average and maximum for the PHLF and PHMRF, they are showing less overall on truck trips and tonnage.

To be truly accurate there must be an updated traffic study together with an environment assessment for all future projects to include PHIMF that feed into the 60, 10, and 605 freeways. With improved economic growth, commercial and local street traffic will increase. This document uses 2013 and at 1% growth, where do they get this assumption? Based on what?

Allowing garbage trucks to travel during peak hours will aggregate an already bad situation.

Sincerely,

  
750 VINEMEAD DR.  
WHITTIER, CA 90601

Clean Air Coalition of  
North Whittier and Avocado Heights

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

Deny CUP 92-251 Modification 8 request.

Too much traffic and congestion also aggravated by accidents. I am a long time community resident that knows we have to live with a bad situation forever.

In 1999 when CUP 92-251 was passed, the off peak hours of travel was to mitigate traffic and pollution from Findings 38 and recommendations from SCAQMD in 1992 EIR.

From document 2414120, Fact sheet, Sanitation Districts using their 1992 EIR, average and maximum for the PHLF and PHMRF, they are showing less overall on truck trips and tonnage.

To be truly accurate there must be an updated traffic study together with an environment assessment for all future projects to include PHIMF that feed into the 60, 10, and 605 freeways. With improved economic growth, commercial and local street traffic will increase. This document uses 2013 and at 1% growth, where do they get this assumption? Based on what?

Allowing garbage trucks to travel during peak hours will aggregate an already bad situation.

Sincerely,

Melissa Rivas

626-664-2808

1216 S. Whittier Blvd.  
Whittier CA 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

Deny CUP 92-251 Modification 8 request.

Too much traffic and congestion also aggravated by accidents. I am a long time community resident that knows we have to live with a bad situation forever.

In 1999 when CUP 92-251 was passed, the off peak hours of travel was to mitigate traffic and pollution from Findings 38 and recommendations from SCAQMD in 1992 EIR.

From document 2414120, Fact sheet, Sanitation Districts using their 1992 EIR, average and maximum for the PHLF and PHMRF, they are showing less overall on truck trips and tonnage.

To be truly accurate there must be an updated traffic study together with an environment assessment for all future projects to include PHIMF that feed into the 60, 10, and 605 freeways. With improved economic growth, commercial and local street traffic will increase. This document uses 2013 and at 1% growth, where do they get this assumption? Based on what?

Allowing garbage trucks to travel during peak hours will aggregate an already bad situation.

Sincerely,

  
13343 E. Loumont St.  
Whittier, Ca 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

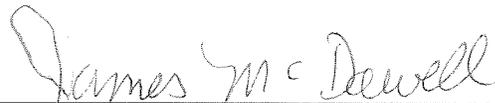
Dear Regional Planning Commissioners:

It is now 3:00 a.m. – Why am I awake and writing to you? A constant rumbling, pulsating noise comes from the power plant on the hill and is loud enough to wake me up every day after a sound sleep. It almost sounds like a bad swimming pool pump motor.

My wife and I have lived in this community for 21 years and are within a mile from the Material Recovery Facility. For several years I complained about the noise to the officials at the Sanitation Districts of Los Angeles County to no avail. We have had to endure the noise at a constant frequency 24 hours a day, seven days a week for years and it has affected my life. We also have issues with odor, dust and traffic.

We have all these problems and no satisfaction. Now the Sanitation Districts wants to expand their hours of operation. And what do we hear from the officials: Oh no, no need to worry, oh no, we will not let the expansion intrude on the residents. The quality of life here in North Whittier and Avocado Heights really needs to be addressed. You can stop the expansion, but you must not ignore the very things that most impact our everyday lifestyle. I say **DENY** this modification and stay with the original conditional use permit.

Sincerely,



---

Jim McDowell  
1543 Lacewood  
Whittier, Ca 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

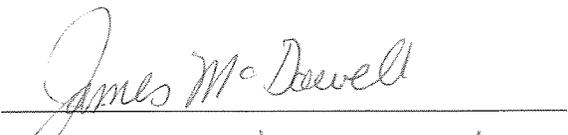
As a long time resident of Avocado Heights to include North Whittier and Bassett, I am against 92-251 PHMRF CUP Modification 8.

Under the project summary – Burden of Proof dated February 19, 2013, there was no adjustment to the addendum to the FEIR for the Puente Hills Material Recovery Facility. The summary says that “requested use at the location will not” and “further the PHMRF has been in continuing successful commercial operation since July 2005, and during this time the facilities, including all prescribed features, have been adequate for the facility.”

If this facility has only run a maximum of 150 tons per day since 2005 but are permitted for 4400 tons per day, let them prove themselves first before they can document they are “adequate” and the location will not.”

Deny this modification request, let them prove themselves.

Sincerely,

  
\_\_\_\_\_  
1543 Lacewood  
Whittier, Ca. 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

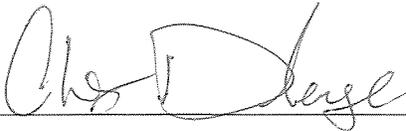
I am a resident of Avocado Heights to include North Whittier and Bassett. Our community is located downwind from the location of the PHMRF. Having endured the foul odor from the landfill on many occasions, the PHMRF when it is at full capacity of 4400 tons per day with 1700 garbage truck cargo will only increase the foul air, dust, diesel and noise pollution to our area.

The EIR was done in 1992 with a final permit issued in 1999. The off peak hours of travel as part of CUP 92-251 was put in for a reason. It was to mitigate an already impacted area.

Why add back the impact?

Deny Permit #92-251 PHMRF Modification 8.

Sincerely,

  
\_\_\_\_\_

1533 Workman Mill  
Whittier, Ca. 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

As a long time resident of Avocado Heights to include North Whittier and Bassett, I am against 92-251 PHMRF CUP Modification 8.

Under the project summary – Burden of Proof dated February 19, 2013, there was no adjustment to the addendum to the FEIR for the Puente Hills Material Recovery Facility. The summary says that “requested use at the location will not” and “further the PHMRF has been in continuing successful commercial operation since July 2005, and during this time the facilities, including all prescribed features, have been adequate for the facility.”

If this facility has only run a maximum of 150 tons per day since 2005 but are permitted for 4400 tons per day, let them prove themselves first before they can document they are “adequate” and the location will not.”

Deny this modification request, let them prove themselves.

Sincerely,

  
P.O. Box 70502  
Pasadena, Ca. 91117

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

As a long time resident of Avocado Heights to include North Whittier and Bassett, I am against 92-251 PHMRF CUP Modification 8.

Under the project summary – Burden of Proof dated February 19, 2013, there was no adjustment to the addendum to the FEIR for the Puente Hills Material Recovery Facility. The summary says that “requested use at the location will not” and “further the PHMRF has been in continuing successful commercial operation since July 2005, and during this time the facilities, including all prescribed features, have been adequate for the facility.”

If this facility has only run a maximum of 150 tons per day since 2005 but are permitted for 4400 tons per day, let them prove themselves first before they can document they are “adequate” and the location will not.”

Deny this modification request, let them prove themselves.

Sincerely,



1033 Bunbury  
Whittier, Ca. 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

I am a resident of Avocado Heights to include North Whittier and Bassett. Our community is located downwind from the location of the PHMRF. Having endured the foul odor from the landfill on many occasions, the PHMRF when it is at full capacity of 4400 tons per day with 1700 garbage truck cargo will only increase the foul air, dust, diesel and noise pollution to our area.

The EIR was done in 1992 with a final permit issued in 1999. The off peak hours of travel as part of CUP 92-251 was put in for a reason. It was to mitigate an already impacted area.

Why add back the impact?

Deny Permit #92-251 PHMRF Modification 8.

Sincerely,

  
1023 BUNBURY DRIVE  
WHITTIER, CA 90601

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Permit #92-251 PHMRF CUP Modification 8

Dear Director of Planning

I am a resident of North Whittier, unincorporated area, located at the junction of the I-60 (Pomona) Fwy and the I-605 Fwy.

I oppose the Sanitation District of Los Angeles attempt to modify the original CUP by extending the hours of operation of the PHMRF to 24 hours a day. This will increase the number of trash trucks by at least 50 to 80 trucks per hour when that facility reaches maximum capacity. This is unacceptable for residents living in this critical area.

Before your department gives final approval for this, we urge you to consider the health and well being of this community as paramount over any financial or political gain. We, therefore, request that a new environmental impact study be conducted prior to approval.

Thank you for your consideration.

Sincerely,

  
  
750 Vinemead Ar.  
Whittier, Ca. 90601

Clean Air Coalition of  
North Whittier and Avocado Heights

April 23, 2013

Department of Regional Planning, County of Los Angeles  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Regional Planning Commissioners:

I am a resident of Avocado Heights to include North Whittier and Bassett. Our community is located downwind from the location of the PHMRF. Having endured the foul odor from the landfill on many occasions, the PHMRF when it is at full capacity of 4400 tons per day with 1700 garbage truck cargo will only increase the foul air, dust, diesel and noise pollution to our area.

The EIR was done in 1992 with a final permit issued in 1999. The off peak hours of travel as part of CUP 92-251 was put in for a reason. It was to mitigate an already impacted area.

Why add back the impact?

Deny Permit #92-251 PHMRF Modification 8.

Sincerely,

  
\_\_\_\_\_  
133 Goodheart Ave,  
N. Whittier, Ca. 90601  
626-715-1574

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Permit #92-251 PHMRF CUP Modification 8

Dear Director of Planning

I am a resident of North Whittier, unincorporated area, located at the junction of the I-60 (Pomona) Fwy and the I-605 Fwy.

I oppose the Sanitation District of Los Angeles attempt to modify the original CUP by extending the hours of operation of the PHMRF to 24 hours a day. This will increase the number of trash trucks by at least 50 to 80 trucks per hour when that facility reaches maximum capacity. This is unacceptable for residents living in this critical area.

Before your department gives final approval for this, we urge you to consider the health and well being of this community as paramount over any financial or political gain. We, therefore, request that a new environmental impact study be conducted prior to approval.

Thank you for your consideration.

Sincerely,

 Carlos M. S., P.E.

1477 Belgreen Drive  
Whittier, CA 90601

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Permit #92-251 PHMRF CUP Modification 8

Dear Director of Planning

I am a resident of North Whittier, unincorporated area, located at the junction of the I-60 (Pomona) Fwy and the I-605 Fwy.

I oppose the Sanitation District of Los Angeles attempt to modify the original CUP by extending the hours of operation of the PHMRF to 24 hours a day. This will increase the number of trash trucks by at least 50 to 80 trucks per hour when that facility reaches maximum capacity. This is unacceptable for residents living in this critical area.

Before your department gives final approval for this, we urge you to consider the health and well being of this community as paramount over any financial or political gain. We, therefore, request that a new environmental impact study be conducted prior to approval.

Thank you for your consideration.

Sincerely,

*Mrs. Margaret A. Carter*  
*2308 Gale St*  
*Whittier, CA 90601*  
*(562) 695-6627*

Department of Regional Planning  
County of Los Angeles  
320 W Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Modification of Permit #92-251 PHMRF CUP

Dear Director of Planning,

I understand from my neighbors that the LA County Sanitation District is planning to operate the Material Recovery Center around the clock once the Puente Hills land fill is closed in October of this year. This could be a disaster in terms of traffic congestion. Do you realize how congested the traffic flow is already? Even if you add only ten slow moving trucks into traffic during the rush hour, it could bring both the 605 and 60 Freeways to a complete stop, especially the west bound Pomona Fwy. And there will be alot more trucks than just ten when the PHMRF is running at full capacity (more like 50 to 100 trucks). Think what this will do to air quality when traffic is at a complete stand still

I know there has been a lot of money already invested in this project, and that the politics within the county government makes it very difficult to change course. But your primary responsibility, as the Dept. Of Planning, is to ensure the safety of this community.

Respectfully, .

*Beent Danks*  
1339 Goodheart ave.  
New Britain, Ca.  
626-715-1519

Department of Regional Planning  
County of Los Angeles  
320 W Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Modification of Permit #92-251 PHMRF CUP

Dear Director of Planning,

I understand from my neighbors that the LA County Sanitation District is planning to operate the Material Recovery Center around the clock once the Puente Hills land fill is closed in October of this year. This could be a disaster in terms of traffic congestion. Do you realize how congested the traffic flow is already? Even if you add only ten slow moving trucks into traffic during the rush hour, it could bring both the 605 and 60 Freeways to a complete stop, especially the west bound Pomona Fwy. And there will be alot more trucks than just ten when the PHMRF is running at full capacity (more like 50 to 100 trucks). Think what this will do to air quality when traffic is at a complete stand still

I know there has been a lot of money already invested in this project, and that the politics within the county government makes it very difficult to change course. But your primary responsibility, as the Dept. Of Planning, is to ensure the safety of this community.

Respectfully, .

*Rachel Mendez*  
1533 Workman Mill  
Whittier, Ca. 90607

Department of Regional Planning  
County of Los Angeles  
320 W Temple Street  
Room 1348  
Los Angeles, CA 90012

Subject: Modification of Permit #92-251 PHMRF CUP

Dear Director of Planning,

I understand from my neighbors that the LA County Sanitation District is planning to operate the Material Recovery Center around the clock once the Puente Hills land fill is closed in October of this year. This could be a disaster in terms of traffic congestion. Do you realize how congested the traffic flow is already? Even if you add only ten slow moving trucks into traffic during the rush hour, it could bring both the 605 and 60 Freeways to a complete stop, especially the west bound Pomona Fwy. And there will be alot more trucks than just ten when the PHMRF is running at full capacity (more like 50 to 100 trucks). Think what this will do to air quality when traffic is at a complete stand still

I know there has been a lot of money already invested in this project, and that the politics within the county government makes it very difficult to change course. But your primary responsibility, as the Dept. Of Planning, is to ensure the safety of this community.

Respectfully, .

*Arnida Hernandez  
1209 Grossmont DR.  
Whittier, CA 90601*

Clean Air Coalition of  
North Whittier and Avocado Heights

April 25, 2013

Department of Regional Planning, County of L.A.  
320 West Temple Street, Room 1348  
Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Regional Planning Commissioners:

Keep the Sanitation Districts of L.A. County at their present condition, deny their request for modification 8.

As a long time resident of North Whittier and Avocado Heights we have endured the odor, dust, diesel fumes and noise with the growth of the Puente Hills Landfill for over 40 years.

This request for modification is only a GUISE toward expansion. In the findings for CUP 92-251, 1999 under condition 7.

"Fee levelization program so that it would cost the same amount to deposit waste at the PHLF as it does at the Puente Hills Material Recovery Facility. According to the Sanitation District, the subsidy that would be made possible by "leveling" fees at the Puente Hills Landfill is a critical factor in making waste-by-rail an affordable waste disposal option in L.A. County."

The Puente Hills Landfill closes Oct. 2013 at an average tonnage of 8,000 Tpd. The PHMRF is permitted for 4400 tpd. The fact that the closure of 2013 may not have been in play and at its economic low tonnage is only logical that the "fees" must be made up somewhere. "Leveled" to at least 8,000 tpd.

The Sanitations request for change in hours is only a start toward their expansion of the PHMRF.

We have had enough. Let other communities share in this NEGATIVE QUALITY OF LIFE BURDEN.

Sincerely,

*Bernie Cano*

*819 CARAWAY*

*N. Whittier, 90601*

Clean Air Coalition of  
North Whittier and Avocado Heights

April 25, 2013

Department of Regional Planning, County of L.A.  
320 West Temple Street, Room 1348  
Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Regional Planning Commissioners:

Keep the Sanitation Districts of L.A. County at their present condition, deny their request for modification 8.

As a long time resident of North Whittier and Avocado Heights we have endured the odor, dust, diesel fumes and noise with the growth of the Puente Hills Landfill for over 40 years.

This request for modification is only a GUISE toward expansion. In the findings for CUP 92-251, 1999 under condition 7.

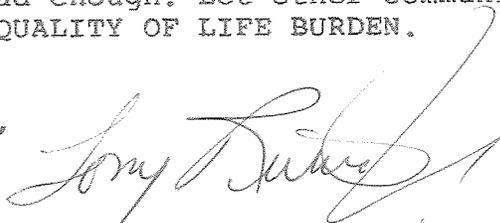
"Fee levelization program so that it would cost the same amount to deposit waste at the PHLF as it does at the Puente Hills Material Recovery Facility. According to the Sanitation District, the subsidy that would be made possible by "leveling" fees at the Puente Hills Landfill is a critical factor in making waste-by-rail an affordable waste disposal option in L.A. County."

The Puente Hills Landfill closes Oct. 2013 at an average tonnage of 8,000 Tpd. The PHMRF is permitted for 4400 tpd. The fact that the closure of 2013 may not have been in play and at its economic low tonnage is only logical that the "fees" must be made up somewhere. "Leveled" to at least 8,000 tpd.

The Sanitation's request for change in hours is only a start toward their expansion of the PHMRF.

We have had enough. Let other communities share in this NEGATIVE QUALITY OF LIFE BURDEN.

Sincerely,

  
917 Cunningham  
N. Whittier, Ca. 90601

**Clean Air Coalition of  
North Whittier and Avocado Heights**

April 25, 2013

Department of Regional Planning, County of L.A.  
320 West Temple Street, Room 1348  
Los Angeles, Ca.90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Regional Planning Commissioners:

Keep the Sanitation Districts of L.A. County at their present condition, deny their request for modification 8.

As a long time resident of North Whittier and Avocado Heights we have endured the odor, dust, diesel fumes and noise with the growth of the Puente Hills Landfill for over 40 years.

This request for modification is only a GUISE toward expansion. In the findings for CUP 92-251, 1999 under condition 7.

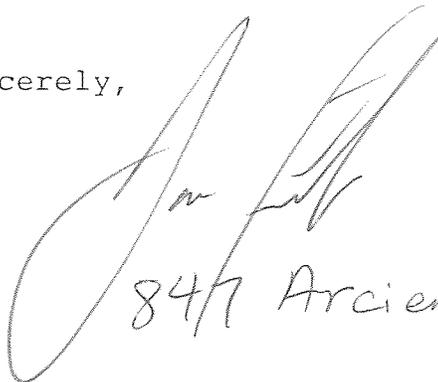
"Fee levelization program so that it would cost the same amount to deposit waste at the PHLF as it does at the Puente Hills Material Recovery Facility. According to the Sanitation District, the subsidy that would be made possible by "leveling" fees at the Puente Hills Landfill is a critical factor in making waste-by-rail an affordable waste disposal option in L.A. County."

The Puente Hills Landfill closes Oct. 2013 at an average tonnage of 8,000 Tpd. The PHMRF is permitted for 4400 tpd. The fact that the closure of 2013 may not have been in play and at its economic low tonnage is only logical that the "fees" must be made up somewhere. "Leveled" to at least 8,000 tpd.

The Sanitations request for change in hours is only a start toward their expansion of the PHMRF.

We have had enough. Let other communities share in this NEGATIVE QUALITY OF LIFE BURDEN.

Sincerely,



847 Arciero N. Whittier 90601

Armando D. and Rachael Cervera

1433 Belgreen Dr.

Whittier, Ca. 90601

February 7, 2013

Department of Regional Planning, County of L.A

c/o Director of Planning

320 West Temple St

Room 1348

Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.,

Dear Director of Planning,

Currently, the PHMRF CUP modification 8., as proposed, is detrimental to the health and well being of residents like us in the North Whittier area, situated directly back to back with the California Country Club. We reside in unincorporated North Whittier, Ca. The negative impact that the proposed project will have on our environment may be anything from dust and diesel pollution, noise pollution, and an increase of foul air. More importantly, the increased numbers of garbage trucks along side and parallel to the 60 Freeway and surface streets will definitely impact our community.

As residents of unincorporated La Puente and unincorporated Whittier for the past 40 years, we have experienced our community evolve, change and grow in numbers. Presently, it is at risk of being swallowed up by the many projects surrounding the perimeter. Traffic is the number one concern we have noticed and witnessed firsthand. We have observed the change in traffic patterns, traffic jams, and traffic pollution. We have witnessed an increase in traffic accidents- some fatal, caused by semi-trucks and tractor trailers causing endless back-ups on the 60 Freeway all too often. There have been power outages caused by cars and trucks racing on Workman Mill Rd. at a rate often over 45 miles per hour. We have watched commuters use this road as a thoroughfare to access both the 605 and 60 freeways, and have seen the back up of automobiles and trucks, as drivers attempt to access the 10 freeway when the 60 freeway is closed down due to spillages.

Likewise, we have even heard these accidents and can always tell if there will be delays up to one to three hours as helicopters hover over our community constantly. The traffic backups have been over the top. It is no secret, that Crossroads Parkway has been mentioned in the many traffic reports over the years as the location of numerous accidents both during peak hours and off peak hours. It is no coincidence that this is the on and off ramp which leads directly into the landfill and is direct access to

the PHMRF. When just one traffic light signal is out, the impact and traffic stall created from Valley Blvd. on the east to Pellissier Rd to the Southwest is unbearable. There is also the Rio Hondo Community College which is located next door to the PHMRF, which may impact student commuters and their access to the college with so much inbound and outbound garbage waste trucks going in and out 24 hours six days a week.

Additionally, we feel that we have given our lives and careers to public service over the past 40 years. We are told that we are the "Baby Boomers" and look forward to living our years in this community. However, as it appears today, our future appears to be very bleak, as we wonder if we will be affected by the many pollutants caused by emissions and diesel exhaust from trucks. (One of us is a Vietnam Veteran who has already served the country in battle.) We are now asking to be served by our own L.A. County Dept. of Planning by listening to us, and it is our hope that our concerns will be taken to heart.

Consequently, we bring this matter to your attention as we understand that the proposed project will allow garbage trucks to move garbage 24 hours a day 6 days a week. Obviously, residents have been told that there will be no impact however, it would be better for all concerned if there could be a current emission and dust monitoring by AQMD at full capacity. We deserve to come home each day to a clean and safe environment.

Sincerely,

Armando & Rachael Cervera

A handwritten signature in cursive script, reading "Armando & Rachael Cervera". The signature is written in black ink and is positioned below the typed name.

2

Victoria Anderson  
1039 Bunbury Dr.  
Whittier CA 90601

February 11, 2013

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012  
c/o Director of Planning

**RE: against modification of CUP 92251 condition 8**

Dear Director of Planning:

In reference to statements:

Section III AIR QUALITY (see page 7, ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PUENTE HILLS MATERIALS RECOVERY FACILITY JANUARY 2013)

\*Explanation

a - d No new impacts

“The PHMRF FEIR analyzed air quality impacts from the PHLF and the PHMRF operating concurrently at their maximum permitted capacity of 17,600 tons of refuse per day. These impacts mostly arose from air emissions from vehicles travelling to and from the PHLF and the PHMRF. The Board in certifying the PHMRF FEIR determined that remaining air quality impacts after mitigation due to the operation of the PHMRF, would be significant but unavoidable, that diversion of the waste stream elsewhere would result in higher air quality impacts, and that there is no feasible way to lessen or avoid any remaining effects. The Board balanced the benefits of the PHMRF project against unavoidable environmental risks and determined that the adverse environmental effects are considered acceptable.”

“The proposed elimination of hour restrictions at the PHMRF would allow refuse haulers in close proximity to the PHMRF, but previously unable to practically use the facility due to the hour restrictions, to now use the facility. This would provide for overall more efficient countywide transport of refuse to transfer/processing facilities, reducing average haul distance, traffic impacts, and air emissions.”

At present, there are in close proximity multiple MRFs with flexible hours. One is in Azusa, two in the City of Industry, and another is being built in Irwindale. A private hauler will go to the nearest, most convenient and cost efficient location. The Sanitation Districts are going on an assumption that a hauler will use their facility. On an assumption you are bringing more truck traffic to a location that is already a ‘HOT SPOT’ (impacted with traffic emissions, foul air, dust and noise).

A feasible way to lessen or avoid any remaining effects is not to increase hours. Let the haulers go elsewhere.

“The Board balanced the benefits of the PHMRF project against unavoidable environmental risks and determined that the adverse environmental effects are considered acceptable.”

Considered acceptable to whom???? NOT US.

Yours truly,



Vickie Anderson

Via Fax No.  
213-626-0434

February 8, 2013

Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, California 90012

**REF: Conditional Use Permit No. 92251 – Modification 8**

**This is our “Letter of Protest”**

It is bad enough that we have the largest garbage sorting facilities in the Los Angeles County and now you want to extend the hours of operation to 24 hours. How dare the regional commission adopt a proposal to extend operation hours.

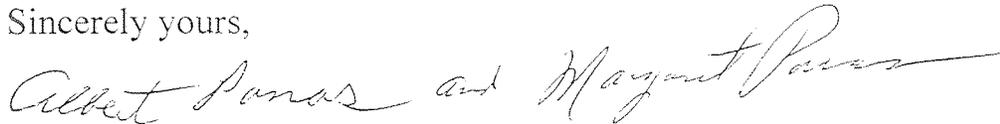
There are five other garbage sorting facilities surrounding our area that the garbage trucks can go to. There is no need to put our neighborhood through an increase of traffic, more air pollution, and noise.

Our home is located on the corner of Workman Mill Road near the MRF and landfill. Doesn't the County Sanitation District Board of Directors consider the impact it will have on our neighborhood? Our neighborhood should not have to put up with an increase of hours of operation. The 18 hours it already has should be decreased not increased Find other locations for their garbage sorting facilities. Enough is Enough!

The lies being told by the regional planning commissioners that traffic will go down and there is sufficient odor control measures in place are just that LIES!

The “Extended Hours of Operation Proposal” is a bad proposal. It needs to be stopped and other avenues taken. There is no reason to extend the hours when all they have to do is send - 6 additional hours - of garbage trucks to other areas.

Sincerely yours,



Albert and Margaret Porras  
1456 Gemwood Drive  
Whittier, CA 90601  
(626) 660-7643

**Clean Air Coalition of  
North Whittier and Avocado Heights**

February 7, 2013

Director of Planning  
Department of Regional Planning, County of Los Angeles  
320 W. Temple Street, Rm. 1348  
Los Angeles, CA 90012

RE: Permit #92-251 PHMRF CUP Modification 8

Dear Director:

As of January 20, 2013, I have been a resident of the Gladstone neighborhood (also included in Avocado Heights) for 50 years. Extreme changes have taken place in that time period. I am writing you to register my protest against the so-called "modification" permit mentioned above.

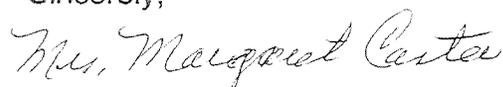
According to Webster's New World Dictionary, the word Modify means: 1. to change partially in character, form, etc. 2. to limit slightly. 3. to limit in meaning. It appears to me that rather than any limitation this Modification 8 is actually increasing use.

Example: Present limitation between the hours of 6:00 to 9:00 a.m. and 4:00 p.m. and 7:00 p.m. These are the hours when thousands of residents are driving to and from work. If you begin allowing trash trucks to enter the PHMRF during these hours it will only increase traffic, causing more and more congestion and pollution, to say nothing of the noise this would bring.

I am requesting that you do not pass this permit in consideration of, not only myself as a resident, but for my neighbors and future generations who would be living here and in the surrounding areas. If you would like proof of visible pollution I would invite you to come any day of the week to sweep my driveway and patio and see the amount of black soot that covers my property.

Please consider the requests of the residents of this area now, since up until this time we have not been considered. Thank you.

Sincerely,



Mrs. Margaret Caster  
2308 Gala Street  
Whittier, CA 90601

Original

P. 1 of 2

Concerned Residents of Unincorporated North Whittier

February 11, 2013

Dept. Of Regional Planning-County of L.A.

c/o Director of Planning

320 West Temple Street

Room 1348

Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Director of Planning,

We are opposed to Permit # 92-251 PHMRF Cup Modification 8. due to the environmental negative impact we will sustain as a result of this so-called modification. We reside directly in front of the California Country Club Golf Course, from Workman Mill Rd. to Belgreen Dr., located in unincorporated North Whittier. Our surrounding community and neighbors have responded to the article which appeared in the Whittier Tribune a few days ago and this is our input.

We are aware that it is called a modification, however it appears to be an expansion of what exists. This proposed project will allow garbage trucks to move garbage 24 hours a day 6 days a week. In as much as off peak hours are proposed, this modification is still viewed as an expansion for waste trucks to use the surrounding public roads leading to the facility. The proposed change to the existing schedule in and of itself, triggers questionable concerns of increased truck traffic and traffic flow, traffic jams increased spillages, accidents, dust and diesel pollution, noise pollution, foul air dispersed and dilution due to-disposing of garbage into the PHLF with diesel trucks at a higher elevation. It is unfounded to imagine that not operating during peak traffic times is a solution. One has only to drive on the 60 Freeway at any daylight hours and see the caravan of trucks for miles traveling east and west.

The common issues we share are by far environmental. We see what planners may not be able to see, as we are the residents who live here and some, 40 year residents. The prime concern that many of us have is the significant impact to the common roadways and intersections into our community roadways. (Specifically, Workman Mill Rd. on the north side of the 60 Freeway, Pellissier Rd. to the West and Crossroads Parkway which crosses and empties out on Workman Mill Rd, curves and also empties out to the off ramp at the 60 Freeway, both east and west where all trucks use to enter the Landfill.)

It is neither just, nor acceptable that this proposed project has not taken into consideration the changes in demographics, construction, freeway expansion, housing, industrial growth, global warming /weather patterns and the emissions monitoring since 1992. While traffic impact analysis reports were done for the PHMRF in 1999 and the CUP for the PHIMF in 2008, so much change has occurred over the

past five years, and needless to say since 1992. We feel that our health and welfare are at risk and that of our future generations. Additionally, there is the fear of a decrease in our property values.

Therefore, we request to keep the Sanitation Districts of L.A. County PHMRF at its present restriction, as we have already sacrificed enough, experiencing the daily traffic conditions and the results of those emissions over the years. We have seen the landfill grow and what with the Railway set to commence this year, it will pose additional noise and increased risk to our community. (This, not to mention the newly proposed Alameda Corridor, in the near future, which will further impact Workman Mill Rd. as the direct route from Valley Blvd. to the north.) Commuters and truck drivers have been using these thoroughfares mentioned above, for years. Signs are even posted in Montebello to DETOUR, using the back roads which lead to Peck Rd. then to Workman Mill Rd. As taxpayers and residents of this community, we deserve better. Thank you for your consideration in this matter. Please respond.

Respectfully,

Name KAZUE HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name YOSHIAKI HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name HISANO HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name Guillermo Carreon Address 1417 Belgreen Dr WH  
90601

Name Martha Carreon Address 1417 Belgreen Dr. WH.  
90601

Name J.F. HIDALGO Address 1440 GEMWOOD DR  
WH 90601

Name CARMEN R. HIDALGO Address 1440 GEMWOOD DR  
WH 90601

Name Hector Aguilar Address 1445 Gemwood Dr, WH  
90601

Name Maria Aguilar Address 1445 Gemwood Dr WH  
90601

1. ARMANDO D. CERVERA 1433 Belgreen DR, Whittier Ca  
90601

2. ARMANDO R. CERVERA 1433 Belgreen DR. Whittier Ca  
90601

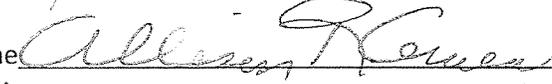
3. RACHAEL O. Cervera 1433 BELGREEN DR WHITTIER CA  
90601

past five years, and needless to say since 1992. We feel that our health and welfare are at risk and that of our future generations. Additionally, there is the fear of a decrease in our property values.

Therefore, we request to keep the Sanitation Districts of L.A. County PHMRF at its present restriction, as we have already sacrificed enough, experiencing the daily traffic conditions and the results of those emissions over the years. We have seen the landfill grow and what with the Railway set to commence this year, it will pose additional noise and increased risk to our community. (This, not to mention the newly proposed Alameda Corridor, in the near future, which will further impact Workman Mill Rd. as the direct route from Valley Blvd. to the north.) Commuters and truck drivers have been using these thoroughfares mentioned above, for years. Signs are even posted in Montebello to DETOUR, using the back roads which lead to Peck Rd. then to Workman Mill Rd. As taxpayers and residents of this community, we deserve better. Thank you for your consideration in this matter. Please respond.

Respectfully,

Name  Address 1400 Belgreen Dr.  
Solomon Cosentino Whittier, CA 90601

Name  Address 1433 Belgreen Dr  
ALLISON R. CERVERA Whittier, Ca 90601

Name \_\_\_\_\_ Address \_\_\_\_\_

past five years, and needless to say since 1992. We feel that our health and welfare are at risk and that of our future generations. Additionally, there is the fear of a decrease in our property values.

Therefore, we request to keep the Sanitation Districts of L.A. County PHMRF at its present restriction, as we have already sacrificed enough, experiencing the daily traffic conditions and the results of those emissions over the years. We have seen the landfill grow and what with the Railway set to commence this year, it will pose additional noise and increased risk to our community. (This, not to mention the newly proposed Alameda Corridor, in the near future, which will further impact Workman Mill Rd. as the direct route from Valley Blvd. to the north.) Commuters and truck drivers have been using these thoroughfares mentioned above, for years. Signs are even posted in Montebello to DETOUR, using the back roads which lead to Peck Rd. then to Workman Mill Rd. As taxpayers and residents of this community, we deserve better. Thank you for your consideration in this matter. Please respond.

Respectfully,

Name Maria C Serrano Address 1405 Belgreen Dr Whittier  
90601

Name JOE A SERRANO Address 1405 BELGREEN DR WHITT  
90601

Name ADRIAN D. SERRANO Address 1405 BELGREEN DR

Name Chanella A Sumino Address 1405 Belgreen Dr. Whittier  
90601

Name KATSU HARADA Address ~~1409~~ 1409 GEMWOOD DR. WHITTIER  
90601

Name MASAKO HARADA Address 1409 GEMWOOD DR. WHITTIER  
90601

Name Gloria Ledezma Address 1463 Belgreen Dr Whittier  
CA 90601

Name Otilio Ledezma Address 1463 Belgreen Dr Whittier  
CA 90601

Name \_\_\_\_\_ Address \_\_\_\_\_

**Clean Air Coalition of  
North Whittier and Avocado Heights**

Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca 90601  
(626) 330-9365 Fax (626) 330-9365

January 29, 2013

Department of Regional Planning, County of Los Angeles  
c/o Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Director of Planning:

As a resident of unincorporated North Whittier for 40 years and actively serving my community for over 20 years, I am against the modification of Condition 8.

In 1992 when the Sanitation Districts of L.A. County proposed the development of the PHMRF until its final permitting process in 1999, our community was oblivious. I was rudely notified of its coming when I saw it being constructed in the early 2000's.

I question the SanDistricts notification process. It came through too quietly. Proper notification to the communities of Gladstone, Whittier Woods, Avocado Heights to include unincorporated North Whittier and Bassett equal to the magnitude of the project and its environmental impacts was imperative.

Quote "The Addendum concluded....would not result in any increased or additional environmental impacts beyond those which were analyzed in the EIR....that supplement environmental analysis was not required". We deserve to know its environmental impacts analyzed in the EIR and the modification change to Item 8. and its added impacts this time. We deserve a public hearing.

Even for this modification proposal, I made a request to the Department of Regional Planning to extend the distance of formal notification, for pollution travels farther than 500 feet, and was denied. I was told it was up to the residents to put themselves on the notification list. A group of us made an effort. This notification process must not go through quietly.

Sincerely,



Marilyn Kamimura

February 12, 2013

Department of Regional Planning  
Attention: Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**PROTEST LETTER - PERMIT #92-251 PHMRF CUP MODIFICATION 8**

Dear Director of Planning:

I am against modification of CUP 92-251 Condition 8.

As a longtime resident that has already endured excessive noise from trains I question the initial study attached to the Notice of Determination that the noise from a 24-hour facility 6 days a week will have no impact. The noise WILL have a negative impact on this community. The movement of trucks as well as trucks dropping loads, unloading and loading will cause the trucks to emit more noise for the following reasons:

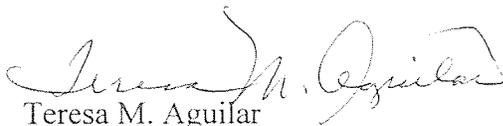
- The streets in the area are lined with buildings influencing traffic noise.
- The buildings will trap noise and increase its effects.

The residents in close vicinity will have to take the brunt of most of the excessive noise for 24 hours.

We already have to endure the noise emitted by trains, which include loud continuous whistles and horns in the early morning and late evening. This has caused stress, high blood pressure and sleep loss to me and my neighbors.

The Sanitation Districts do not have unlimited rights to broadcast noise as they please by producing noise pollution and acting like a bully in a school yard. They disregard the rights of others and claim for themselves rights that are not theirs.

Sincerely,



Teresa M. Aguilar  
13343 E. Loumont St.  
Whittier, Ca. 90601  
Ph: (626) 330-2898  
E-mail: tajalauren@roadrunner.com

①

**Clean Air Coalition of  
North Whittier and Avocado Heights**

Richard H. Kamimura  
and Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca. 90601  
626-3309365 Fax 626-3309365

February 11, 2013

Department of Regional Planning  
County of Los Angeles  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, CA. 90012

Re: Permit # 92-251 PHMRF CUP modification 8.

Dear Director of Planning:

As longtime residents that have lived with the impact of a landfill in our backyard and another MURF in close vicinity, we are against this modification.

In 1999 when the PHMRF received its restricted hours, the closure of the landfill of October 2013 reducing 13,200 tons per day of trash was already part of the scenario.

By modifying condition 8. to 24 hours 6 days a week there will now be a reversal. As an example, a carpool lane moves more traffic through easier, more hours makes it easier to move more garbage trucks through.

The fact that the Sanitation Districts of L.A. County does not want to follow the scenario of less we can only resolve this process of modification is a guise for EXPANSION.

By moving in this direction of increasing hours you will be approving the reckless disregard of the health, welfare and quality of life of taxpaying residents that are expected to endure these facilities forever.

We have had enough.

Sincerely,



Richard H. Kamimura



Marilyn Kamimura

**Clean Air Coalition of  
North Whittier and Avocado Heights**

January 30, 2013

Department of Regional Planning, County of L.A.  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, CA. 90012

Re: Permit # 92-251 PHMRF CUP Modification 8.

Dear Director of Planning:

As a resident of Avocado Heights to include North Whittier,  
I am against the modification of condition 8.

In reference to CUP 92251 Burden of Proof Attachment D,  
under additional response and A 1,2,3.

\* Comment "accepts 150 tons per day"  
Comment "Boehmke (Department Head Solid Waste Mgt. Dept.)  
The facility accepts 50 to 60 trucks on average per day.  
Its not anticipated that the amount of trucks will in-  
crease significantly---he added." Article dated Jan.7, 2013,  
San Gabriel Tribune, attached.

\*Compare the DEIR information that maximum capacity of 4400  
tons per day: Trip generation

Employees	1190
Refuse Vehicles	1050
Container outloading PHMRF to PHIMF	370
Recovered material outload	290
	2900 Trips per day

The Burden of proof clause that the PHMRF "will not" affect  
health---materially detrimental to the use---jeopardize---  
public health---general welfare, can only be tested when the  
PHMRF is at maximum capacity with a building that will never  
be empty .

ARE WE TO BE THE GUINEA PIGS?

Sincerely,  


Nellie Rivas  
1216 Grossmont  
Whittier, CA. 90601

Clean Air Coalition of  
North Whittier and Avocado Heights

Richard H. Kamimura  
843 Caraway Drive  
Whittier, Ca. 90601  
626-3309365 Fax 626-3309365

January 29, 2013

Department of Regional Planning, County of L.A.  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Director of planning:

As a resident of unincorporated North Whittier for 40 years and being negatively impacted by a Material Recovery Facility in our area, I am against the modification of condition 8.

A supplemental environmental analysis is necessary for the following reasons.

1-In the DEIR #91129070 page 4.8-19 Air Quality, Mitigation measures-Mobile Sources"incorporated into the proposed project to reduce emissions from mobile sources and are recommended by the SCAQMD", item one is scheduling during off peak hours and reduce peak hours of travel.

\*You are now making a change by removing a mitigation. By removing a mitigation an environmental addendum is necessary.

2-In the DEIR # 9312114 Volume II Technical Appendices page 44 under 4.1 Truck generation, it states" if public roads are used for the transfer of the residual waste from the PHMRF to the intermodal facility---,the outloading of the residual waste would not occur during the peak morning or afternoon traffic hours of 6:00am to 9:00 am and 4:00pm and 7:00pm respectively. The PHIMF is presently not operating thus the outloading will be 100% by trucks using public roads.

\*The PHIMF not presenting operating opens up a review of truck generation on public roads during peak hours.

Sincerely,



Richard H. Kamimura

**Clean Air Coalition of  
North Whittier and Avocado Heights**

Victoria Anderson  
1039 Bunbury Dr.  
Whittier CA 90601

January 30, 2013

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012  
c/o Director of planning

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8**

Dear Director of Planning:

I am a resident of the community of North Whittier. I understand you are requesting a change to Condition 8 that would allow traffic 24 hours a day, 6 days a week. Your requested modification does absolutely nothing to mitigate any impact to the community with regard to traffic and pollution, and essentially just eliminates the original restrictions.

Claiming that the original traffic analysis patterns (obtained in 1999) are applicable 13 years later is absurd. To name a few changes, traffic has increased due to:

- FedEx
- UPS
- Gateway Pointe Industrial Park
- Rio Hondo College
- New businesses on Crossroads Parkway

Since 1957, this area has endured Los Angeles County trash with the accompanying increase in traffic and pollution. Does the PHMRF uphold the commitment of the landfill to protect the value of nearby properties?

At the very least:

- A new traffic study must be done and it must be required to include a larger area than the original.
- A study must be repeated for air quality. It is my understanding the AQMD originally recommended scheduling mobile sources during off peak hours and reduce peak hours of travel. See DEIR #91129070 page 4.8 - 19

In addition, kindly increase notifications to individuals living more than 500 ft of the facility. This sort of thing affects people miles away.

Yours truly,

  
Vickie Anderson

Henry J. Oga  
Grace W. Oga  
750 Vinemead Drive  
Whittier, Ca 90601

Director of Planning  
Department of Regional Planning  
County of Los Angeles

Dear Director,

This letter is in response to the notice sent out by the Department of Regional Planning regarding the request to modify CUP No. 92251. The purpose of this letter is to voice our opposition to the granting of this request for the following reasons:

1. Environmental Impact Report (EIR) 1992

The EIR referred to by the Sanitation District's original report, and upon which the original CUP is based is completely outdated and is totally irrelevant to this request to change the hours of operation. This report was taken 21 years ago and conditions have dramatically changed. We have lived in this area over 40 years and have seen these changes take place. Is it reasonable and logical for this request to change any condition of the original CUP without requiring a new EIR study to be undertaken which would be accurate and reflect current conditions in this area? The Sanitation Districts in their zeal to proceed with the project claims that there is no need for another EIR. This is absolutely false and even deceptive. The fact is that this region has changed dramatically.

Regional Changes.

There have been numerous changes that have taken place since 1992 and anyone living in this area has seen these changes take place:

1. Residential and commercial development east of the 605 Fwy has grown greatly, including Hacienda Hts, Roland Hts, Chino Hills, and City of Industry.
2. East bound traffic from Riverside and San Bernadino has at least doubled, especially during rush hour. Even on weekends traffic is at a "snail's pace" particularly near the Puente Hills Mall and near major stores, such as Fry's Electronics (Crossroads Pkwy).
3. The area near the intersection of the Pomona Fwy and 605 Fwy has been especially developed commercially within the past five years, and is currently home to Fedex and other major corporations operating large fleets of 18 wheeler trucks, all of which contribute to increased traffic and pollution. Also, there is increased traffic on Workman

Mill Rd. and Peck Rd. due to students arriving at Rio Hondo College in the mornings. These are the two primary roads that lead to the PHMRF and would surely affect the flow of traffic in and out of that facility.

PHMRF traffic volume @ maximum capacity.

The Sanitation District estimated that there would be 2,900 trips per day @ max. cap. 4,400 tons per day. Even reducing that number by 1000 per day to account for employee and other auxiliary vehicles, we can still assume almost 2,000 trips per day or over 110 trucks per hour. How can you seriously say that that many trucks would not affect our environment?

The Sanitation District also stated that when the Puente Hills landfill closes on October 31, 2013, there should be a decrease in the traffic volume related to refuse. Where do you think these trucks are going to deliver their refuse? The traffic will simply shift to the PHMRF Center, and not actually decrease. Besides, if they really believed that the current traffic volume will decrease in the near future, why is the District asking to change the operating hours as stated in the original CUP in the first place?

We believe the Sanitation Districts should reconsider this proposed amendment. There is no question in our opinion that this could potentially have an enormous impact on traffic, air quality and noise pollution in this region, and to rely on an environmental study that is over 20 years old is not being honest. We would simply ask that before you proceed, a new study of the environmental impact of this proposal be reconsidered.

Sincerely,

Henry Oga  
Grace Oga



750 Vinemead Drive  
Whittier, Ca. 90601

## **Attachment C**



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON CHAN  
Chief Engineer and General Manager

May 1, 2013

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

Dear Chair Louie and Commissioners:

**Additional Supporting Information for the Proposed Modification of the  
Puente Hills Materials Recovery Facility Conditional Use Permit 92251-(4)  
Which Will be Heard by the Regional Planning Commission on May 13, 2013**

Conditional Use Permit (CUP) No. 92251 approved August 3, 1999, established land use conditions for the Puente Hills Materials Recovery Facility (PHMRF) that is owned and operated by the Sanitation Districts. The PHMRF provides publically-owned waste diversion and transfer capacity for Los Angeles County. All materials handling at the PHMRF occurs within an enclosed building designed to contain odors and noise. The PHMRF is currently permitted as a 24-hour operation; however, Condition No. 8 of the CUP prohibits inbound and outbound shipments and employee commuting during peak morning and afternoon traffic hours. This restriction was imposed to mitigate traffic impacts of the combined operation of the PHMRF and the Puente Hills Landfill. The Puente Hills Landfill will close on October 31, 2013, and with the closure of the landfill, the traffic will be greatly reduced. Thus, Condition No. 8 is no longer appropriate since there will be no traffic impacts to mitigate.

Removal of Condition No. 8 will not result in any change to the PHMRF's capacity and the Sanitation Districts is not asking to increase capacity. Condition No. 8 impairs the facility's ability to operate efficiently, where truck shipments are logistically aligned with customer schedules and market needs, and impacts the facility's financial sustainability. The PHMRF is an important component in the county's current and long-term solid waste management system. This important piece of public infrastructure, constructed at a cost of \$71 million, provides competition to private facilities, thus serving to moderate rates for the community.

The Sanitation Districts are submitting the attached additional supporting information for the Regional Planning Commission's consideration to support your review of our appeal. The attached information also provides our reply to the comment letters received in opposition of our request. The attached documents include the purpose behind the requested CUP modification and facts and data to demonstrate why removal of the peak hour restrictions would not result in any increase in air, traffic, or noise impacts.

The Sanitation Districts request your approval of the proposed CUP modification. If you or your staff have any questions that arise during your review of this matter, please do not hesitate to contact Mr. Chris Salomon at (562) 908-4288, extension 2716.

Very truly yours,

Grace Robinson Chan



Thomas J. LeBrun  
Department Head  
Facilities Planning Department

TJL:GA:rvr

Attachments

cc: Richard J. Bruckner, Director, Department of Regional Planning  
Maral Tashjian, Regional Planner

**ADDITIONAL SUPPORTING INFORMATION**  
**REGIONAL PLANNING COMMISSION APPEAL**  
**May 13, 2013 Hearing**

Applicant: Sanitation Districts of Los Angeles County  
Project Number: 92251-(4)  
Case Number: Conditional Use Permit 92251  
Facility: Puente Hills Materials Recovery Facility  
2808 South Workman Mill Road, Whittier  
Case Planner: Ms. Maral Tashjian

## **I. PROPOSED CHANGE AND PURPOSE**

The currently approved conditional use permit (CUP) allows the Puente Hills Materials Recovery Facility (PHMRF) to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The peak hour restrictions were put in place to mitigate traffic impacts because the Puente Hills Landfill (PHLF) and the PHMRF were assumed to operate concurrently. This will no longer be the case when the PHLF closes on October 31, 2013.

The Sanitation Districts of Los Angeles County (Sanitation Districts) are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours, decreasing the vehicle count per hour.

The purpose of the CUP change is to allow the PHMRF to operate efficiently, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is already permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important component in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to operate without competitive disadvantages. Additionally, this will protect the public's investment of \$71 million to develop facilities to divert recyclable materials from disposal and be the receiving facility for the waste-by-rail system. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

## II. BACKGROUND

### 1992 Environmental Impact Report

In 1992, as the lead agency, the Sanitation Districts certified an environmental impact report (EIR) which assessed the impacts from the construction and operation of the proposed PHMRF and the continuing operation and expansion of the adjacent PHLF.

The EIR assumed that the PHLF would continue to operate at its maximum capacity of 13,200 tons of refuse per day (tpd) and that the PHMRF would operate at a maximum 4,400 tpd. The concurrent operations of the PHLF and PHMRF were estimated to generate 7,040 trips per day of trucks and employee vehicles when operating at their respective maximum capacities (see table below). The majority of the traffic (4,140 trips per day) would be generated by the continuing operation of the PHLF, whereas the PHMRF would generate 2,900 trips per day. CUPs were subsequently approved permitting the PHLF and PHMRF to accept a combined maximum of 17,600 tpd.

<b>FACILITY</b>	<b>1992 EIR TONNAGE Tons per Day</b>	<b>1992 EIR TRAFFIC Trips per Day</b>
Puente Hills Landfill	13,200	4,140
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	17,600	7,040

The traffic analysis of the concurrent operation projected a traffic distribution is shown below based on ingress and egress from the Crossroads Parkway entrance, which is used by both facilities:

<b>FREEWAY/STREET</b>	<b>PERCENT OF TOTAL TRAFFIC</b>
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

The majority of the traffic (82 percent) from the combined project (PHLF and PHMRF) would use the 60 FWY at Crossroads Parkway. Only a small percentage of the total traffic would be on the non-freeway access portion of Crossroads Parkway, near Avocado Heights.

The traffic analysis for 1992 EIR found that the combined PHLF and PHMRF traffic constituted:

- 2.73 percent of the total 1995 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 1.74 percent of the total 1995 freeway traffic on the 605 FWY south of Peck Road during morning peak hours

As required by the California Environmental Quality Act (CEQA), the EIR considered future traffic impacts. For 2013, the combined project was estimated to represent the following percentage of freeway traffic:

- 2.30 percent of the total 2013 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 1.46 percent of the total 2013 freeway traffic on the 605 FWY south of Peck Road during morning peak hours

The eastbound 60 FWY at Crossroads Parkway was not significantly impacted during the morning peak hours. The morning peak hour timeframe was considered to be the worst-case scenario given the traffic profile of the PHLF.

In an effort to mitigate the peak hour traffic and the air emissions from the combined project, the Sanitation Districts accepted the recommendation by the South Coast Air Quality Management District (SCAQMD) to limit the receipt of refuse collection vehicles, transport of recyclable materials and residuals, and employee commute traffic to off-peak hours as a mitigation measure.

#### **Conditional Use Permit for PHMRF**

On August 3, 1999, the Los Angeles County Board of Supervisors (BOS) approved CUP No. 92551-(4) and made the following findings regarding the PHMRF:

- The PHMRF will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area and will not be materially detrimental to the use, enjoyment, or valuation property of other persons located in the vicinity of the site and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- The site is adequate in size and shape to accommodate the development features prescribed in the Zoning Ordinance and otherwise required to integrate the use approval with the uses in the surrounding area.
- The site has adequate traffic access and is adequately served by other public or private facilities which it requires.

Consequently, the BOS found that the PHMRF satisfied the burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code.

#### **Addendum to 1992 Environmental Impact Report**

On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR, finding that eliminating the peak hour restrictions on the PHMRF would not be a substantial change that would require major revisions of the previous EIR, would not have a significant effect on the environment, and would not result in a substantial increase in the severity of previously identified significant effects.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions due to the reduction in traffic going to the PHLF.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

FACILITY	1992 EIR Trips per Day <sup>1</sup>	TRAFFIC	
		WITH CURRENT AVERAGE PHLF TONNAGE Trips per Day <sup>1</sup>	WITH CURRENT MAXIMUM PHLF TONNAGE Trips per Day <sup>1</sup>
Puente Hills Landfill	4,140	1,683	2,242
Puente Hills Materials Recovery Facility	2,900 <sup>2</sup>	2,900 <sup>2</sup>	2,900 <sup>2</sup>
Combined Project	7,040	4,583	5,142

Notes:

- (1) Trips are one-way trips. Two one-way trips make up one roundtrip.
- (2) Using trips per day based on PHMRF operating at its maximum permitted capacity

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the soil needed for the landfill's final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR (see Tables A and B below).

**Table A – Combined Project Tonnage**

<b>FACILITY</b>	<b>1992 EIR</b>	<b>CURRENT MAXIMUM TONNAGE</b>	<b>PROJECTED TONNAGE DURING PHLF CLOSURE</b>	<b>PROJECTED TONNAGE AFTER PHLF CLOSURE</b>
	<b>Tons per Day</b>	<b>Tons per Day</b>	<b>Tons per Day</b>	<b>Tons per Day</b>
Puente Hills Landfill	13,200	8,500	0	0
Puente Hills Materials Recovery Facility	4,400	4,400	4,400	4,400
Combined Project	17,600	12,900	4,400	4,400

**Table B – Combined Project Traffic**

<b>FACILITY</b>	<b>1992 EIR</b>	<b>CURRENT MAXIMUM TRAFFIC</b>	<b>PROJECTED TRAFFIC DURING PHLF CLOSURE</b>	<b>PROJECTED TRAFFIC AFTER PHLF CLOSURE</b>
	<b>Trips per Day</b>	<b>Trips per Day</b>	<b>Trips per Day</b>	<b>Trips per Day</b>
Puente Hills Landfill	4,140	2,242	900	80
Puente Hills Materials Recovery Facility	2,900	2,900	2,900	2,900
Combined Project	7,040	5,142	3,800	2,980

- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to the Los Angeles County Department of Public Works (LACDPW) to determine if there were any significant impacts to county roadways or local street intersections. As shown in Attachment 1, the Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

### **III. IMPORTANCE OF PHMRF TO LOS ANGELES COUNTY**

The PHMRF is an important component in the county’s solid waste management system. It is an integral part of the Sanitation Districts’ waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county.

The county’s waste management system, which has taken 60 years to develop, depends on a balance of privately and publicly owned and operated facilities serving the needs of county residents. The PHMRF

receives waste from both private haulers and the general public. Other MRFs in the area typically only receive waste from waste collection companies and are not necessarily open to the general public. The closest MRFs which accept waste from the general public are Grand Central Recycling and Transfer Station, 7 miles from the PHMRF, and the Norwalk Transfer Station, 14 miles from the PHMRF. As a publicly owned and operated facility, the PHMRF also helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

#### **IV. PHMRF LOCATION**

The PHMRF is located on a 25-acre parcel on 2808 Workman Mill Road in Whittier. Attachment 2 contains exhibits showing an aerial view, street views surrounding the facility, line of sight views from the nearest protester to the PHMRF (approximately 1,300 feet away on Gala Street), and a vicinity map.

##### **Surrounding Land Use Designations**

The PHMRF parcel is in the A-2-5 zone (Heavy Agricultural – five-acre minimum lot size) of the Workman Mill Zoned District. The City of Industry borders the PHMRF along the north boundary, where there are only two land use designations in its general plan: Industrial and Commercial. Immediately to the south of the PHMRF is the PHLF. The other major surrounding land uses near the PHMRF are the Rio Hondo College, Rose Hills Memorial Park, FedEx, and open space in Puente Hills. The community of Avocado Heights is approximately 2/3 of a mile away in a straight line with numerous commercial buildings, restaurants, and the 60 FWY in between.

##### **Freeway Accessibility**

The entrance to the PHMRF is located adjacent to the 60 FWY on 13130 Crossroads Parkway South, which is the same entrance for the PHLF. The 60 FWY east onramp is approximately 400 feet from the PHMRF entrance. The 60 FWY west onramp is approximately 2,000 feet from the PHMRF entrance, just over the 60 FWY overpass on a Crossroads Parkway. The 605 FWY north and south can be accessed using the 60 FWY west onramp. Additionally, the 605 FWY north can be accessed on Pellisier Place Road.

##### **Non-Public Road Between Crossroads Parkway Entrance and the PHMRF Building**

The internal roads between the PHMRF scale house and the Crossroads Parkway entrance provides for more than 3/4 mile of queuing capacity, so there is no potential for backup onto city streets.

#### **V. ISSUES RAISED BY PROTEST LETTERS**

Fifteen protest letters were received by the Department of Regional Planning during the public comment period in February 2013 prior to the first hearing on the proposed modification. Attachment 3 contains our detailed responses to each protest letter. The following are a summary of the issues raised and our responses:

##### **FACILITY CAPACITY ISSUES**

- **Concerns include expansion of facility capacity and operation of an unnecessary public facility.**

The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours, decreasing the vehicle count per hour.

The PHMRF is an important component in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

### **AIR QUALITY ISSUES**

- **Concerns include increased air pollution from traffic and operations, including odors and dust.**

In 1992, as the lead agency, the Sanitation Districts certified an environmental impact report (EIR) which assessed the impacts from the construction and operation of the proposed PHMRF and the continuing operation and expansion of the adjacent PHLF. On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR. The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

Additionally, The PHMRF is enclosed with odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system will remain in place.

**TRAFFIC ISSUES**

- **Concerns include increased traffic causing additional congestion on freeways and surface streets that would require additional quantitative analysis.**

**TRAFFIC FROM THE APPROVED PROJECT HAS DECREASED SINCE 1992 AND WILL CONTINUE TO DECLINE**

The 1992 EIR assumed that the PHLF would continue to operate at its maximum capacity of 13,200 tons of refuse per day (tpd) and that the PHMRF would operate at a maximum 4,400 tpd. CUPs were subsequently approved permitting the PHLF and PHMRF to accept a combined maximum of 17,600 tpd. Employee and truck traffic entering the PHLF portion of the project has dropped significantly since the 1992 EIR due to the economic downturn (see Table 1 below). PHLF is expected to remain at this lower operating level until it closes in the next few months. If the PHLF continued to operate at 8,500 tpd and the PHMRF were operated at its maximum tonnage of 4,400 tpd, the combined tonnage of the concurrent operation would be less than the maximum tonnage for the PHLF portion of the project analyzed in the 1992 EIR.

**Table 1 – Combined Project Tonnage**

<b>FACILITY</b>	<b>1992 EIR</b>	<b>CURRENT MAXIMUM TONNAGE</b>	<b>PROJECTED TONNAGE DURING PHLF CLOSURE</b>	<b>PROJECTED TONNAGE DURING PHLF POSTCLOSURE</b>
	<b>Tons per Day</b>	<b>Tons per Day</b>	<b>Tons per Day</b>	<b>Tons per Day</b>
Puente Hills Landfill	13,200	8,500	0	0
Puente Hills Materials Recovery Facility	4,400	4,400	4,400	4,400
Combined Project	17,600	12,900	4,400	4,400

The 1992 EIR estimated that the concurrent operations of the PHLF and PHMRF generated 7,040 trips per day of trucks and employees vehicles when operating at their respective maximum capacities. The majority of the traffic (4,140 trips per day) would be generated by the continuing operation of the PHLF, whereas the PHMRF would generate 2,900 trips per day. The traffic from the combined PHLF and PHMRF project is less today than what was analyzed in 1992. The traffic from the combined project will continue to decrease after the PHLF closes on October 31, 2013, even with the removal of the peak hour restrictions for the PHMRF (see Table 2 below).

**Table 2 – Combined Project Traffic**

<b>FACILITY</b>	<b>1992 EIR</b>	<b>CURRENT MAXIMUM TRAFFIC</b>	<b>PROJECTED TRAFFIC DURING PHLF CLOSURE</b>	<b>PROJECTED TRAFFIC DURING PHLF POSTCLOSURE</b>
	<b>Trips per Day</b>	<b>Trips per Day</b>	<b>Trips per Day</b>	<b>Trips per Day</b>
Puente Hills Landfill	4,140	2,242	900	80
Puente Hills Materials Recovery Facility	2,900	2,900	2,900	2,900
Combined Project	7,040	5,142	3,800	2,980

TRAFFIC IMPACTS RESULTING FROM THE CUP CHANGE ARE LESS THAN SIGNIFICANT

The projected PHMRF traffic with the peak hour restrictions removed was submitted to the Los Angeles County Department of Public Works (LACDPW) to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

NO ADDITIONAL TRAFFIC ANALYSIS IS REQUIRED

The 1992 EIR evaluated known and reasonably foreseeable impacts from traffic. Additional analyses were conducted in preparation for the 1995 Subsequent EIR and for the Puente Hills Intermodal Facility (PHIMF) EIR. In each case, the Board of Directors of Sanitation District No. 2 of Los Angeles County and the City Council of the City of Industry made findings and approved the project. Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county’s roadways or local intersections. No additional traffic study is necessary.

**NOISE ISSUES**

**- Concerns include increased noise from traffic and operations within the facility.**

The initial study for the Addendum to the 1992 EIR for the combined PHLF and PHMRF project determined that there would be no new noise impacts associated with the removal of the peak hour restrictions at the PHMRF. There are several reasons for this assessment:

- The 1992 EIR estimated 7,040 one-way trips per day would occur from the combined PHLF and PHMRF project. Today, approximately 5,142 trips per day (or less) would occur from the combined project even with the removal of the peak hour restrictions. Further reductions in traffic would occur after the PHLF closes on October 31, 2013. These reductions in truck and employee commute trips would also result in proportionate reductions in noise due to transport.
- The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and

employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

- The PHMRF contains automated doors which close immediately after trucks enter the building. While this feature is primarily designed for odor control, it also helps prevent noise from migrating outside the building. This design feature will remain in place. Additionally, the loading of MRF residuals into outbound containers occurs at the back of the building, which faces the heavily vegetated hillside of the PHLF.
- The PHMRF is surrounded by commercial buildings and the PHLF landfill. The nearest resident is over 1/4 mile away. The 60 FWY, office buildings, restaurants, and businesses with significant distribution or transport activities are closer to residents than the PHMRF.

## VI. CUP CHANGE MEETS THE NECESSARY FINDINGS

As indicated in the table below, the requested CUP change to remove the peak hour restrictions meets the necessary findings under Section 22.56.1650 (Appeal Procedures). Therefore, the Sanitation Districts request that the Regional Planning Commission approve the CUP change.

MEETS FINDING?	FINDING REQUIRED FOR APPROVING CUP CHANGE	REASONS FOR MEETING FINDING
YES	<p><b>Burden of Proof - Section 22.56.1650(A)(1) of Zoning Code, which references Sections 22.56.040 (A)-(C).</b></p> <p>Section 22.56.040(A) requires that the CUP modification not:</p> <ol style="list-style-type: none"> <li>1. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or</li> <li>2. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or</li> <li>3. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.</li> </ol>	<p><b>Section 22.56.040(A):</b></p> <p>The removal of the peak hour restrictions would not change the permitted capacity of or the associated total truck traffic from the PHMRF. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours. Consequently, there would be no new traffic, air, or noise impacts resulting from the elimination of the peak hour restrictions.</p>
	<p>Section 22.56.040(B) requires that the facility meet certain size adequacy requirements.</p>	<p><b>Section 22.56.040(B):</b></p> <p>The PHMRF is located on 25 acres and consists of a processing building, administrative offices, scales, parking, and maintenance areas. The processing building is approximately 215,000 square feet and has a state-of-the-art odor control system for containing and treating all refuse handling odors. The internal roads between the PHMRF scale house and the Crossroads Parkway entrance provides more than 3/4 mile of queuing capacity, so there is no potential for backup of traffic onto city streets. Consequently, PHMRF meets the size adequacy requirements of Section 22.56.040(B) of the Zoning Code.</p>
	<p>Section 22.56.040(C) requires that the site be adequately served by highways or streets.</p>	<p><b>Section 22.56.040(C):</b></p> <p>The PHMRF is located adjacent to the 60 FWY. The trucks entering and exiting the Crossroads Parkway entrance to PHMRF have direct access to the 60 FWY East onramp and non-residential access to the 60 FWY West onramp just over the 60 FWY overpass. Consequently, PHMRF meets the requirements of Section 22.56.040(C) of the Zoning Code.</p>
YES	<p><b>Section 22.56.1650(A)(2) of Zoning Code:</b></p> <p>The modified CUP will not materially deviate from the terms and conditions imposed in the previously approved CUP.</p>	<p>The requested modification does not materially deviate from the terms and conditions previously imposed since neither the tonnage received or the quantity of traffic will increase as a result of the modification, thereby meeting the requirements of Section 22.56.1650(A)(2) of the Zoning Code.</p>
YES	<p><b>Section 22.56.1650(A)(3) of Zoning Code:</b></p> <p>That the approval of the application is necessary to allow the reasonable operation and use granted in the previously</p>	<p>The purpose of the CUP change is to allow the PHMRF to operate efficiently, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery</p>

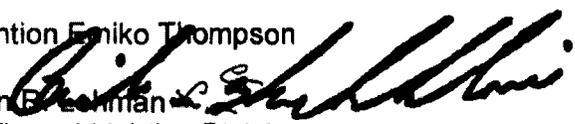
	approved CUP.	inside the building is permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable. The removal of the peak hour restrictions would allow the PHMRF to be financially sustainable and to operate without competitive disadvantages.
--	---------------	---

**ATTACHMENT 1**  
**Letter from Los Angeles County Department of Public Works**

June 20, 2012

TO: Pat Proano  
Environmental Programs Division

Attention Eniko Thompson

FROM: Dean B. Hoffman   
Traffic and Lighting Division

**PUENTE HILLS MATERIALS RECOVERY FACILITY  
PROPOSED EXPANDED HOURS (FEBRUARY 2012)**

As requested, we have reviewed the proposal to expand the hours for receipt of waste at the existing Puente Hills Materials Recovery Facility. The project site is located at 2808 Workman Mill Road, which is adjacent to the Puente Hills Landfill in the unincorporated area.

Based on the review of the project's original environmental documents and submitted information on truck trips, the proposed expansion to the hours of operation is not expected to have a significant impact to the County roadways and intersections in the area. Consequently, the project is not required to submit a traffic impact analysis for review and approval.

If you have any questions regarding the review of this document, please contact Suen Fei Lau of Traffic Studies Section at Extension 4820.

SFL:sm

P:\pub\WPF\FILES\LAND DEVELOPMENT REVIEW\Fei\EIR 12-0093 Puente Hills MRF Hours Extension.doc

**ATTACHMENT 2**  
**Exhibits**

A large, modern industrial building with green and beige panels and a sign in the foreground. The building has multiple windows with green frames and a stone wall in front. The sign is white with green accents and is set on a grassy area. The sky is blue with light clouds.

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

**PUENTE HILLS**  
MATERIALS RECOVERY FACILITY

2808 Workman Mill Road  
Whittier, CA 90601

# EXHIBIT 1

## Aerial View of PHMRF and Vicinity



Avocado Heights

PUENTE HILLS LANDFILL

PHMRF/PHLF Entrance

Non-Public Road from Entrance to PHMRF

60 FWY

Crossroads Pkwy

Airgas

PHMRF

Haralambos Beverage

Topocean

Cintas

Workman Mill Rd

WASTE-BY-RAIL FACILITY (under construction)

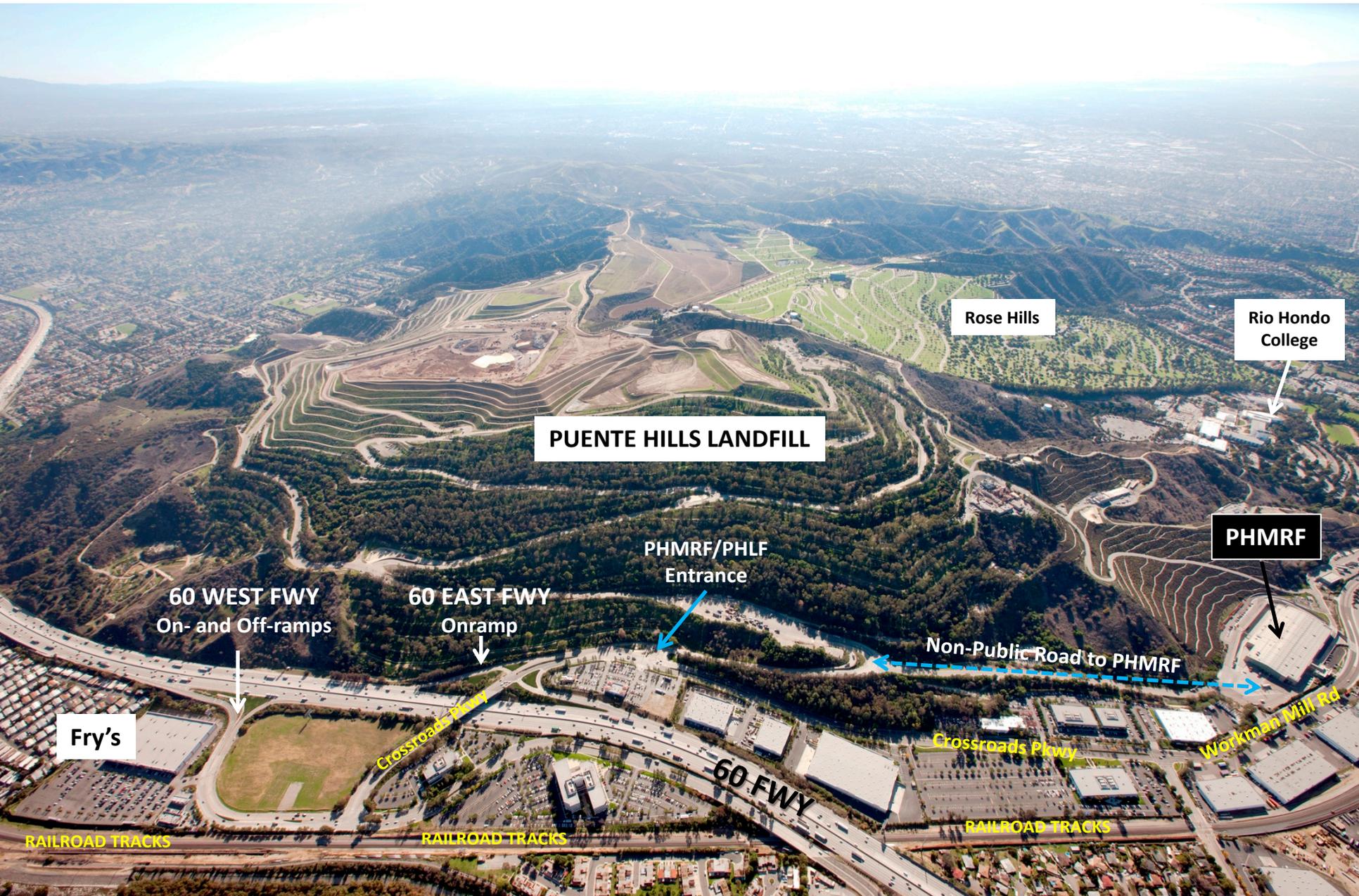
FedEx

605 FWY

Pellissier Place

# EXHIBIT 2

## Aerial View of PHMRF/PHLF Entrance and Vicinity



**PUENTE HILLS LANDFILL**

**Rose Hills**

**Rio Hondo College**

**PHMRF**

**PHMRF/PHLF Entrance**

**60 WEST FWY**  
On- and Off-ramps

**60 EAST FWY**  
Onramp

**Non-Public Road to PHMRF**

**Fry's**

**Crossroads Pkwy**

**Crossroads Pkwy**

**Workman Mill Rd**

**60 FWY**

**RAILROAD TRACKS**

**RAILROAD TRACKS**

**RAILROAD TRACKS**

# EXHIBIT 3.1

## LINE-OF-SITE VIEWS

### Part 1: Aerial Showing Line-of-Sight Locations



## EXHIBIT 3.2 LINE-OF-SITE VIEWS

### Part 3: Views from Closest Community to PHMRF (Over 1/4 Mile Away)



#### VIEW 3A

View looking towards PHMRF from the corner of Workman Mill Road and Cambray Drive. Photo shows railroad tracks and an industrial building. The PHMRF is not visible.



#### VIEW 3B

View looking towards PHLF/PHMRF from Gala Street. Photo shows PHLF in the distance. The PHMRF is not visible.

**ATTACHMENT 3**  
**Detail Responses to Protest Letters**

## **Protest Letters:**

- 1) Teresa Aguilar, dated February 12, 2013
- 2) Richard & Marilyn Kamimura, dated February 11, 2013
- 3) Victoria Anderson, dated February 11, 2013
- 4) Clean Air Coalition of North Whittier and Avocado Heights, dated January 28, 2013
- 5) Don C. Moss, dated February 4, 2013
- 6) Marilyn Kamimura, dated January 29, 2013
- 7) Richard Kamimura, dated January 29, 2013
- 8) Victoria Anderson, dated January 30, 2013
- 9) Nellie Rivas, dated January 30, 2013
- 10) Henry & Grace Oga, not dated (received February 5, 2013)
- 11) Albert & Margaret Porras, dated February 8, 2013
- 12) Concerned Residents of Unincorporated North Whittier, dated February 11, 2013
- 13) Concerned Residents of Unincorporated North Whittier, dated February 11, 2013
- 14) Armando & Rachael Cervera, dated February 7, 2013
- 15) Margaret Caster, dated February 7, 2013

COMMENT LETTER NO. 1

February 12, 2013

Department of Regional Planning  
Attention: Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**PROTEST LETTER - PERMIT #92-251 PHMRF CUP MODIFICATION 8**

Dear Director of Planning:

I am against modification of CUP 92-251 Condition 8.

As a longtime resident that has already endured excessive noise from trains I question the initial study attached to the Notice of Determination that the noise from a 24-hour facility 6 days a week will have no impact. The noise WILL have a negative impact on this community. The movement of trucks as well as trucks dropping loads, unloading and loading will cause the trucks to emit more noise for the following reasons:

- The streets in the area are lined with buildings influencing traffic noise.
- The buildings will trap noise and increase its effects.

The residents in close vicinity will have to take the brunt of most of the excessive noise for 24 hours.

We already have to endure the noise emitted by trains, which include loud continuous whistles and horns in the early morning and late evening. This has caused stress, high blood pressure and sleep loss to me and my neighbors.

The Sanitation Districts do not have unlimited rights to broadcast noise as they please by producing noise pollution and acting like a bully in a school yard. They disregard the rights of others and claim for themselves rights that are not theirs.

Sincerely,



Teresa M. Aguilar  
13343 E. Loumont St.  
Whittier, Ca. 90601  
Ph: (626) 330-2898  
E-mail: tajalauren@roadrunner.com

1A  
1B

①

### Clean Air Coalition of North Whittier and Avocado Heights

COMMENT LETTER NO. 2

Richard H. Kamimura  
and Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca. 90601  
626-3309365 Fax 626-3309365

February 11, 2013

Department of Regional Planning  
County of Los Angeles  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, CA. 90012

Re: Permit # 92-251 PHMRF CUP modification 8.

Dear Director of Planning:

As longtime residents that have lived with the impact of a landfill in our backyard and another MURF in close vicinity, we are against this modification.

2A

In 1999 when the PHMRF received its restricted hours, the closure of the landfill of October 2013 reducing 13,200 tons per day of trash was already part of the scenario.

2B

By modifying condition 8. to 24 hours 6 days a week there will now be a reversal. As an example, a carpool lane moves more traffic through easier, more hours makes it easier to move more garbage trucks through.

2C

The fact that the Sanitation Districts of L.A. County does not want to follow the scenario of less we can only resolve this process of modification is a guise for EXPANSION.

2D

By moving in this direction of increasing hours you will be approving the reckless disregard of the health, welfare and quality of life of taxpaying residents that are expected to endure these facilities forever.

2E

We have had enough.

Sincerely,



Richard H. Kamimura



Marilyn Kamimura

2

Victoria Anderson  
1039 Bunbury Dr.  
Whittier CA 90601

COMMENT LETTER NO. 3

February 11, 2013

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012  
c/o Director of Planning

**RE: against modification of CUP 92251 condition 8**

Dear Director of Planning:

In reference to statements:

Section III AIR QUALITY (see page 7, ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PUENTE HILLS MATERIALS RECOVERY FACILITY JANUARY 2013)

\*Explanation

a - d No new impacts

"The PHMRF FEIR analyzed air quality impacts from the PHLF and the PHMRF operating concurrently at their maximum permitted capacity of 17,600 tons of refuse per day. These impacts mostly arose from air emissions from vehicles travelling to and from the PHLF and the PHMRF. The Board in certifying the PHMRF FEIR determined that remaining air quality impacts after mitigation due to the operation of the PHMRF would be significant but unavoidable, that diversion of the waste stream elsewhere would result in higher air quality impacts, and that there is no feasible way to lessen or avoid any remaining effects. The Board balanced the benefits of the PHMRF project against unavoidable environmental risks and determined that the adverse environmental effects are considered acceptable."

"The proposed elimination of hour restrictions at the PHMRF would allow refuse haulers in close proximity to the PHMRF, but previously unable to practically use the facility due to the hour restrictions, to now use the facility. This would provide for overall more efficient countywide transport of refuse to transfer/processing facilities, reducing average haul distance, traffic impacts, and air emissions."

3A

At present, there are in close proximity multiple MRFs with flexible hours. One is in Azusa, two in the City of Industry, and another is being built in Irwindale. A private hauler will go to the nearest, most convenient and cost efficient location. The Sanitation Districts are going on an assumption that a hauler will use their facility. On an assumption you are bringing more truck traffic to a location that is already a 'HOT SPOT' (impacted with traffic emissions, foul air, dust and noise).

A feasible way to lessen or avoid any remaining effects is not to increase hours. Let the haulers go elsewhere.

**"The Board balanced the benefits of the PHMRF project against unavoidable environmental risks and determined that the adverse environmental effects are considered acceptable."**

3B

Considered acceptable to whom???? NOT US.

Yours truly,

Vickie Anderson

**Clean Air Coalition of  
North Whittier and Avocado Heights**  
843 Caraway Drive, Whittier, Ca 90601 (626) 330-9365

January 28, 2013

COMMENT LETTER NO. 4

Department of Regional Planning  
Attention: Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012



**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Director of Planning:

We represent the residents (sensitive receptors) of the communities of Gladstone, Whittier Woods, Avocado Heights to include North Whittier and Bassett.

4A

In reference to the DEIR prepared for the PHIMF located at 2500 Pellissier Place a project connected to the PHMRF, the DEIR shows a predominately northern wind pattern. Predominately northerly winds travel over our communities. We will be impacted by increased foul air, dust and diesel pollution from approximately 1,700 diesel trucks daily, moving 4,400 tons of garbage if this modification is passed.

4B

**A. ISSUE OF FOUL AIR, DUST AND DIESEL POLLUTION**

Disposing of garbage into the Puente Hills Landfill with diesel trucks at a higher elevation keeps foul air, dust and diesel pollution elevated, allowing greater dispersion and dilution. The PHMRF is located at the base of the landfill with garbage being trucked into a building that will never be empty. Both situations have reduced dispersion and dilution of pollutants. This foul concentration and health hazard will eventually disperse in a northerly direction. We now have this burden forever.

4C

**REQUEST:**

1. Monitoring of harmful emissions and dust by SCAQMD within the perimeter of the location at maximum capacity.
2. The emission monitoring results compared with the year baseline taken in 2008 by SCAQMD located on 2190 Pellissier Place.
3. A two-year report of odor complaints recorded by Sanitation Districts of L.A. County and SCAQMD of their Dart facility in Downey. Are they a "good neighbor"?
4. Report on how the Sanitation Districts have complied with SCAQMD Rule 410 (Odors from Transfer Stations and Material Recovery Facilities and Rule 1193 (Clean on-Road Residential and Commercial Refuse Collection Vehicles. Both rules passed after PHMRF received their CUP.

4D

4E

4F

4G

**B. ISSUE OF SIGNIFICANT IMPACT TO COUNTY ROADWAYS AND INTERSECTION INTO OUR COMMUNITY ROADWAYS**

The 1992 DEIR prepared for the PHMRF is outdated and incomplete in reference to traffic impact analysis to include Workman Mill Road, Peck Road, Pellissier Place, Crossroads

4H

Parkway South and North, the I-605 interchange at Peck Road and the SR-60 interchange at Crossroads Parkway.

1. The CUP for the PHMRF was passed in 1999 and the CUP for PHIMF in 2008. Each traffic impact analysis was done separately. To accurately assess traffic impact to the major arteries (freeways) and local roadways the projects must be connected.
2. The DEIR #93121114, Volume II Technical Appendices Impact Analysis uses the years of 1996 to 2005. Since then the following changes have occurred in the area:
  - Truck traffic from FedEx, UPS and Gateway Pointe Industrial Park off Workman Mill Road.
  - The carpool lane off the 60 Freeway, eighty five percent of the PHMRF traffic exits Crossroads Parkway onto the 60 Freeway. A proposition 65 environmental impact warning was placed on that carpool project. Why? Cars entering the carpool lane may move more easily, but it makes room for more vehicles and trucks to use the freeway.

**REQUEST:**  
Updated Traffic Impact Analysis

**C. ISSUE OF STATEMENT SANITATION DISTRICT “IMPROVING VIABILITY OF THE PHMRF TO COMPETE WITH OTHER PRIVATELY-OWNED FACILITIES**  
Directive of the Sanitation Districts of L.A. County is to “manage the counties waste. It is not to compete with the private sector. The private sector has a choice in how they manage their waste collection and meet their 50% recycling goals.

**REQUEST:**  
Viability to compete means financial gain. The 78 cities and unincorporated county’s gain. We are a small community of people who were here before the Sanitation Districts of L.A. County grew to take one third of L.A.’s garbage and bring it to our backyards. We have sacrificed enough. Keep the Sanitation Districts of L.A. County PHMRF at its present restriction. Let it be a shared sacrifice.

Sincerely,

  
Marilyn Kanimura et al.  
Chairperson

  
Richard Kamimura  
Co-Chairperson

cc: Gloria Molina, Los Angeles County Supervisor, 1<sup>st</sup> District  
Assemblymember Calderon, District 57  
Attach: Members

Clean Air Coalition of  
North Whittier and Avocado Heights  
Members

---

Luis F. Marchén  
Luis F. Marchin

Margaret A. Caster  
Margaret A. Caster

Teresa Aguilar  
Teresa Aguilar

Hank Oga  
Hank Oga  
Raul Santos  
Raul Santos

Nellie Rivas  
Nellie Rivas

Belia Avila  
Belia Avila

Joan M. Rozzi  
Joan Rozzi

Vickie Anderson  
Vickie Anderson  
itsvic@roadrunner.com

Arline Hernandez  
Arline Hernandez

Rachael O. Cervera  
Rachael O. Cervera

Sara Santos  
Sara Santos

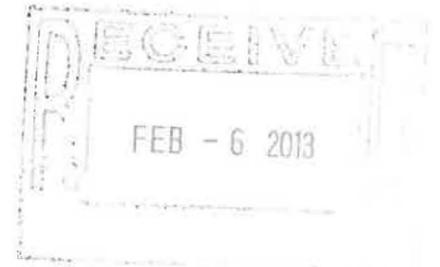
Armida Hernandez  
Armida Hernandez

Nina Najera

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

February 4, 2013

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



Certified Mail: 7006 2150 0001 6891 8309

Re: CUP 92251, Modification

Dear Director of Planning:

Summary:

I oppose the request for modification of CUP 92251. Removal of the peak traffic period operating restrictions from the subject CUP will increase all types of traffic congestion on SR-60 and I-605 in the vicinity of the operation. These are two critical transportation routes for the Los Angeles basin. The intersection of these freeways, immediately adjacent to the subject site, is currently highly congested in spite of recent widening projects. Even though current overall traffic volumes are substantially reduced because of the major economic downturn our area and the nation is experiencing, traffic on these routes is very slow in all directions during peak traffic periods even with all lanes open. Accidents along these routes bring traffic to a stop and go condition for the entire peak travel period.

5A

5B

Increased freeway congestion automatically increases surface route congestion in the vicinity of the freeways. The unique geography of the area affected by the CUP leaves only one through east / west surface route, Valley Blvd., and one through north / south surface route, Workman Mill Rd. / Puente Ave., to relieve freeway congestion in the immediate area of the project. This situation creates major congestion on the surface routes. That major surface route congestion causes traffic safety and quality of life issues for the local residential area of Avocado Heights as overflow traffic short cuts through on the residential streets.

5C

The original EIR on which this modification request relies was prepared in the early 1990's. The original EIR traffic study lacked appropriate scope for the true traffic impacts on the area. The study was narrowly focused around the subject operation's street address and failed to review the unique geography of the area and the added traffic impact on the residential area of Avocado Heights. The original EIR failed to adequately discuss the cumulative impacts within the project area. Assumptions advanced by the original EIR are no longer valid. Potential projects for the area which will increase traffic congestion are not discussed.

5D

The EIR Addendum presented for this modification request claims no major changes to the information advanced in the original EIR of the 1990's which is grossly incorrect. The Sanitation District claims in this modification request that cessation of rubbish intake at the adjacent Puente Hills Landfill will offset the traffic impacts created by the removal of restrictions. However, when all the available evidence is put together, it is clear that negative traffic impacts will increase over time. The traffic issues, health concerns tied to traffic related pollution, cumulative impacts of operations in the area and potential future projects for the area must be studied for the entire EIR package to be valid. The impacts of all the Sanitation District operations in the area and the additional impact of other development in the area was discussed in detail by this writer and others within the community with Charles E. Boehmke, Department Head, Solid Waste Management Department, several months before the EIR Addendum was prepared but no mention of those issues was included for consideration.

5E

5F

In conclusion, this CUP modification must be denied because the EIR documents are insufficient and incorrect. If the CUP modification is reviewed on its merits, it must be denied because of the major negative impacts it will have on the daily commuter and commercial traffic moving through the area which includes major negative impact on the surrounding residential areas. Those negative traffic impacts cannot be mitigated. If the Department of Regional Planning decides to approve this request, an additional condition must be placed on the operation which requires a \$2 / ton (two dollars per ton) tipping fee be collected on all input to the facility. This tipping fee is to go directly to a community benefit fund for the purpose of infrastructure upgrades, safety, health, education and beautification improvements within the local residential communities most directly affected by the traffic impacts of the operation. Those communities are identified as Avocado Heights, Bassett, North Whittier, Whittier Woods, Gladstone / Cambray and Pellissier Village. The boundary of those areas is Valley Blvd. on the north, 6<sup>th</sup> Avenue on the east, Union Pacific Railroad mainline on the south and San Gabriel River / Peck Rd. on the west.

5G

5H

Discussion:

Geography. The Puente Hills to the south of the project site and the San Gabriel River complex to the west control the transportation patterns into the area surrounding the project site. Because of these geographic features there is only one main east / west surface reliever for SR-60 in the area which is Valley Blvd. and one main north / south reliever for I-605 on the east side of the river complex which is Workman Mill Rd. / Puente Ave. Because of the river complex and the development of the areas west of the river complex, the effectiveness of Valley Blvd. as a reliever begins to wane west of I-605 so large volumes of traffic reenter or leave the freeway system at the intersection of Valley Blvd. and I-605.

5I

5I

This causes greater traffic congestion on Valley Blvd. in the area of Avocado Heights / Bassett.

Traffic Congestion. SR-60 and I-605, immediately adjacent to the project site are the primary feeder routes for commercial and commuter traffic into the Puente Hills Material Recovery Facility, MRF. Both these freeways are major routes for local as well as national traffic into and out of the Los Angeles basin. Both routes have been widened to the extent possible but traffic on these routes still slows to a crawl during peak traffic periods even though traffic volume on these freeways is at an all time low because of the local and national economic downturn.

The substantial traffic congestion on these two freeways causes high traffic volume and major congestion on the limited surface routes available in the vicinity of the MRF. Traffic short cutting past the major back up on Valley Blvd. east of I-605 uses the east / west residential streets of Avocado Heights to speed up their commute. Lomitas Avenue, Don Julian Road and Proctor Avenue are jammed with short cut traffic during the peak traffic periods. The traffic is often so heavy that local residents have a difficult time exiting their own driveways during peak traffic periods. The high volume of traffic and high speed, unsafe driving through the area creates major safety issues for the school buses, school children, pedestrians, bicyclists, skate boarders and equestrians who live in the area and must use the residential streets. That high volume of traffic substantially increases the exhaust pollution which the local residents must breathe. Surface traffic short cutting through the residential area of Avocado Heights will increase in the near future as the Alameda Corridor East railroad undercrossing is constructed at the intersection of Valley Blvd. and Workman Mill Rd. / Puente Ave. This project's design creates an extra bottle neck for traffic transitioning from east / west Valley Blvd. to north / south Workman Mill Rd. / Puente Ave. in the form of a by-pass road from Valley Blvd. to Workman Mill Rd. with two light controlled intersections within a few hundred feet of each other. Traffic attempting this transition will be backed up for miles.

5J

Normal economic growth in the areas surrounding the MRF will increase commuter and commercial traffic on the freeways and the local surface streets as the economy recovers. The surrounding area is largely commercial / industrial property within the City of Industry which will draw large volumes of traffic as the economy strengthens.

Cumulative Impacts. The Sanitation District claims that all traffic to the Puente Hills Landfill will cease upon its closure in October of 2013. However, cessation of rubbish intake will not eliminate commercial vehicle activity at the landfill site. The landfill closure process will require years to perform. During the closure process, development of a county park will begin and continue for a long period of time because of the closure process and the complexity of the site. Later, the

5K

site will be accessed by county residents for recreation. The Puente Hills Landfill site will never stop drawing traffic.

5K

The Puente Hills Intermodal Facility, IMF, is under construction immediately adjacent to the MRF. All waste by rail container traffic will access the IMF through the MRF property. The IMF operation has no peak traffic period restrictions.

Operation of the IMF will require a container maintenance and storage facility. No mention of that critical aspect of a container based operation is made in either of the EIR's of the IMF or the MRF. However, that maintenance function must be considered when evaluating cumulative impacts of the operation on the local area. It appears that the Sanitation District may be planning to incorporate a container maintenance facility with their existing vehicle maintenance facility on the MRF grounds by expanding the foot print of the MRF facility in the future. A substantial volume of truck traffic will access that container care facility causing further traffic congestion for the area.

5L

MRF operational claims with respect to supplying the waste to rail operation are inaccurate. Assumptions have been advanced that when in full operation, the MRF will supply full containers for one 4000 ton train per day out of the IMF and outside loads will supply the second 4000 ton train per day. However, the MRF intake limitation is 4400 tons per day. To supply the one train, the MRF would be recovering less than ten percent per day. Since their recovery percentage is most likely higher, the volume of outside truck loads supplying the IMF operation would increase to keep the trains loaded. This would increase the number of truckloads on the freeways and surface streets beyond the maximum amount currently claimed by the EIR's. Increased truck traffic will increase traffic congestion.

The San Gabriel Valley Council of Governments has proposed an electric truck roadway to run parallel to SR-60. That electric truck roadway will begin in the general area of the MRF operation adjacent to Crossroads Parkway. That special operation would require access to be constructed from the existing freeways. Those accesses will undoubtedly cause changes to freeway and surface streets which will affect traffic congestion.

5M

Ability to Compete. During conversations with community members, Mr. Boehmke made the statement that removal of the peak traffic period restrictions was necessary so the Puente Hills MRF could be competitive with other MRF's. If this MRF operation is uncompetitive, it should be shut down with the tax savings returned to the residents of Los Angeles County. Government should provide services which private industry cannot. Since there are several private industry MRF's currently operating in the general area and more in the process of being

5N

built, the San Gabriel Valley does not need a separate government operated MRF to handle its rubbish and recycling needs. Further, this MRF is not critical to the operation of the Intermodal Facility and therefore could be shut down with no negative effect on the long term rubbish transportation plan of L.A. County.

5N

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Don C. Moss".

Don C. Moss  
Avocado Heights Community Advocate

c: Supervisor Gloria Molina

**Clean Air Coalition of  
North Whittier and Avocado Heights**

COMMENT LETTER NO. 6

Marilyn Kamimura  
843 Caraway Drive  
Whittier, Ca 90601  
(626) 330-9365 Fax (626) 330-9365



January 29, 2013

Department of Regional Planning, County of Los Angeles  
c/o Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, Ca 90012

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8.**

Dear Director of Planning:

As a resident of unincorporated North Whittier for 40 years and actively serving my community for over 20 years, I am against the modification of Condition 8.

6A

In 1992 when the Sanitation Districts of L.A. County proposed the development of the PHMRF until its final permitting process in 1999, our community was oblivious. I was rudely notified of its coming when I saw it being constructed in the early 2000's.

6B

I question the SanDistricts notification process. It came through too quietly. Proper notification to the communities of Gladstone, Whittier Woods, Avocado Heights to include unincorporated North Whittier and Bassett equal to the magnitude of the project and its environmental impacts was imperative.

6C

Quote "The Addendum concluded...would not result in any increased or additional environmental impacts beyond those which were analyzed in the EIR...that supplement environmental analysis was not required". We deserve to know its environmental impacts analyzed in the EIR and the modification change to Item 8. and its added impacts this time. We deserve a public hearing.

6D

Even for this modification proposal, I made a request to the Department of Regional Planning to extend the distance of formal notification, for pollution travels farther than 500 feet, and was denied. I was told it was up to the residents to put themselves on the notification list. A group of us made an effort. This notification process must not go through quietly.

6E

Sincerely,

Marilyn Kamimura

Clean Air Coalition of  
North Whittier and Avocado Heights

COMMENT LETTER NO. 7

Richard H. Kamimura  
843 Caraway Drive  
Whittier, Ca. 90601  
626-3309365 Fax 626-3309365

January 29, 2013

Department of Regional Planning, County of L.A.  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Director of planning:

As a resident of unincorporated North Whittier for 40 years and being negatively impacted by a Material Recovery Facility in our area, I am against the modification of condition 8.

7A

A supplemental environmental analysis is necessary for the following reasons.

7B

1-In the DEIR #91129070 page 4.8-19 Air Quality, Mitigation measures-Mobile Sources"incorporated into the proposed project to reduce emissions from mobile sources and are recommended by the SCAQMD", item one is scheduling during off peak hours and reduce peak hours of travel.

7C

\*You are now making a change by removing a mitigation. By removing a mitigation an environmental addendum is necessary.

2-In the DEIR # 9312114 Volume II Technical Appendices page 44 under 4.1 Truck generation, it states" if public roads are used for the transfer of the residual waste from the PHMRF to the intermodal facility---, the outloading of the residual waste would not occur during the peak morning or afternoon traffic hours of 6:00am to 9:00 am and 4:00pm and 7:00pm respectively. The PHIMF is presently not operating thus the outloading will be 100% by trucks using public roads.

7D

\*The PHIMF not presenting operating opens up a review of truck generation on public roads during peak hours.

Sincerely,



Richard H. Kamimura

# Clean Air Coalition of North Whittier and Avocado Heights

COMMENT LETTER NO. 8

Victoria Anderson  
1039 Bunbury Dr.  
Whittier CA 90601

January 30, 2013

Department of Regional Planning  
County of Los Angeles  
320 W. Temple Street  
Room 1348  
Los Angeles, CA 90012  
c/o Director of planning

**RE: PERMIT #92-251 PHMRF CUP MODIFICATION 8**

Dear Director of Planning:

I am a resident of the community of North Whittier. I understand you are requesting a **change** to Condition 8 that would allow traffic 24 hours a day, 6 days a week. Your requested modification does absolutely nothing to mitigate any impact to the community with regard to traffic and pollution, and essentially just eliminates the original restrictions.

8A

Claiming that the original traffic analysis patterns (obtained in 1999) are applicable 13 years later is absurd. To name a few changes, traffic has increased due to:

- FedEx
- UPS
- Gateway Pointe Industrial Park
- Rio Hondo College
- New businesses on Crossroads Parkway

8B

Since 1957, this area has endured Los Angeles County trash with the accompanying increase in traffic and pollution. Does the PHMRF uphold the commitment of the landfill to protect the value of nearby properties?

8C

At the very least:

- A new traffic study must be done and it must be required to include a larger area than the original.
- A study must be repeated for air quality. It is my understanding the AQMD originally recommended scheduling mobile sources during off peak hours and reduce peak hours of travel. See DEIR #91129070 page 4.8 - 19

8D

8E

In addition, kindly increase notifications to individuals living more than 500 ft of the facility. This sort of thing affects people miles away.

8F

Yours truly,

  
Vickie Anderson

**Clean Air Coalition of  
North Whittier and Avocado Heights**

COMMENT LETTER NO. 9

January 30, 2013

Department of Regional Planning, County of L.A.  
c/o Director of Planning  
320 West Temple Street Room 1348  
Los Angeles, CA. 90012

Re: Permit # 92-251 PHMRF CUP Modification 8.

Dear Director of Planning:

As a resident of Avocado Heights to include North Whittier, I am against the modification of condition 8. 9A

In reference to CUP 92251 Burden of Proof Attachment D, under additional response and A 1,2,3.

\* Comment "accepts 150 tons per day"  
Comment "Boehmke (Department Head Solid Waste Mgt. Dept.) The facility accepts 50 to 60 trucks on average per day. Its not anticipated that the amount of trucks will increase significantly---he added." Article dated Jan.7,2013, San Gabriel Tribune, attached.

\*Compare the DEIR information that maximum capacity of 4400 tons per day: Trip generation

Employees	1190
Refuse Vehicles	1050
Container outloading PHMRF to PHIMF	370
Recovered material outload	290

2900 Trips per day

The Burden of proof clause that the PHMRF "will not" affect health---materially detrimental to the use---jeopardize---public health---general welfare, can only be tested when the PHMRF is at maximum capacity with a building that will never be empty.

ARE WE TO BE THE GUINEA PIGS? 9B

Sincerely, *Nellie A. Rivas*

Nellie Rivas  
1216 Grossmont  
Whittier, CA. 90601

## CLOSURE OF PUENTE HILLS LANDFILL

# 24-hour sorting facility considered

Tribune 1-7-13

By Juliette Funes, Staff Writer  
twitter.com/juliette\_funes

County sanitation officials are intending to turn one of the largest garbage sorting facilities in the area into a 24-hour operation once the Puente Hills Landfill closes.

But its closest neighbors argue that the move will only exacerbate pollution and increase the truck traffic to the area.

To prepare for the closure of the Puente Hills Landfill in October, officials with the Los Angeles County Sanitation District are proposing to extend the hours of operation at the Puente Hills Material Recovery Facility — from 18 hours to 24 hours.

They say the proposal — which will be presented to the Board of Supervisors for approval sometime before the landfill's closure — will allow trash haulers to dump materials at more convenient hours.

"We're not asking for (truck traffic) to be increased at all," said Chuck Boehmke, departmental engineer for the solid waste department. "We could receive the same number of vehicles per day. We're just asking for those vehicles to be able to come in during a 24-hour period in those hours that are the most important to our customers."

Still, residents say the proposal, if approved, would lead to an increase in truck traffic, air pollution and noise.

"It seems unfair that a community like ours has had to bear it for so many years," Avocado Heights resident Marilyn Kamimura said. "We get the impact from someone who is serving the greater number of people, but we have to suffer through it."

Currently, the facility can operate 18 hours a day. It cannot accept materials from 6 to 9 a.m. and 4 to 7 p.m. — a regulation that has been in place for about 20 years.

The restriction was expected to alleviate the morning traffic problem caused by the the combined use of the MRF and landfill. Once the landfill shuts down, officials said they anticipate that a significant amount of material that usually goes to the trash site would need to go to the MRF.

"Various haulers have told us the restricted hours on the MRF are going to be a real problem for them," Boehmke said. "If they can't use the



Watchara Phomicinda Staff Photographer

A worker sweeps leftover debris at Puente Hills Material Recycling Facility in Whittier in December. Los Angeles County sanitation officials are trying to extend the hours of the Puente Hills Material Recovery Facility, but neighbors are fighting it, saying that it would increase pollution and traffic.

**"We're just asking for those vehicles to be able to come in during a 24-hour period in those hours that are the most important to our customers."**

CHUCK BOEHMKE, departmental engineer for the solid waste department

MRF, they'll have to go a facility that is further away. That's more traffic and it's more expensive for them to do that."

Kamimura — who helped create the Clean Air Coalition of North Whittier and Avocado Heights — said trash odor and vehicle traffic are bound to increase.

"It's projected that a total of 2,900 vehicles will go in and out of that building per day, but of which only 1,700 of them will be trucks, carrying garbage and recyclables," she said. "I question the pollution and how the odor should be handled."

According to Boehmke, the facility accepts about 50 to 60 trucks on average a day. It's not anticipated that the amount of trucks will increase significantly, but the MRF will be able to accept more loads, he added.

The Sanitation District began holding public outreach meetings in February to explain to the most affected residents what the plan would entail.

"You take away the landfill and that's three times the traffic that goes down significantly when it's just the MRF operating," Boehmke said. "We're trying to explain to the community that the traffic is going to get better when the landfill closes."

Officials still have to go through

administrative processes, including requesting amendments to environmental impact reports approved in the early 1990s. Notices would also be delivered to residents and public hearings would be scheduled to hear comments on the proposal.

It's a process that can take several months, officials said.

"That's why we're acting on it now," he said. "We want these permits modified in time for when the landfill closes and our customers need to use the MRF."

But for Kamimura and her neighbors, it's just "more of the same thing."

"We're never going to get less," she said. "Eventually, more hours will probably mean more tonnage, and we will live it all over again and it will get larger. It's better to say something now."

juliette.funes@sgun.com  
626-544-0813

Henry J. Oga  
Grace W. Oga  
750 Vinemead Drive  
Whittier, Ca 90601

Director of Planning  
Department of Regional Planning  
County of Los Angeles

Dear Director,

This letter is in response to the notice sent out by the Department of Regional Planning regarding the request to modify CUP No. 92251. The purpose of this letter is to voice our opposition to the granting of this request for the following reasons:

10A

1. Environmental Impact Report (EIR) 1992

The EIR referred to by the Sanitation District's original report, and upon which the original CUP is based is completely outdated and is totally irrelevant to this request to change the hours of operation. This report was taken 21 years ago and conditions have dramatically changed. We have lived in this area over 40 years and have seen these changes take place. Is it reasonable and logical for this request to change any condition of the original CUP without requiring a new EIR study to be undertaken which would be accurate and reflect current conditions in this area? The Sanitation Districts in their zeal to proceed with the project claims that there is no need for another EIR. This is absolutely false and even deceptive. The fact is that this region has changed dramatically.

10B

Regional Changes.

There have been numerous changes that have taken place since 1992 and anyone living in this area has seen these changes take place:

1. Residential and commercial development east of the 605 Fwy has grown greatly, including Hacienda Hts, Roland Hts, Chino Hills, and City of Industry.
2. East bound traffic from Riverside and San Bernadino has at least doubled, especially during rush hour. Even on weekends traffic is at a "snail's pace" particularly near the Puente Hills Mall and near major stores, such as Fry's Electronics (Crossroads Pkwy).
3. The area near the intersection of the Pomona Fwy and 605 Fwy has been especially developed commercially within the past five years, and is currently home to Fedex and other major corporations operating large fleets of 18 wheeler trucks, all of which contribute to increased traffic and pollution. Also, there is increased traffic on Workman

Mill Rd. and Peck Rd. due to students arriving at Rio Hondo College in the mornings. These are the two primary roads that lead to the PHMRF and would surely affect the flow of traffic in and out of that facility.

10B

PHMRF traffic volume @ maximum capacity.

The Sanitation District estimated that there would be 2,900 trips per day @ max. cap. 4,400 tons per day. Even reducing that number by 1000 per day to account for employee and other auxiliary vehicles, we can still assume almost 2,000 trips per day or over 110 trucks per hour. How can you seriously say that that many trucks would not affect our environment?

10C

The Sanitation District also stated that when the Puente Hills landfill closes on October 31, 2013, there should be a decrease in the traffic volume related to refuse. Where do you think these trucks are going to deliver their refuse? The traffic will simply shift to the PHMRF Center, and not actually decrease. Besides, if they really believed that the current traffic volume will decrease in the near future, why is the District asking to change the operating hours as stated in the original CUP in the first place?

10D

We believe the Sanitation Districts should reconsider this proposed amendment. There is no question in our opinion that this could potentially have an enormous impact on traffic, air quality and noise pollution in this region, and to rely on an environmental study that is over 20 years old is not being honest. We would simply ask that before you proceed, a new study of the environmental impact of this proposal be reconsidered.

10E

Sincerely,

  
Henry Oga  
Grace Oga 

February 8, 2013

COMMENT LETTER NO. 11

Director of Planning  
320 West Temple Street, Room 1348  
Los Angeles, California 90012

**REF: Conditional Use Permit No. 92251 – Modification 8**

**This is our “Letter of Protest”**

It is bad enough that we have the largest garbage sorting facilities in the Los Angeles County and now you want to extend the hours of operation to 24 hours. How dare the regional commission adopt a proposal to extend operation hours.

11A

There are five other garbage sorting facilities surrounding our area that the garbage trucks can go to. There is no need to put our neighborhood through an increase of traffic, more air pollution, and noise.

11B

Our home is located on the corner of Workman Mill Road near the MRF and landfill. Doesn't the County Sanitation District Board of Directors consider the impact it will have on our neighborhood? Our neighborhood should not have to put up with an increase of hours of operation. The 18 hours it already has should be decreased not increased. Find other locations for their garbage sorting facilities. Enough is Enough!

11C

The lies being told by the regional planning commissioners that traffic will go down and there is sufficient odor control measures in place are just that LIES!

11D

The “Extended Hours of Operation Proposal” is a bad proposal. It needs to be stopped and other avenues taken. There is no reason to extend the hours when all they have to do is send - 6 additional hours - of garbage trucks to other areas.

11E

Sincerely yours,



Albert and Margaret Porras  
1456 Gemwood Drive  
Whittier, CA 90601  
(626) 660-7643

P. 182

Concerned Residents of Unincorporated North Whittier

February 11, 2013

COMMENT LETTER NO. 12

Dept. Of Regional Planning-County of L.A.

c/o Director of Planning

320 West Temple Street

Room 1348

Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Director of Planning,

We are opposed to Permit # 92-251 PHMRF Cup Modification 8. due to the environmental negative impact we will sustain as a result of this so-called modification. We reside directly in front of the California Country Club Golf Course, from Workman Mill Rd. to Belgreen Dr., located in unincorporated North Whittier. Our surrounding community and neighbors have responded to the article which appeared in the Whittier Tribune a few days ago and this is our input.

12A

We are aware that it is called a modification, however it appears to be an expansion of what exists. This proposed project will allow garbage trucks to move garbage 24 hours a day 6 days a week. In as much as off peak hours are proposed, this modification is still viewed as an expansion for waste trucks to use the surrounding public roads leading to the facility. The proposed change to the existing schedule in and of itself, triggers questionable concerns of increased truck traffic and traffic flow, traffic jams increased spillages, accidents, dust and diesel pollution, noise pollution, foul air dispersed and dilution due to disposing of garbage into the PHLF with diesel trucks at a higher elevation. It is unfounded to imagine that not operating during peak traffic times is a solution. One has only to drive on the 60 Freeway at any daylight hours and see the caravan of trucks for miles traveling east and west.

12B

The common issues we share are by far environmental. We see what planners may not be able to see, as we are the residents who live here and some, 40 year residents. The prime concern that many of us have is the significant impact to the common roadways and intersections into our community roadways. (Specifically, Workman Mill Rd. on the north side of the 60 Freeway, Pellissier Rd. to the West and Crossroads Parkway which crosses and empties out on Workman Mill Rd, curves and also empties out to the off ramp at the 60 Freeway, both east and west where all trucks use to enter the Landfill.)

12C

It is neither just, nor acceptable that this proposed project has not taken into consideration the changes in demographics, construction, freeway expansion, housing , industrial growth, global warming /weather patterns and the emissions monitoring since 1992. While traffic impact analysis reports were done for the PHMRF in 1999 and the CUP for the PHIMF in 2008, so much change has occurred over the

12D

12D

past five years, and needless to say since 1992. We feel that our health and welfare are at risk and that of our future generations. Additionally, there is the fear of a decrease in our property values.

12E

Therefore, we request to keep the Sanitation Districts of L.A. County PHMRF at its present restriction, as we have already sacrificed enough, experiencing the daily traffic conditions and the results of those emissions over the years. We have seen the landfill grow and what with the Railway set to commence this year, it will pose additional noise and increased risk to our community. (This, not to mention the newly proposed Alameda Corridor, in the near future, which will further impact Workman Mill Rd. as the direct route from Valley Blvd. to the north.) Commuters and truck drivers have been using these thoroughfares mentioned above, for years. Signs are even posted in Montebello to DETOUR, using the back roads which lead to Peck Rd. then to Workman Mill Rd. As taxpayers and residents of this community, we deserve better. Thank you for your consideration in this matter. Please respond.

Respectfully,

Name KAZUO HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name YOSHIAKI HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name HISANO HAMADA Address 1408 GEMWOOD DR. WH.  
90601

Name Guillermo Carreon Address 1417 Belgreen Dr WH  
90601

Name Martha Carreon Address 1417 Belgreen Dr. WH.  
90601

Name J.F. HIDALGO Address 1440 GEMWOOD DR  
WH 90601

Name CARMEN R. HIDALGO Address 1440 GEMWOOD DR  
WH 90601

Name Hector Aguilar Address 1445 Gemwood Dr WH 90601

Name Maria Aguilar Address 1445 Gemwood Dr WH 90601

1. ARMANDO D. CERVERA 1433 Belgreen DR, Whittier Ca.  
90601

2. ARMAND R. CERVERA 1433 Belgreen DR. Whittier Ca  
90601

3. RACHAEL O. Cervera 1433 BELGREEN DR. WHITTIER CA  
90601

Concerned Residents of Unincorporated North Whittier

February 11, 2013

Dept. Of Regional Planning-County of L.A.  
c/o Director of Planning  
320 West Temple Street  
Room 1348  
Los Angeles, Ca. 90012  
Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.

Dear Director of Planning,

We are opposed to Permit # 92-251 PHMRF Cup Modification 8. due to the environmental negative impact we will sustain as a result of this so-called modification. We reside directly in front of the California Country Club Golf Course, from Workman Mill Rd. to Belgreen Dr., located in unincorporated North Whittier. Our surrounding community and neighbors have responded to the article which appeared in the Whittier Tribune a few days ago and this is our input.

13A

We are aware that it is called a modification, however it appears to be an expansion of what exists. This proposed project will allow garbage trucks to move garbage 24 hours a day 6 days a week. In as much as off peak hours are proposed, this modification is still viewed as an expansion for waste trucks to use the surrounding public roads leading to the facility. The proposed change to the existing schedule in and of itself, triggers questionable concerns of increased truck traffic and traffic flow, traffic jams increased spillages, accidents, dust and diesel pollution, noise pollution, foul air dispersed and dilution due to disposing of garbage into the PHLF with diesel trucks at a higher elevation. It is unfounded to imagine that not operating during peak traffic times is a solution. One has only to drive on the 60 Freeway at any daylight hours and see the caravan of trucks for miles traveling east and west.

13B

The common issues we share are by far environmental. We see what planners may not be able to see, as we are the residents who live here and some, 40 year residents. The prime concern that many of us have is the significant impact to the common roadways and intersections into our community roadways. (Specifically, Workman Mill Rd. on the north side of the 60 Freeway, Pellissier Rd. to the West and Crossroads Parkway which crosses and empties out on Workman Mill Rd, curves and also empties out to the off ramp at the 60 Freeway, both east and west where all trucks use to enter the Landfill.)

13C

It is neither just, nor acceptable that this proposed project has not taken into consideration the changes in demographics, construction, freeway expansion, housing , industrial growth, global warming /weather patterns and the emissions monitoring since 1992. While traffic impact analysis reports were done for the PHMRF in 1999 and the CUP for the PHIMF in 2008, so much change has occurred over the

13D

past five years, and needless to say since 1992. We feel that our health and welfare are at risk and that of our future generations. Additionally, there is the fear of a decrease in our property values.

13D

Therefore, we request to keep the Sanitation Districts of L.A. County PHMRF at its present restriction, as we have already sacrificed enough, experiencing the daily traffic conditions and the results of those emissions over the years. We have seen the landfill grow and what with the Railway set to commence this year, it will pose additional noise and increased risk to our community. (This, not to mention the newly proposed Alameda Corridor, in the near future, which will further impact Workman Mill Rd. as the direct route from Valley Blvd. to the north.) Commuters and truck drivers have been using these thoroughfares mentioned above, for years. Signs are even posted in Montebello to DETOUR, using the back roads which lead to Peck Rd. then to Workman Mill Rd. As taxpayers and residents of this community, we deserve better. Thank you for your consideration in this matter. Please respond.

13E

Respectfully,

Name  Address 1400 Belgreen St. White, CA 90601

Name Allison R. Gervera Address 1433 Belgreen St. White, Ca 90601  
ALLISON R. GERVERA

Name \_\_\_\_\_ Address \_\_\_\_\_

Armando D. and Rachael Cervera

1433 Belgreen Dr.

Whittier, Ca. 90601

COMMENT LETTER NO. 14

February 7, 2013

Department of Regional Planning, County of L.A

c/o Director of Planning

320 West Temple St

Room 1348

Los Angeles, Ca. 90012

Re: PERMIT # 92-251 PHMRF CUP MODIFICATION 8.,

Dear Director of Planning,

Currently, the PHMRF CUP modification 8., as proposed, is detrimental to the health and well being of residents like us in the North Whittier area, situated directly back to back with the California Country Club. We reside in unincorporated North Whittier, Ca. The negative impact that the proposed project will have on our environment may be anything from dust and diesel pollution, noise pollution, and an increase of foul air. More importantly, the increased numbers of garbage trucks along side and parallel to the 60 Freeway and surface streets will definitely impact our community.

14A

As residents of unincorporated La Puente and unincorporated Whittier for the past 40 years, we have experienced our community evolve, change and grow in numbers. Presently, it is at risk of being swallowed up by the many projects surrounding the perimeter. Traffic is the number one concern we have noticed and witnessed firsthand. We have observed the change in traffic patterns, traffic jams, and traffic pollution. We have witnessed an increase in traffic accidents- some fatal, caused by semi-trucks and tractor trailers causing endless back-ups on the 60 Freeway all too often. There have been power outages caused by cars and trucks racing on Workman Mill Rd. at a rate often over 45 miles per hour. We have watched commuters use this road as a thoroughfare to access both the 605 and 60 freeways, and have seen the back up of automobiles and trucks, as drivers attempt to access the 10 freeway when the 60 freeway is closed down due to spillages.

14B

Likewise, we have even heard these accidents and can always tell if there will be delays up to one to three hours as helicopters hover over our community constantly. The traffic backups have been over the top. It is no secret, that Crossroads Parkway has been mentioned in the many traffic reports over the years as the location of numerous accidents both during peak hours and off peak hours. It is no coincidence that this is the on and off ramp which leads directly into the landfill and is direct access to

14C

the PHMRF. When just one traffic light signal is out, the impact and traffic stall created from Valley Blvd. on the east to Pellissier Rd to the Southwest is unbearable. There is also the Rio Hondo Community College which is located next door to the PHMRF, which may impact student commuters and their access to the college with so much inbound and outbound garbage waste trucks going in and out 24 hours six days a week.

14C

Additionally, we feel that we have given our lives and careers to public service over the past 40 years. We are told that we are the “Baby Boomers” and look forward to living our years in this community. However, as it appears today, our future appears to be very bleak, as we wonder if we will be affected by the many pollutants caused by emissions and pollutants. (One of us is a Vietnam Veteran who has already served the country in battle.) We are now asking to be served by our own L.A. County Dept. of Planning by listening to us, and it is our hope that our concerns will be taken to heart.

14D

Consequently, we bring this matter to your attention as we understand that the proposed project will allow garbage trucks to move garbage 24 hours a day 6 days a week. Obviously, residents have been told that there will be no impact however, it would be better for all concerned if there could be a current emission and dust monitoring by AQMD at full capacity. We deserve to come home each day to a clean and safe environment.

14E

Sincerely,

Armando & Rachael Cervera

Clean Air Coalition of  
North Whittier and Avocado Heights

COMMENT LETTER NO. 15

February 7, 2013

Director of Planning  
Department of Regional Planning, County of Los Angeles  
320 W. Temple Street, Rm. 1348  
Los Angeles, CA 90012

RE: Permit #92-251 PHMRF CUP Modification 8

Dear Director:

As of January 20, 2013, I have been a resident of the Gladstone neighborhood (also included in Avocado Heights) for 50 years. Extreme changes have taken place in that time period. I am writing you to register my protest against the so-called "modification" permit mentioned above.

15A

According to Webster's New World Dictionary, the word Modify means: 1. to change partially in character, form, etc. 2. to limit slightly. 3. to limit in meaning. It appears to me that rather than any limitation this Modification 8 is actually increasing use.

15B

Example: Present limitation between the hours of 6:00 to 9:00 a.m. and 4:00 p.m. and 7:00 p.m. These are the hours when thousands of residents are driving to and from work. If you begin allowing trash trucks to enter the PHMRF during these hours it will only increase traffic, causing more and more congestion and pollution, to say nothing of the noise this would bring.

I am requesting that you do not pass this permit in consideration of, not only myself as a resident, but for my neighbors and future generations who would be living here and in the surrounding areas. If you would like proof of visible pollution I would invite you to come any day of the week to sweep my driveway and patio and see the amount of black soot that covers my property.

15C

Please consider the requests of the residents of this area now, since up until this time we have not been considered. Thank you.

Sincerely,

*Mrs. Margaret Caster*

Mrs. Margaret Caster  
2308 Gala Street  
Whittier, CA 90601

**RESPONSES TO COMMENT LETTER NO. 1**  
**Teresa M. Aguilar, Whittier, February 12, 2013**

**1A: Against Conditional Use Permit (CUP) Modification**

Comment noted.

**1B: Noise Impacts from PHMRF Operations and Associated Truck Traffic**

The currently approved conditional use permit (CUP) allows the Puente Hills Materials Recovery Facility (PHMRF) to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts of Los Angeles County (Sanitation Districts) are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the Puente Hills Landfill (PHLF) and the PHMRF were assumed to operate concurrently, which will no longer be the case after October 31, 2013, when the PHLF closes.

The initial study for the Addendum to the 1992 Environmental Impact Report (EIR) for the combined PHLF and PHMRF project determined that there would be no new noise impacts associated with the removal of the peak hour restrictions at the PHMRF. There are several reasons for this assessment:

- The 1992 EIR estimated 7,040 one-way trips per day would occur from the combined PHLF and PHMRF project. Today, approximately 5,142 trips per day (or less) would occur from the combined project even with the removal of the peak hour restrictions. Further reductions in traffic would occur after the PHLF closes on October 31, 2013. These reductions in truck and employee commute trips would also result in proportionate reductions in noise due to transport.
- The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.
- The PHMRF contains automated doors which close immediately after trucks enter the building. While this feature is primarily designed for odor control, it also helps prevent noise from migrating outside the building. This design feature will remain in place. Additionally, the loading of MRF residuals into outbound containers occurs at the back of the building, which faces the heavily vegetated hillside of the PHLF.
- The PHMRF is surrounded by commercial buildings and the PHLF landfill. The nearest resident is over 1/4 mile away. The 60 FWY, office buildings, restaurants, and businesses with significant distribution or transport activities are closer to residents than the PHMRF.

**RESPONSES TO COMMENT LETTER NO. 2**  
**Richard and Marilyn Kamimura, Whittier, February 11, 2013**

**2A: AGAINST CUP MODIFICATION**

Comment noted.

**2B: PHLF CLOSURE WAS ALREADY CONSIDERED IN 1999 CUP**

The Los Angeles County Board of Supervisors (BOS) approved CUP 92251-(4) on August 3, 1999, establishing the PHMRF. As noted in BOS Finding No. 38, the county concurred with the Sanitation Districts' EIR that there were potential transportation and circulation impacts from the combined project of the proposed PHMRF and the continued operation and expansion of the PHLF, particularly during the morning peak hours when the PHLF received the majority of the refuse trucks. As a consequence, condition 8.i was imposed as a mitigation measure. There is no mention of the PHLF closure in the BOS findings.

In the 1992 EIR, the future traffic impacts in the year 2013 included the traffic volume from:

1. Landfill traffic
2. PHMRF traffic
3. A growth rate of 1 percent per year in traffic other than the landfill
4. Traffic from planned developments

If the PHLF closure had been a foregone conclusion, then the landfill traffic would not have been included in this analysis.

**2C: MODIFYING CONDITION 8 WOULD BE A REVERSAL OF THE 1999 CUP**

As noted in BOS Finding No. 38, CUP Condition 8.i was imposed to mitigate the traffic impacts of the combined PHMRF and PHLF project. The current traffic levels from the combined project are estimated to be 5,142 trips per day or less, which is far below the 7,040 trips estimated in the 1992 EIR. The combined project traffic will drop even lower after the PHLF closes on October 31, 2013. Additionally, with the PHLF currently operating at 8,500 tons per day or less as a result of the economic downturn, it is not closing in the morning as in years past. Consequently, the truck traffic is no longer concentrated in the early morning hours, which was the primary basis for the traffic impacts during morning peak hours.

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently, 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours, decreasing the vehicle count per hour.

The Los Angeles County Department of Public Works (LACDPW) reviewed the estimated traffic levels with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections. Consequently, CUP Condition 8.i is no longer necessary as a mitigation measure since the traffic impacts would be less than significant.

## **2D: CUP CHANGE IS GUISE FOR EXPANSION**

No change to the permitted capacity of the PHMRF is being sought by the Sanitation Districts. Consequently, no capacity increase or expansion will result from removing the peak hour traffic restrictions.

## **2E: INCREASING PHMRF HOURS DISREGARDS HEALTH, WELFARE, AND QUALITY OF LIFE OF RESIDENTS**

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. When the BOS approved CUP No. 92551-(4) on August 3, 1999, they made the following findings regarding the PHMRF:

- The PHMRF will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area and will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- The site is adequate in size and shape to accommodate the development features prescribed in the Zoning Ordinance and otherwise required to integrate the use approval with the uses in the surrounding area.
- The site has adequate traffic access and is adequately served by other public or private facilities which it requires.

Consequently, the BOS found that the PHMRF satisfied the burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code when the combined PHLF and PHMRF project was estimated to generate 7,040 trips per day.

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The Sanitation Districts are requesting that the peak hour restrictions be removed for the remaining 6 hours at a time when the traffic from the combined project has dropped significantly since 1992 and is expected to be even lower after the PHLF closes on October 31, 2013. The LACDPW found that the traffic impacts resulting from removal of the peak hour restrictions would be less than significant. Consequently, the PHMRF would continue to satisfy burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code, which include affects to health, welfare, and quality of life.

**RESPONSES TO COMMENT LETTER NO. 3**  
**Victoria Anderson, Whittier, February 11, 2013**

**3A: ALLOW HAULERS TO TAKE REFUSE TO OTHER MRFS RATHER THAN PHMRF, WHICH IS LOCATED IN A HOT SPOT**

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important component in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently, 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours, decreasing the vehicle count per hour.

The utilization of the PHMRF by local haulers rather than more distant MRFs will be price and market driven. However, the less vehicle miles traveled by local haulers, the less air pollution impacts there will be. Given that air pollution disperses regionally, less air emissions benefits everyone in the South Coast Air Basin. To our knowledge, the South Coast Air Quality Management District (SCAQMD) has not designated Whittier or the adjacent cities as an air quality "hot spot."

**3B: BALANCING THE BENEFITS OF THE PHMRF PROJECT AGAINST THE UNAVOIDABLE RISKS AND ADVERSE ENVIRONMENTAL EFFECTS**

Under Section 15021 of the California Environmental Protection Act (CEQA) Guidelines, an agency is required to prepare a statement of overriding considerations that reflect the agency's duty to balance competing public objectives when it approves a project that will cause one or more significant environmental effect.

Under Section 15093 of the CEQA Guidelines, the decision-making agency is required to "balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable."

The Board of Directors for Sanitation District No. 2 of Los Angeles County considered the regional benefits and importance of the PHMRF as part of the county's waste-by-rail system and weighed them against any potential environmental effects. The Board found:

“Public benefits from the continued public ownership and operation of landfills within this County as provided in the Solid Waste Management Action Plans previously approved by the District and the County of Los Angeles. In addition, the project would avoid an estimated 15 to 33 million miles which would otherwise be driven by waste haulers with the resultant addition of 3 million to 6.5 million gallons of fuel and 427 to 1,206 tons of emissions. The project would provide in-County capacity with the expansion of the Puente Hills Landfill and could use out-of-County disposal capacity, if available, through the operation of a materials recovery and rail loading facility. If this project were not implemented the Board finds that the increased cost to the residents and businesses in Los Angeles County could approximate \$200 million per year.”

On January 10, 2013, the Board of Directors for Sanitation District No. 2 of Los Angeles County certified the Addendum to the 1992 EIR and made the findings that a supplemental EIR is not required because:

- The proposed change in the approved project is not a substantial change that will require major revisions of the previous EIR
- The proposed change in the approved project will not have a significant effect on the environment or result in a substantial increase in the severity of the previously identified significant effects.

Consequently, as an important component of the county's solid waste management system, the PHMRF provides a public benefit; and the CUP change would not result in any additional adverse environmental effects beyond those already identified in the 1992 EIR.

## RESPONSES TO COMMENT LETTER NO. 4

Clean Air Coalition of North Whittier and Avocado Heights, Whittier, February 11, 2013

### **4A: COMMUNITIES REPRESENTED BY CLEAN AIR COALITION OF NORTH WHITTIER AND AVOCADO HEIGHTS**

Comment noted.

### **4B: CUP CHANGE WOULD RESULT IN FOUL AIR, DUST, AND DIESEL POLLUTION TO COMMUNITIES FROM 1,700 TRUCKS DAILY MOVING 4,400 TONS PER DAY OF GARBAGE**

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged.

With the permitted capacity of PHMRF remaining unchanged, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours, decreasing the vehicle count per hour.

Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below).

FACILITY	1992 EIR Trips per Day <sup>1</sup>	CURRENT MAXIMUM Trips per Day <sup>1</sup>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

PHLF is expected to remain at this lower operating level until it closes in the next few months. The estimated traffic between now and October 31, 2013, for the combined project is as follows:

FACILITY	TONNAGE Tons per Day	TRAFFIC Trips per Day <sup>1</sup>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity

4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

Consequently, there would be no increase in total daily traffic, foul air, dust, or diesel pollution from the PHMRF.

#### **4C: FOUL AIR, DUST, AND DIESEL POLLUTION FROM THE PHMRF WILL CONCENTRATE AND DISPERSE TO LOCAL COMMUNITIES**

The 1992 EIR found significant unavoidable environmental impacts associated with the combined PHLF and PHMRF project, including air quality impacts. The Addendum to the 1992 EIR found no new environmental impacts would be caused by removing the peak hour restrictions for the PHMRF. As indicated in Response 3A, there are less air emissions from the combined project today than in 1992. These air emissions will continue to decrease after the PHLF closes on October 31, 2013.

Additionally, The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system will remain in place.

#### **4D: REQUEST FOR EMISSIONS AND DUST MONITORING BY SCAQMD AT PHMRF**

SCAQMD staff has reviewed the Addendum to the 1992 EIR and agree with the initial study's finding that there are less total air emissions today from the combined project than those contained in the 1992 EIR and that the removal of the peak hour restrictions for the PHMRF would not result in an air emissions increase compared to the 1992 EIR. If there is no significant air quality impact associated with the proposed CUP change, then emissions and dust monitoring are unwarranted.

#### **4E: REQUEST COMPARISON OF EMISSIONS MONITORING RESULTS TO THOSE TAKEN BY SCAQMD IN 2008 ON 2190 PELLISSIER PLACE**

The SCAQMD air monitoring station at 2190 Pellissier Place was a temporary station designed to collect background ambient air data prior to the PHIMF commencing operations. It has since been removed. A request would need to be made to SCAQMD for that data.

#### **4F: REQUEST FOR TWO-YEAR ODOR COMPLAINT HISTORY FOR DART**

There have been no odor complaints at the Downey Area Recycling and Transfer (DART) facility, South Gate Transfer Station, or at the PHMRF over the last two years.

#### **4G: REQUEST REPORT ON COMPLIANCE WITH SCAQMD RULE 410 AND RULE 1193**

In accordance with Rule 410, the Sanitation Districts submitted an alternative odor management plan (AOMP) to the local enforcement agency (LEA) for approval. Both the SCAQMD and LEA approved the AOMP.

SCAQMD Rule 1193 applies to waste collection fleets. The Sanitation Districts are not involved in residential curbside or commercial waste collection. The waste haulers that come to our facilities, such as the PHMRF and PHLF, would likely be subject to this rule.

#### **4H: TRAFFIC ANALYSES FOR THE PHMRF AND PUENTE HILLS INTERMODAL FACILITY (PHIMF) SHOULD BE CONNECTED**

The 1995 Supplemental EIR and 2008 PHIMF EIR do interconnect these facilities. The Certified 2008 EIR for PHIMF includes the PHMRF in the discussion and analysis. The EIR Executive Summary includes the following statement:

“County Sanitation District No. 2 of Los Angeles County (LACSD), the applicant, is proposing to construct and operate the Puente Hills Intermodal Facility (PHIMF) for the exclusive purpose of loading and unloading rail-ready shipping containers of nonhazardous municipal solid waste (MSW) between rail cars and trucks. Under a phased development plan, the proposed facility would eventually have the capacity to handle up to two trains per day, or approximately 8,000 tons per day (tpd) of MSW, including up to 4,000 tpd from the nearby Puente Hills Materials Recovery Facility (PHMRF), with the remainder coming from other materials recovery facilities and transfer stations. The containerized MSW would be transported by rail to the Mesquite Regional Landfill (MRL) in Imperial County for disposal.”

The LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**4I: ADDITIONAL TRUCK TRAFFIC FROM BUSINESSES/DEVELOPMENT AND THE NEW 60 FWY CARPOOL LANE HAVE OCCURRED SINCE 2005**

CEQA requires the environmental analysis and impact determination to include what is reasonably foreseeable at the time of the EIR. The 1992 EIR included approved or planned developments (office buildings and restaurants) along Crossroads Parkway in evaluating future cumulative traffic conditions. Traffic conditions were estimated for the year 2013.

The LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**4J: REQUEST FOR UPDATED TRAFFIC ANALYSIS**

The 1992 EIR evaluated known and reasonably foreseeable impacts from traffic. Additional analyses were conducted in preparation for the 1995 Subsequent EIR and for the Puente Hills Intermodal Facility (PHIMF) EIR. In each case, the Board of Directors of Sanitation District No. 2 of Los Angeles County and the City Council of the City of Industry made findings and approved the project. No additional traffic study is necessary.

The LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**4K: SANITATION DISTRICTS SHOULD NOT BE COMPETING WITH THE PRIVATE SECTOR**

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important component in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**4L: KEEP THE CURRENT PEAK HOUR RESTRICTIONS**

Comment noted. See Response 4K for need to remove peak hour restrictions.

**RESPONSES TO COMMENT LETTER NO. 5**  
**Don Moss, City of Industry, February 4, 2013**

**5A: AGAINST CUP MODIFICATION**

Comment noted.

**5B: FREEWAYS ALREADY CONGESTED**

The LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

The Los Angeles County Metropolitan Transportation Authority is the responsible agency for assessing the level of service (LOS) of the county's freeways and making improvements to increase their LOS. The combined PHLF and PHMRF project constitutes a very small percentage of the 60 FWY and 605 FWY traffic during morning and afternoon peak hours. The traffic analysis for 1992 EIR found that the combined PHLF and PHMRF traffic constituted:

- 2.73 percent of the total 1995 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 2.30 percent of the total 2013 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 1.74 percent of the total 1995 freeway traffic on the 605 FWY south of Peck Road during morning peak hours
- 1.46 percent of the total 2013 freeway traffic on the 605 FWY south of Peck Road during morning peak hours

The eastbound 60 FWY at Crossroads Parkway was not significantly impacted during the morning peak hours. The morning peak hour traffic was the worst-case scenario, not the afternoon peak hour traffic.

**5C: VALLEY BOULEVARD AND WORKMAN MILL ROAD ARE USED WHEN FREEWAYS ARE CONGESTED**

The PHMRF uses the same Crossroads Parkway entrance for the PHLF. The traffic analysis of the concurrent PHLF and PHMRF operation found that the majority (82 percent) of traffic entering and exiting the Crossroads Parkway entrance at the PHLF use the 60 FWY, as shown in the table below:

<b>FREEWAY/STREET</b>	<b>PERCENT OF TOTAL TRAFFIC</b>
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

Approximately 10 percent of the total traffic would use Peck Road south of Workman Mill Road. Peck Road is a local street that is far away from and in the opposite direction of Avocado Heights. A very small percentage of the total traffic would be on the non-freeway access portion of Crossroads Parkway,

which is near Avocado Heights. Based on the traffic distribution analysis, the traffic impacts to local streets were determined to be less than significant.

Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**5D: TRAFFIC IMPACT DETERMINATIONS IN 1992 EIR ARE NO LONGER VALID AND DID NOT CONSIDER FUTURE CUMULATIVE IMPACTS**

The 1992 EIR evaluated known and reasonably foreseeable impacts from traffic. Additional analyses were conducted in preparation for the 1995 Supplemental EIR and for the 2008 PHIMF EIR. In each case, the Board of Directors of Sanitation District No. 2 of Los Angeles County and the City Council of the City of Industry made findings and approved the project. No additional traffic study is necessary.

The LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**5E: IT HAS YET TO BE SUBSTANTIATED THAT THE TRAFFIC DECREASE FROM THE PHLF CLOSURE OFFSETS THE PHMRF TRAFFIC WITHOUT THE PEAK HOUR RESTRICTIONS**

Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below).

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

PHLF is expected to remain at this lower operating level until it closes in the next few months. The estimated traffic between now and October 31, 2013, for the combined project is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity
- 4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

**5F: 1992 EIR NEEDS TO CONSIDER CUMULATIVE IMPACTS FROM FUTURE PROJECTS/DEVELOPMENTS IN ORDER TO BE VALID**

The 1992 EIR included future cumulative traffic impacts for the year 2013, where the traffic volume consisted of:

1. Landfill traffic
2. PHMRF traffic
3. A growth rate of 1 percent per year in traffic other than the landfill
4. Traffic from planned developments

Unknown or unplanned developments are considered by CEQA as not being reasonably foreseeable and too speculative to include at the time of the environmental analysis and impact determination.

**5G: CUP MODIFICATION MUST BE DENIED BECAUSE EIR DOCUMENTS ARE INSUFFICIENT AND INCORRECT, AND THERE ARE MAJOR TRAFFIC IMPACTS**

Under CEQA, once an EIR is certified by the lead agency, the entire environmental document is and will continue to be legally valid and complete. As shown in Response 5E, the traffic from the combined

PHLF and PHMRF project is less today than what was analyzed in 1992. The traffic from the combined project will continue to decrease after the PHLF closes on October 31, 2013, even with the removal of the peak hour restrictions for the PHMRF. Therefore, the project clearly has less traffic impacts than originally analyzed, approved, and permitted.

**5H: REQUEST THAT A COMMUNITY BENEFIT FUND BE CREATED USING PART OF THE PHMRF TIP FEE**

Since the traffic impacts from the proposed CUP change are less than significant, mitigation measures are not required or necessary. Therefore, the request for the establishment of a community benefit fund is not warranted.

**5I: LOCAL GEOGRAPHY MAKES VALLEY BOULEVARD AND WORKMAN MILL ROAD/PUENTE AVENUE TRAFFIC RELIEF ROUTES FOR 60 AND 605 FREEWAYS**

See Response 5C.

**5J: PHMRF WILL EXACERBATE THE EXISTING TRAFFIC BOTTLENECKS ON VALLEY BOULEVARD, WORKMAN MILL ROAD AND PUENTE AVENUE, PARTICULARLY NEAR AVOCADO HEIGHTS**

The total traffic generated by the PHMRF will remain the same even with the peak hour restrictions removed. As noted in Response 5E, the total traffic from the combined PHLF and PHMRF project has decreased since 1992 and will continue to decrease after the PHLF closes. Consequently, the combined project will have less traffic impacts over time.

Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**5K: CLAIMS OF NO PHLF TRAFFIC AFTER CLOSURE ARE NOT CORRECT**

The Sanitation Districts' traffic analysis was based on the "...cessation of waste deliveries to the PHLF after closure on October 31, 2013..." Issues related to the future park activities at the PHLF will require a separate CEQA document developed by the Los Angeles County Department of Parks and Recreation, which will likely be the lead agency for the park's development.

**5L: PHIMF WILL DRAW TRUCK TRAFFIC BEYOND THE MAXIMUM AMOUNT CLAIMED IN THE EIR**

The PHIMF has a separate certified EIR that accounts for all potential environmental impacts and incorporates mitigation measures, where feasible, to lessen impacts to less than significant. The Executive Summary for the PHIMF EIR includes the following statement summarizing the rail shipments and material receipts:

"County Sanitation District No. 2 of Los Angeles County (LACSD), the applicant, is proposing to construct and operate the Puente Hills Intermodal Facility (PHIMF) for the exclusive purpose of loading and unloading rail-ready shipping containers of nonhazardous municipal solid waste (MSW) between rail cars and trucks. Under a phased development plan, the proposed facility would eventually have the capacity to handle up to two trains per day, or approximately 8,000 tons per day (tpd) of MSW, including up to 4,000 tpd from the nearby Puente Hills Materials Recovery Facility (PHMRF), with the remainder coming from other materials recovery facilities and transfer stations. The containerized MSW would be transported by rail to the Mesquite Regional Landfill (MRL) in Imperial County for disposal."

Unit trains will be loaded when a sufficient number of containers are available. Therefore, an increase in waste recovery at the PHMRF will not increase the number of trucks into the PHIMF, but rather it will reduce the frequency of trains.

**5M: THE SAN GABRIEL VALLEY COUNCIL OF GOVERNMENTS IS PROPOSING AN ELECTRIC TRUCK ROADWAY WHICH WILL CAUSE CONGESTION TO LOCAL STREETS DURING CONSTRUCTION**

The electric truck roadway, if it becomes a project, will require an environmental document to determine the potential environmental and cumulative impacts. The public will have the opportunity to comment to the lead agency.

**5N: PHMRF SHOULD NOT BE REQUIRED TO BE COMPETITIVE WITH OTHER MRFs AND SHOULD BE SHUT DOWN SINCE IT IS NOT CRITICAL TO THE PHIME**

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is permitted as a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important component in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed with operating revenues over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. Closure of the facility would not result in a tax saving, it would instead negatively impact the operation of the PHIMF. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**RESPONSES TO COMMENT LETTER NO. 6**  
**Marilyn Kamimura, Whittier, January 29, 2013**

**6A: AGAINST CUP MODIFICATION**

Comment noted.

**6B: COMMUNITY WAS UNAWARE OF PHMRF 1992 EIR AND 1999 PERMITTING**

The Sanitation Districts properly noticed the preparation and release of the Draft EIR for the combined PHLF and PHMRF project. Public hearings were held on August 4, 5, and 6, 1992; and September 14, 1992. The Sanitation Districts receive numerous comment letters from communities surrounding the PHLF and PHMRF.

**6C: QUESTIONS THE SANITATION DISTRICTS NOTIFICATION PROCESS**

The Sanitation Districts follow the requirements contained in CEQA regarding the notification of environmental documents. For EIRs, the Notice of Preparation, the Notice of Release of the Draft EIR, and the Notice of Public Hearings are posted on the Sanitation Districts' website, published in local newspapers, and mailed to stakeholders. The EIRs are available online for downloading and hard copies are placed in local libraries during the public review period.

**6D: COMMUNITY DESERVES TO KNOW THE IMPACTS FROM THE CUP CHANGE AND A PUBLIC HEARING**

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill’s final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that analyzed in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to the Los Angeles County Department of Public Works (LACDPW) to determine if there were any significant impacts to county roadways or local street intersections. As shown in Attachment 1, the Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

The Addendum was properly noticed to the public when it was on the agenda for the January 9, 2013 board meeting of the Board of Directors of the Sanitation Districts No. 2 of Los Angeles County. Public comments were received at the board meeting. The Sanitation Districts’ application to modify CUP 92551-(4) was publicly noticed, and comments were received from the public during the noticing and review period.

The Regional Planning Commission’s hearing for the Sanitation Districts’ appeal will be held locally. When the hearing date is confirmed, it will be publicly noticed and posted. Public comments will be received.

Consequently, the public has not been denied the opportunity for input on this project.

**6E: REQUEST THAT THE DEPARTMENT OF REGIONAL PLANNING EXTEND THEIR NOTIFICATION BEYOND 500 FEET FROM THE FACILITY**

This is a request to the Department of Regional Planning.

**RESPONSES TO COMMENT LETTER NO. 7**  
**Richard Kamimura, Whittier, January 29, 2013**

**7A: AGAINST CUP MODIFICATION**

Comment noted.

**7B: A SUPPLEMENTAL EIR IS NECESSARY**

An Addendum to 1992 EIR is the appropriate CEQA document for the proposed removal of peak hour restrictions for the PHMRF. The proposed change meets the requirements of Section 15164 of the CEQA Guidelines, where the lead agency is required to prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 of the CEQA Guidelines have occurred. On January 10, 2013, the Sanitation District No. 2 Board of Directors certified the Addendum to the 1992 EIR and made the findings that a supplemental EIR is not required because:

- The proposed change in the approved project is not a substantial change that will require major revisions of the previous EIR
- The proposed change in the approved project will not have a significant effect on the environment or result in a substantial increase in the severity of the previously identified significant effects.

The above findings meet the requirements of Section 15162 of the CEQA Guidelines.

**7C: A MITIGATION MEASURE IS BEING REMOVED SO A SUPPLEMENTAL EIR IS NECESSARY**

The currently approved CUP is for the combined PHLF and PHMRF project. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently at their maximum permitted capacity, which will no longer be case after October 31, 2013, when the PHLF closes.

The initial study for the Addendum found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill's

final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.

- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to the LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

A supplemental EIR is not necessary since there are no new significant environment impacts as a result of the CUP change. Consequently, an Addendum is the appropriate CEQA document.

**7D: SINCE THE PHIMF IS NOT OPERATING, TRUCK TRAFFIC DURING PEAK HOURS IS OPEN FOR PUBLIC REVIEW**

The PHIMF has a separate certified EIR that accounts for all potential environmental impacts and incorporates mitigation measures, where feasible, to lessen impacts to less than significant. The Executive Summary for the PHIMF EIR includes the following statement summarizing the rail shipments and material receipts:

“County Sanitation District No. 2 of Los Angeles County (LACSD), the applicant, is proposing to construct and operate the Puente Hills Intermodal Facility (PHIMF) for the exclusive purpose of loading and unloading rail-ready shipping containers of nonhazardous municipal solid waste (MSW) between rail cars and trucks. Under a phased development plan, the proposed facility would eventually have the capacity to handle up to two trains per day, or approximately 8,000 tons per day (tpd) of MSW, including up to 4,000 tpd from the nearby Puente Hills Materials Recovery Facility (PHMRF), with the remainder coming from other materials recovery facilities and transfer stations. The containerized MSW would be transported by rail to the Mesquite Regional Landfill (MRL) in Imperial County for disposal.”

Additionally, the certified Subsequent EIR and CUP for the Mesquite Regional Landfill allows for trucking (outloading) from the PHMRF and other MRFs in Los Angeles County.

Lastly, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**RESPONSES TO COMMENT LETTER NO. 8**  
**Victoria Anderson, Whittier, January 30, 2013**

**8A: CUP CHANGE DOES NOT INCLUDE ANY MITIGATION FOR TRAFFIC AND POLLUTION**

The mitigation measure containing the peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes. These mitigation measures are no longer necessary since traffic and air emissions are less today than those identified in the 1992 EIR for the combined PHLF and PHMRF project and will continue to decrease when the PHLF closes. Additionally, new mitigation measures are unwarranted since there are no new significant impacts associated with the CUP change.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill's final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to the LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

**8B: THE TRAFFIC ANALYSIS IN THE ORIGINAL EIR CANNOT BE VALID YEARS LATER GIVEN NEW BUSINESSES AND DEVELOPMENT IN THE AREA**

Under CEQA, once an EIR is certified by the lead agency, the entire environmental document is and will continue to be legally valid and complete.

The 1992 EIR included future cumulative traffic impacts for the year 2013, where the traffic volume consisted of:

1. Landfill traffic
2. PHMRF traffic
3. A growth rate of 1 percent per year in traffic other than the landfill
4. Traffic from planned developments

Unknown or unplanned developments are considered by CEQA as not being reasonably foreseeable and too speculative to include at the time of the environmental analysis and impact determination.

**8C: DOES PHMRF UPHOLD THE COMMITMENT TO PROTECT NEARBY PROPERTY VALUES?**

Yes. The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling. The Crossroads Parkway entrance is being used to enter and exit the PHMRF, which is adjacent to the 60 FWY onramps and off-ramps, thereby significantly limiting traffic impacts to local streets. The internal roads between the Crossroad Parkway entrance and the PHMRF scale house provides more than 3/4 mile of queuing capacity, so there is no potential for backup of traffic onto city streets. A dedicated non-public road has also been constructed between the PHMRF and the PHIMF to facilitate the shipment of MRF residuals through the waste-by-rail system.

Significant investments have been made to ensure that the facility operates in a manner that is environmental protective and conducive to being a good and responsible neighbor.

**8D: A NEW TRAFFIC STUDY MUST BE DONE**

The projected PHMRF traffic with the peak hour restrictions removed was submitted to the LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant. A new traffic study is not necessary.

**8E: A NEW AIR QUALITY STUDY MUST BE DONE**

SCAQMD staff has reviewed the Addendum to the 1992 EIR and found no new air quality impacts would result from the removal of the peak hour restrictions for the same reasons cited in Response 8A. A new air quality study is not necessary.

**8F: REQUEST THAT THE DEPARTMENT OF REGIONAL PLANNING EXTEND THEIR NOTIFICATION BEYOND 500 FEET FROM THE FACILITY**

This is a request to the Department of Regional Planning.

## RESPONSES TO COMMENT LETTER NO. 9

Nellie Rivas, Whittier, January 30, 2013

### **9A: AGAINST CUP MODIFICATION**

Comment noted.

### **9B: MEETING THE BURDEN OF PROOF CAN ONLY BE DONE WHEN THE PHMRF IS OPERATING AT ITS MAXIMUM PERMITTED CAPACITY; AND THE PHMRF WILL NEVER BE EMPTY**

On August 3, 1999, the Los Angeles County Board of Supervisors (BOS) approved CUP No. 92551-(4) and made the following findings regarding the PHMRF:

- The PHMRF will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area and will not be materially detrimental to the use, enjoyment, or valuation property of other persons located in the vicinity of the site and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- The site is adequate in size and shape to accommodate the development features prescribed in the Zoning Ordinance and otherwise required to integrate the use approval with the uses in the surrounding area.
- The site has adequate traffic access and is adequately served by other public or private facilities which it requires.

Consequently, the BOS found that the PHMRF satisfied the burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged.

The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to

reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**RESPONSES TO COMMENT LETTER NO. 10**  
**Henry & Grace Oga, Whittier, February 5, 2013**

**10A: AGAINST CUP MODIFICATION**

Comment noted.

**10B: THE 1992 EIR IS OUTDATED GIVEN THE DEVELOPMENT THAT HAS OCCURRED SINCE THEN, SO A NEW EIR SHOULD BE DONE**

Under CEQA, once an EIR is certified by the lead agency, the entire environmental document is and will continue to be legally valid and complete.

The 1992 EIR included future cumulative traffic impacts for the year 2013, where the traffic volume consisted of:

1. Landfill traffic
2. PHMRF traffic
3. A growth rate of 1 percent per year in traffic other than the landfill
4. Traffic from planned developments

Unknown or unplanned developments are considered by CEQA as not being reasonably foreseeable and too speculative to include at the time of the environmental analysis and impact determination.

**10C: HOW CAN 2,900 TRIPS PER DAY NOT BE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?**

The CUP change does not result in any new significant impact beyond those already identified in the 1992 EIR. Additionally, the projected PHMRF traffic with the peak hour restrictions removed was submitted to the LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

**10D: TRAFFIC WILL NOT DECREASE AFTER PHLF CLOSURE, IT WILL SIMPLY SHIFT TO THE PHMRF**

With the removal of the peak hour restrictions, the estimated traffic between now and October 31, 2013, for the combined project is as follows:

FACILITY	TONNAGE Tons per Day	TRAFFIC Trips per Day <sup>1</sup>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity
- 4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**10E: A NEW EIR SHOULD BE DONE**

See Responses 10B, 10C, and 10D.

**RESPONSES TO COMMENT LETTER NO. 11**  
**Albert and Margaret Porras, Whittier, February 8, 2013**

**11A: PHMRF OPERATIONS BEING EXTENDED TO 24 HOURS**

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**11B: THERE ARE OTHER MRFs IN THE AREA; NO NEED TO INCREASE TRAFFIC, AIR POLLUTION, AND NOISE**

The other MRFs typically only receive waste from waste collection companies and are not necessarily open to the general public. The closest MRFs which accept waste from the general public are Grand Central Recycling and Transfer Station, 7 miles from the PHMRF, and the Norwalk Transfer Station, 14 miles from the PHMRF. Additionally, as stated above, the PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county.

On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR, finding that eliminating the peak hour restrictions on the PHMRF would not be a substantial change that would require major revisions of the previous EIR, would not have a significant effect on the environment, and would not result in a substantial increase in the severity of previously identified significant effects.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill's final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.

- The projected PHMRF traffic with the peak hour restrictions removed was submitted to LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

**11C: MRF OPERATIONS SHOULD NOT BE INCREASED; OTHER MRFs SHOULD BE USED INSTEAD**

See Responses 11A and 11B.

**11D: LIES ARE BEING TOLD REGARDING TRAFFIC GOING DOWN AND THERE BEING SUFFICIENT ODOR CONTROL MEASURES**

We respectfully disagree. With the removal of the peak hour restrictions, the estimated traffic between now and October 31, 2013, for the combined project is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity
- 4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing.

**11E: AGAINST CUP MODIFICATION**

Comment noted.

**RESPONSES TO COMMENT LETTER NO. 12**  
**Concerned Residents of Unincorporated North Whittier, February 11, 2013**

**12A: AGAINST CUP MODIFICATION**

Comment noted.

**12B: THE CUP MODIFICATION APPEARS TO BE AN EXPANSION OF THE PHMRF, TRIGGERING MORE TRAFFIC AND AIR POLLUTION**

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**12C: CONCERNS ABOUT TRAFFIC ON STREETS AROUND OUR COMMUNITY**

The traffic analysis of the concurrent PHLF and PHMRF operation found that the majority (82 percent) of traffic entering and exiting the Crossroads Parkway entrance use the 60 FWY, as shown in the table below:

FREEWAY/STREET	PERCENT OF TOTAL TRAFFIC
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

Approximately 10 percent of the total traffic would use Peck Road south of Workman Mill Road. Peck Road is a local street that is far away from and in the opposite direction of Avocado Heights. Only 3 percent of the total traffic would be on the non-freeway access portion of Crossroads Parkway, towards Avocado Heights. Based on the traffic distribution analysis, the traffic impacts to local streets were determined to be less than significant.

Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**12D: 1992 TRAFFIC ANALYSIS IS OUTDATED AND EXCLUDED DEVELOPMENTS SINCE THEN; HEALTH AND WELFARE ARE AT RISK; PROPERTY VALUES MAY DECREASES**

Under CEQA, once an EIR is certified by the lead agency, the entire environmental document is and will continue to be legally valid and complete. The 1992 EIR included future cumulative traffic impacts for the year 2013, where the traffic volume consisted of:

1. Landfill traffic
2. PHMRF traffic
3. A growth rate of 1 percent per year in traffic other than the landfill
4. Traffic from planned developments

Unknown or unplanned developments are considered by CEQA as not being reasonably foreseeable and too speculative to include at the time of the environmental analysis and impact determination.

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

On August 3, 1999, the Los Angeles County Board of Supervisors (BOS) approved CUP No. 92551-(4) and made the following findings regarding the PHMRF:

- The PHMRF will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area and will not be materially detrimental to the use, enjoyment, or valuation property of other persons located in the vicinity of the site and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- The site is adequate in size and shape to accommodate the development features prescribed in the Zoning Ordinance and otherwise required to integrate the use approval with the uses in the surrounding area.

- The site has adequate traffic access and is adequately served by other public or private facilities which it requires.

Consequently, the BOS found that the PHMRF satisfied the burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR, finding that eliminating the peak hour restrictions on the PHMRF would not be a substantial change that would require major revisions of the previous EIR, would not have a significant effect on the environment, and would not result in a substantial increase in the severity of previously identified significant effects.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.
- The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close

after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system remains in place.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill’s final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

The traffic analysis of the concurrent PHLF and PHMRF operation found that the majority (82 percent) of traffic entering and exiting the Crossroads Parkway entrance use the 60 FWY, as shown in the table below:

FREEWAY/STREET	PERCENT OF TOTAL TRAFFIC
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

Approximately 10 percent of the total traffic would use Peck Road south of Workman Mill Road. Peck Road is a local street that is far away from and in the opposite direction of Avocado Heights. Only 3 percent of the total traffic would be on the non-freeway access portion of Crossroads Parkway, towards Avocado Heights. Based on the traffic distribution analysis, the traffic impacts to local streets were determined to be less than significant.

Given all the above, we believe that property values would not be affected by the project or by the proposed CUP change.

**12E: AGAINST CUP MODIFICATION**

Comment noted. See Responses 12A through 12D.

**RESPONSES TO COMMENT LETTER NO. 13**  
**Concerned Residents of Unincorporated North Whittier, February 11, 2013**

**13A: AGAINST CUP MODIFICATION**

Comment noted.

**13B: THE CUP MODIFICATION APPEARS TO BE AN EXPANSION OF THE PHMRF, TRIGGERING MORE TRAFFIC AND AIR POLLUTION**

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

The purpose of the CUP change is to allow the PHMRF to operate as originally intended, where truck shipments are logistically aligned with customer schedules and market needs. Materials recovery inside the building is a 24-hour operation; however, the blackout times for material receipts and shipments place the PHMRF at a competitive disadvantage compared to other MRFs in the county. This affects the facility's ability to be financially sustainable.

The PHMRF is an important facility in the county's solid waste management system. It is an integral part of the waste-by-rail system that was developed and publicly financed over the last 20 years to ensure that Los Angeles County would have the infrastructure and disposal capacity in place long after the closure of the Puente Hills Landfill and the other landfills in the county. It is paramount that the peak hour restrictions be removed so that the PHMRF can be financially sustainable and allowed to reasonably operate without competitive disadvantages. As a publicly owned and operated facility, the PHMRF helps to moderate the rates charged to the public since all MRFs compete in the same marketplace.

**13C: CONCERNS ABOUT TRAFFIC ON STREETS AROUND OUR COMMUNITY**

The traffic analysis of the concurrent PHLF and PHMRF operation found that the majority (82 percent) of traffic entering and exiting the Crossroads Parkway entrance use the 60 FWY, as shown in the table below:

FREEWAY/STREET	PERCENT OF TOTAL TRAFFIC
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

Approximately 10 percent of the total traffic would use Peck Road south of Workman Mill Road. Peck Road is a local street that is far away from and in the opposite direction of Avocado Heights. Only 3 percent of the total traffic would be on the non-freeway access portion of Crossroads Parkway, towards Avocado Heights. Based on the traffic distribution analysis, the traffic impacts to local streets were determined to be less than significant.

Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**13D: 1992 TRAFFIC ANALYSIS IS OUTDATED AND EXCLUDED DEVELOPMENTS SINCE THEN; HEALTH AND WELFARE ARE AT RISK; PROPERTY VALUES MAY DECREASES**

Under CEQA, once an EIR is certified by the lead agency, the entire environmental document is and will continue to be legally valid and complete. The 1992 EIR included future cumulative traffic impacts for the year 2013, where the traffic volume consisted of:

5. Landfill traffic
6. PHMRF traffic
7. A growth rate of 1 percent per year in traffic other than the landfill
8. Traffic from planned developments

Unknown or unplanned developments are considered by CEQA as not being reasonably foreseeable and too speculative to include at the time of the environmental analysis and impact determination.

The permitted capacity of PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

On August 3, 1999, the Los Angeles County Board of Supervisors (BOS) approved CUP No. 92551-(4) and made the following findings regarding the PHMRF:

- The PHMRF will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area and will not be materially detrimental to the use, enjoyment, or valuation property of other persons located in the vicinity of the site and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- The site is adequate in size and shape to accommodate the development features prescribed in the Zoning Ordinance and otherwise required to integrate the use approval with the uses in the surrounding area.

- The site has adequate traffic access and is adequately served by other public or private facilities which it requires.

Consequently, the BOS found that the PHMRF satisfied the burden of proof required by Sections 22.56.1650 and 22.56.040 of the Zoning Code.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR, finding that eliminating the peak hour restrictions on the PHMRF would not be a substantial change that would require major revisions of the previous EIR, would not have a significant effect on the environment, and would not result in a substantial increase in the severity of previously identified significant effects.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.
- The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close

after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system remains in place.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

<b>FACILITY</b>	<b>1992 EIR Trips per Day<sup>1</sup></b>	<b>CURRENT MAXIMUM Trips per Day<sup>1</sup></b>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill’s final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

The traffic analysis of the concurrent PHLF and PHMRF operation found that the majority (82 percent) of traffic entering and exiting the Crossroads Parkway entrance use the 60 FWY, as shown in the table below:

FREEWAY/STREET	PERCENT OF TOTAL TRAFFIC
60 Freeway Westbound using Crossroads Parkway	78
60 Freeway Eastbound using Crossroads Parkway	4
605 Freeway using Workman Mill/Pellissier Place Road	5
Peck Road South (non-freeway/local)	10
Crossroads Parkway (non-freeway/local)	3

Approximately 10 percent of the total traffic would use Peck Road south of Workman Mill Road. Peck Road is a local street that is far away from and in the opposite direction of Avocado Heights. Only 3 percent of the total traffic would be on the non-freeway access portion of Crossroads Parkway, towards Avocado Heights. Based on the traffic distribution analysis, the traffic impacts to local streets were determined to be less than significant.

Given all the above, we believe that property values would not be affected by the project or by the proposed CUP change.

**13E: AGAINST CUP MODIFICATION**

Comment noted. See Responses 12A through 12D.

**RESPONSES TO COMMENT LETTER NO. 14**  
**Armando and Rachael Cervera, February 7, 2013**

**14A: CUP MODIFICATION WOULD BE DETRIMENTAL TO HEALTH AND WELFARE OF NORTH WHITTIER RESIDENTS GIVEN INCREASE TRAFFIC AND POLLUTION**

The permitted capacity of the PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

On January 10, 2013, as the lead agency, the Sanitation Districts certified an Addendum to the 1992 EIR, finding that eliminating the peak hour restrictions on the PHMRF would not be a substantial change that would require major revisions of the previous EIR, would not have a significant effect on the environment, and would not result in a substantial increase in the severity of previously identified significant effects.

The initial study prepared for the Addendum found that air emissions resulting from the elimination of the peak hour restrictions would be less than those identified in the 1992 EIR for several reasons:

- The PHLF is currently operating at 8,500 tpd or less, which is 36 percent lower or more than the 13,200 tpd operating level assumed in the 1992 EIR. Consequently, the air emissions are proportionately less.
- The maximum permitted capacity of the PHMRF would remain unchanged and so would the total number of trucks assumed in the 1992 EIR, which means there would be no increase in the total air emissions.
- The trucks and vehicles today are generally cleaner burning and more efficient than those assumed in the 1992 EIR, which would make the emission factors (estimated emissions per mile for specific constituents and vehicles types) that would be used in an EIR today even lower than in 1992. With lower emission factors, the estimated emissions would be lower.
- The elimination of the peak hour restrictions for the PHMRF would be implemented after the PHLF closes. With PHLF closing, there would be a significant reduction in the overall air emissions.
- If local refuse haulers use the PHMRF rather than more distant MRFs, air emissions associated with transport would be less.

- The PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system remains in place.

The initial study also found that there would be no new traffic impacts resulting from the elimination of the peak hour restrictions for several reasons:

- Employee and truck traffic from the combined PHLF and PHMRF project has significantly dropped since the 1992 EIR due to the dramatically lower refuse tonnage received at PHLF as a result of the economic downturn (see table below). PHLF is expected to remain at this lower operating level until it closes in the next few months.

FACILITY	1992 EIR Trips per Day <sup>1</sup>	CURRENT MAXIMUM Trips per Day <sup>1</sup>
Puente Hills Landfill	4,140	2,242
Puente Hills Materials Recovery Facility	2,900	2,900
Combined Project	7,040	5,142

Note 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.

- Truck traffic from the PHLF will be very small after it closes on October 31, 2013, given that refuse trucks will no longer be received and that the majority of the dirt needed for the landfill's final cover has already been stockpiled onsite. Consequently, after October 31, 2013, the traffic from the combined project will be significantly lower than that seen today and dramatically lower than that found in the 1992 EIR.
- The permitted capacity of the PHMRF will remain unchanged. As a result, the 2,900 trips per day associated with the PHMRF operating at its maximum capacity will also remain unchanged. The total traffic would simply be spread out over 24 hours rather than concentrated in the currently unrestricted 18 hours.
- The projected PHMRF traffic with the peak hour restrictions removed was submitted to LACDPW to determine if there were any significant impacts to county roadways or local street intersections. The Traffic and Lighting Division of the LACDPW has determined that the impacts from the proposed elimination of peak hour restrictions would be less than significant.

The initial study for the Addendum also found that with less truck traffic from the combined project than in the 1992 EIR and no physical changes to the PHMRF that there would be no new noise impacts resulting from the elimination of peak hour restrictions.

**14B: RESIDENTS HAVE SEEN LOCAL GROWTH AND BACKUPS TO ACCESS THE 605 AND 60 FREEWAYS**

The total traffic generated by the PHMRF will remain the same even with the peak hour restrictions removed. Additionally, the total traffic from the combined PHLF and PHMRF project has decreased since 1992 and will continue to decrease after the PHLF closes. Consequently, the combined project will have less traffic impacts over time.

The combined PHLF and PHMRF project constitutes a very small percentage of the 60 FWY and 605 FWY traffic during morning and afternoon peak hours. The traffic analysis for 1992 EIR found that the combined PHLF and PHMRF traffic constituted:

- 2.73 percent of the total 1995 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 2.30 percent of the total 2013 freeway traffic on the 60 FWY west of Crossroads Parkway during the morning peak hours
- 1.74 percent of the total 1995 freeway traffic on the 605 FWY south of Peck Road during morning peak hours
- 1.46 percent of the total 2013 freeway traffic on the 605 FWY south of Peck Road during morning peak hours

The eastbound 60 FWY at Crossroads Parkway was not significantly impacted during the morning peak hours. The morning peak hour traffic was the worst-case scenario, not the afternoon peak hour traffic.

Additionally, the LACDPW reviewed the estimated traffic levels for the combined PHLF and PHMRF project with the PHMRF peak hour restrictions removed and found no significant impact to the county's roadways or local intersections.

**14C: TRAFFIC IS ALREADY HEAVY AND IT WILL BE EXACERBATED WITH MORE REFUSE TRUCKS FROM THE PHMRF**

See Responses 14A and 14B.

**14D: REQUEST THAT OUR CONCERNS BE HEARD REGARDING AIR POLLUTION AND QUALITY OF LIFE**

Traffic and related air emissions from the combined PHLF and PHMRF project will decline over time, not increase. With the removal of the peak hour restrictions, the estimated traffic between now and October 31, 2013, for the combined project is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity
- 4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

FACILITY	TONNAGE	TRAFFIC
	Tons per Day	Trips per Day <sup>1</sup>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

**14E: SCAQMD SHOULD MONITOR AIR EMISSIONS AND DUST AT THE PHMRF WHEN OPERATING AT ITS PERMITTED CAPACITY**

SCAQMD staff has reviewed the Addendum to the 1992 EIR and agree with the initial study's finding that there less air emissions today from the combined project than those contained in the 1992 EIR and that the removal of the peak hour restrictions for the PHMRF would not result in an air emissions increase compared to the 1992 EIR. If there is no significant air quality impact associated with the proposed CUP change, then emissions and dust monitoring are unwarranted.

Additionally, the PHMRF was designed with state-of-art odor control systems to prevent any offsite impacts of nuisance odors resulting from refuse handling, which includes automatic doors that close after the trucks enter the building, an extensive misting system inside the building, and ventilation air scrubbing. This system remains in place.

## RESPONSES TO COMMENT LETTER NO. 15

Margaret Caster, February 7, 2013

### **15A: AGAINST CUP MODIFICATION**

Comment noted.

### **15B: CUP MODIFICATION APPEARS TO BE A CAPACITY INCREASE CAUSING MORE TRAFFIC, POLLUTION, AND NOISE**

The permitted capacity of the PHMRF will remain unchanged. Consequently, the total number of trucks associated with the facility operating at the maximum capacity will also remain unchanged. Currently 18 of the 24 hours are unrestricted with regard to truck traffic and employee commutes. The same total traffic would simply be spread out over 24 hours rather than concentrated into 18 hours.

The currently approved CUP allows the PHMRF to process waste 24 hours per day, and allows unrestricted inbound and outbound truck traffic and employee commuting for 18 of the 24 hours. Condition No. 8.i of CUP 92551-(4) places restrictions on the remaining 6 hours, where inbound and outbound truck shipments from the PHMRF and employee commutes are not allowed during morning and afternoon peak hours. Peak hours are defined as 6 to 9 a.m. and 4 to 7 p.m. The Sanitation Districts are requesting that the peak hour restrictions be removed while keeping the permitted capacity of the PHMRF unchanged. The peak hour restrictions were put in place because the PHLF and the PHMRF were assumed to operate concurrently, which will no longer be case after October 31, 2013, when the PHLF closes.

Traffic and related air emissions from the combined PHLF and PHMRF project will decline over time, not increase. With the removal of the peak hour restrictions, the estimated traffic between now and October 31, 2013, for the combined project is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill	8,500 <sup>2</sup>	2,242
Puente Hills Materials Recovery Facility	4,400 <sup>3</sup>	2,900
Combined Project	12,900 <sup>4</sup>	5,142

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – Estimated maximum tonnage at the PHLF, which currently ranges between 6,380 and 8,500 tpd
- 3 – Assumes that the PHMRF is operating at the maximum permitted capacity
- 4 – This refuse tonnage is approximately 27 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project

After the PHLF closes on October 31, 2013, landfill closure activities will commence. The estimated traffic for the combined project, reflecting the PHLF closure activities, is as follows:

<b>FACILITY</b>	<b>TONNAGE Tons per Day</b>	<b>TRAFFIC Trips per Day<sup>1</sup></b>
Puente Hills Landfill (closure)	0	900
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	3,800 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 46 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

The PHLF landfill closure is expected to take two years to complete. After which, the postclosure period will commence. The estimated traffic for the combined project, reflecting the PHLF postclosure activities, is as follows:

FACILITY	TONNAGE Tons per Day	TRAFFIC Trips per Day <sup>1</sup>
Puente Hills Landfill (postclosure)	0	80
Puente Hills Materials Recovery Facility	4,400	2,900
Combined Project	4,400 <sup>2</sup>	2,980 <sup>3</sup>

Notes:

- 1 – Trips are one-way trips. One roundtrip consists of two one-way trips. For example, 2,900 one-way trips equals 1,450 roundtrips.
- 2 – This refuse tonnage is approximately 75 percent lower than the 17,600 tpd shown in the 1992 EIR for the combined project
- 3 – This traffic level is approximately 58 percent lower than the 7,040 trips per day shown in the 1992 EIR for the combined project

**15C: AGAINST CUP MODIFICATION**

Comment noted.