APPENDIX B

Responses to the NOP

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 4/11/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 4

Please Call If The Material You Received Was Incomplete or Illegible:

TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comments from: (1) Scott Morgan, State Clearinghouse -3 pages.



Arnold Schwarzenegger Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Notice of Preparation

RECEIVED CITY OF LOS ANGELES

APR 1 1 2007

ENVIRONMEN

April 3, 2007

To:

Reviewing Agencies

Re:

Community Recycling and Recovery

SCH#-2007041015

Attached for your review and comment is the Notice of Preparation (NOP) for the Community Recycling and Recovery draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process:

Please direct your comments to:

Jimmy Li20
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan

Senior Planner, State Clearinghouse

Attachments cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH#

2007041015

Project Title

Community Recycling and Recovery

Lead Agency

Los Angeles, City of

Type

NOP Notice of Preparation

Description

The project site is used as a solid waste facility and a recycling and resource recovery operation which is currently permitted for a 1,700 tons per day (TPD) transfer station/MRF and which for recycling receives approximately 1,200 TPD of construction materials, 1,500 TPD of organics, 300 TPD of food materials, and 150 TPD of wood materials. A Conditional Use Permit, Site Plan Review, Zone Variance (Parking) and a Revised Solid Waste Facilities Permit for the entire facility have been requested for the Proposed Project which includes construction of an approximate 107,000 square foot enclosure building with air filtration system to be located over the business' existing organics area, with 40 parking spaces (already existing). The purpose of the revised permit is to consolidate all resource recovery operations under one comprehensive permit in order to respond to new recycling industry

Lead Agency Contact

Name

Jimmy Liao

Agency

City of Los Angeles

Phone

213 978-1270

email

jimmy.liao@lacity.org

Address

200 North Spring Street, Room 750

City

Los Angeles

State CA

Zip 90012

213 978-1343

Project Location

County Los Angeles

City

Region

Cross Streets

DeGarmo Avenue/W. Pendleton Street

Parcel No.

Township

Range

Section

Base

Proximity to:

Highways

Airports

Railways

Waterways

Schools

Land Use

Project Issues

Aesthetic/Visual; Air Quality; Water Quality; Landuse; Noise; Traffic/Circulation; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation, Office of Historic Preservation; Department of Parks and Recreation: Department of Water Resources: Department of Fish and Game, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 04/03/2007

Start of Review 04/03/2007

End of Review 05/02/2007

PLANNING/SUB/ENV

ax:213-978-134

2007

TONY CÁRDENAS

Los Angeles City Councilman, 6TH District



April 13, 2007

City of Los Angeles – Planning Department Attn: Jimmy Liao 200 N. Spring Street, Suite Los Angeles, CA 90012

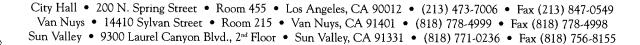
Re: Scoping Meeting for Community Recycling EIR

Dear Mr. Liao,

The community of Sun Valley is once again considering an Environmental Impact Report (EIR) for a transfer station/recycling facility being proposed by Community Recycling. It is notable that the community is having an opportunity to review and participate in a process that will help us mitigate the impacts facing Sun Valley due to these heavy industrial uses.

I have listed below my concerns of the proposed project, as well as mitigation measures which I would like the EIR to consider for implementation:

- 1) Land Use/Planning Impacts: This site has been operating for many years; half of the property has operated under an existing permit and the other half illegally without a permit. As a result, the city has not had a chance to review the cumulative potential impacts of the site. There are several more restricted zones within 1000 feet of the property. Consequently, I would ask that an operation of this magnitude be required to obtain a Conditional Use Permit for the entire transfer station operation. The impacts of allowing land uses such as these leads to blight and the degradation of the industrial area, even with responsible operators.
- 2) Transportation Impacts: The original permit allowed for 1,700 tons per day in solid waste to come to the site. Currently the site is accepting nearly 5,300 tons per day of waste and recycling materials, five times as much as originally permitted. The environmental impacts originally considered were for "truck trips" of 1,700 tons per day. However, it must now study the traffic impacts which are being proposed by increasing tons to 7,000 tons per day.
- 3) Air Quality Issues/Aesthetics of the proposed projects: Sorting and separating practices of solid waste, construction and recyclable materials are presently done on open ground of the facility. From here waste materials are transferred to other locations. This process allows particulate matter and odors to be distributed in the air. The EIR should look at the impacts and mitigation measures, by requiring that all piles and transfer operations take place inside a "negative air pressure" fully enclosed facility.





I look forward to a meaningful review of all of the issues associated with Community Recycling. Again, we ask that businesses be socially responsible for the community in which they operate in and impact. If my office can be of further assistance, please feel free to contact myself or Jim Dantona of my staff at (213) 473-7006.

Tony Cardenas

Councilman, Sixth District

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 4/20/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 6

Please Call If The Material You Received Was Incomplete or Illegible:

TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comments from: (1) Luis Nuno, LADWP - 5 pages.

Department of Water and Power



the City of Los Angel

ANTONIO R. VILLARAIGOSA

Commission H. DAVID NAHAI, President EDITH RAMIREZ, Vice President MARY D. NICHOLS NICK PATSAOURAS FORESCEE HOGAN-ROWLES BARBARA B. MOSCHOS, Secretary RONALD F. DEATON, General Mon

RECEIVED CITY OF LOS ANGELES

APR 19 2007

ENVIRONMENTAL

April 15, 2007

Mr. Jimmy Liao, Project Coordinator Department of City Planning Environmental Review Section 200 North Spring Street, Room 750 Los Angeles, CA 90012

Dear Mr. Liao:

Subject: Community Recycling and Recovery

Request för Comments

The Los Angeles Department of Water and Power (LADWP) is hereby providing comments to the above-referenced project, as requested in your letter dated April 2, 2007.

We are providing information for consideration and incorporation into the planning, design, and development efforts for the proposed project. Regarding water needs for the proposed project, this letter does not constitute a response to a water supply assessment due to recent state legislative activity (i.e., SB 901, SB 610, and SB 221) for development projects to determine the availability of long-term water supply. Our understanding is that a water supply assessment by the water supply agency needs to be requested and completed prior to issuing a draft Negative Declaration of draft EIR.

Before investing resources in preparation of a water supply assessment, we recommend that you contact LADWP (Mr. Alvin Bautista, (213) 367-0800 or by e-mail at Alvin.Bautista@water.ladwp.com) and provide specific project details as requested to help staff make a determination on whether or not the proposed project meets the criteria for compliance with this legislation.

If proposed project parameters (e.g., development details such as type, square footage, anticipated water demand by 2020, population increase, etc.) are such that they are subject to state law requiring a water availability assessment, a separate request must be made in writing to:

> Mr. James B. McDaniel Chief Operating Officer - Water System Los Angeles Department of Water and Power 111 North Hope Street, Room 1455 Los Angeles, CA 90012

Water and Power Conservation ... a way of life



The following are our preliminary comments on the proposed project.

Water Needs

The Los Angeles Department of Water and Power (LADWP) owns, maintains, and operates 8-inch water mains in Pendleton Street, De Garmo Avenue, and Randall Street fronting the subject site. There are several water services ranging in size from 1-inch to 2-inch serving the site from the aforementioned 8-inch water mains. And there are several public fire hydrants supplied by same 8-inch water mains in front and near the site.

The Water Distribution System can adequately supply water for domestic use. Available fire flow for private on-site fire protection can be determined by filing a Service Advisory Request(s) from our New Business Office at (213) 367-2130. Public fire hydrant requirements, including fire flow, are set by the Los Angeles Fire Department (LAFD). Public fire flow can be analyzed at the request of the LAFD.

As the project proceeds further in the design phase, we recommend the project applicant or designated Project Management Engineer contact Mr. Hugo Torres at (213) 367-1178 or by e-mail at Hugo Torres@water.ladwp.com to make arrangements for water supply service needs.

Water Conservation

LADWP has a number of energy efficiency and water conservation programs. Since the proposed project is in the planning and design phase, it may be an opportunity to incorporate some of these measures in the design and operations of the proposed facilities.

LADWP is always looking for means to assist its customers to use water resources more efficiently and welcomes the opportunity to work with new developments to identify water conservation opportunities. Some water conservation measures are enclosed. Mr. Thomas Gackstetter is the Water Conservation Program Manager and can be reached at (213) 367-0936 or by e-mail at Thomas Gackstetter@water.ladwp.com.

Please note that this letter pertains to the Water System only. Issues related to power needs can be addressed to Mr. Kris L. Jolley at (213) 367-3413 or by e-mail at Kris Jolley@ladwp.com. Issues related to energy efficiency and "Trees for a Green LA" can be addressed to Mr. Steve Matsuda at (213) 367-4947 or by e-mail at Steve Matsuda@ladwp.com. Issues related to green power, solar energy, and electric-transportation can be addressed to Mr. William Glauz at (213) 367-0410 or by e-mail at William Glauz@ladwp.com.

Please include LADWP in your mailing list and address it to:

Mr. Charles C. Holloway Supervisor of Environmental Assessment Los Angeles Department of Water and Power 111 North Hope Street, Room 1044 Los Angeles, CA 90012 If there are any additional questions, please contact me at (213) 367-1235 or by e-mail at Luis.Nuno@water.ladwp.com.

Sincerely,

Luis Nuno

Engineer of East Valley District Water Distribution Engineering

LN:vh

Enclosure

c: Mr. Charles C. Holloway

Mr. Alvin Bautista

Mr. Hugo Torres

Mr. Kris L. Jolley

Mr. Thomas Gackstetter

Mr. Steve Matsuda

Mr. William Glauz

IMPACT OF THE PROPOSED PROJECT ON THE WATER SYSTEM AND METHODS OF CONSERVING WATER LOS ANGELES DEPARTMENT OF WATER AND POWER

IMPACT ON THE WATER SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MVVD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in the mid-1970s and late 1980s dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

WATER CONSERVATION

The Water System will assist residential, commercial, and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction:

- Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.
- Reclaimed water should be investigated as a source to irrigate large landscaped areas.

-2:-

- 3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking Unthirsty," pp. 78-85, or consult a landscape architect.
- Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.
- 5. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling.
- Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Water Conservation Office by calling (213) 367-0944.

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 4/27/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 2

Please Call If The Material You Received Was Incomplete or Illegible:

TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comment from: (1) Sheryll Del Rosario, SCAG-1 page.

SOUTHERN CALIFORNIA



GOVERNMENTS

Main Office

'818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers: President: Tranne B. Burke, Los Angeles County - First Vice President Gary Ovitt, San Bernardino County - Second Vice President: Richard Dison, Lake Forest - Immediate Past President: Toni Young, Port Hueneme

Imperial County: Victor Carrillo, Imperial County-Ion Edney, El Centro

Los Angeles County: Yvonne B. Burke, Los Angeles County - Zev Yaroslavsky, Los Angeles County - Jim Aldinger, Manhatten Beach - Harry Baldwin, San Gabriel - Todd Campbell, Burbank Tony Cardenas, Los Angeles - Stan Carroll, La Habra Heights . Margaret Clark, Rosemead . Gene Caniels, Paramount - Judy Durtlap. Inglewood - Rac Gabelich, Long Beach - David Gaffn, Downey - Eric Garcetti, Los Angeles Wendy Grevel, Los Angeles - Frank Gurule, Cudahy - Jim Jeffra, Lancaster - Janice Hahn, Los Angeles - Isadore Hall, Compton: - Keith W. Hanks, Azusa - José Huizor, Los Angeles - Tom LaBonge, Los Angeles - Paula Lantz, Pomona -Paul Nowatka, Torrance - Pam O'Connor. Santa Montos - Bernard Parks, Los Angeles - Jan Perry, Los Angeles - Ed Reyes, Los Angeles - Bili Rosendahl, Los Angeles - Greig Smith, Los Angeles - Tom Sykes, Walnut - Mike Ten, South Pasadena - Tonia Reyes Uranga, Long Beach -Antonio Viliaralgosa, Los Angeles - Dennis Washbum, Galabasas - Jack Welss, Los Angeles -Herb J. Wesson, Jr., Los Angeles, - Dennis Jine, Los Angeles

Ocange County: Chris Norby, Orange County-Christine Barnes. Je Palma - John Beauman, Brea - Lou Bone, Tostin - Debbie Cook, Huntington Beach - Leslie Daigle, Newport Beach - Richard Dixon, Lake Forest - Troy Edgar. Los Alamitos - Peui Glaeb. Laguna Niguel -Sharon Quink, Fullerton

Riverside County: Jeff Stone, Riverside County

- Thomas: Buckley, Lake Elsinore – Bonnie Flickinger, Moreno Valley - Ron Loveridge, Riverside – Greg Pettis, Cathedral City - Ron Roberts, Terracula

San Bernerdine County Gary Ovitt, San Bernardine County - Lawrence Dele, Barstow - Paul Eaton, Montdelir - Lee Ann Ganta, Grand Terrace - Tam Jaspet, Town of Apple Valley - Leny McCallon, Highland - Beborah Robertson, Riatto - Alan Wanner, Chairfo

Ventura County: Linda Parks, Ventura County • Glen Becerra, Simi Valley - Carl Morehouse, San Buenaventura - Toni Young, Port Hueneme

Drauge County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robin Lowe, Hemet

Yentura County Transportation Commissions Keith Millhouse, Moupark April 24, 2007

Mr. Jimmy Liao, Project Coordinator Department of City Planning Environmental Review Section 200 N. Spring Street, Room 750 Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20070180 Community Recycling and Recovery

Dear Mr. Liao:

Thank you for submitting the Community Recycling and Recovery for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Community Recycling and Recovery, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's April 1-15, 2007 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1856. Thank you.

宝物囊 复设工

Sincerely,

SHERYLL DEL ROSARI

Associate Planner

Intergovemmental Review

Doc #134902

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343



FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 5/2/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 3

Please Call If The Material You Received Was Incomplete or Illegible:

TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comment from: (1) Cheryl Powell, CalTran District 7-2 pages.

STATE OF CALIFORNIA—BUSINESS. TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER GOVERNOR

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING IGR/CEQA BRANCH 100 MAIN STREET LOS ANGELES, CA 90012-3606 PHONE (213) 897-3747 FAX (213) 897-1337



Flex your power! Be energy efficient!

April 30, 2007

Mr. Jimmy C. Liao
City of Los Angeles Planning Department
Environmental Review Section
200 North Spring Street, Room 750
Los Angeles, CA 90012

Community Recycling and Recovery
Los Angeles City Case Env-2006-6373-EIR
Notice of Preparation of Bnvironmental Impact Report
IGR/CEQA # 070422/EK
Vicinity LOS/ 5/36.36 170/R20.55

Dear Mr. Liao:

We have received the Notice of Preparation dated April 3rd with the Public Meeting notice dated April 3rd for the project referenced above right. Substantial increases in activity at the Community Recycling and Recovery facility in the Sun Valley area of northern San Fernando Valley are proposed. For the California State Department of Transportation (California), we have the following comments on this proposal.

We note the increase from 1200 to 2000 tons / day for construction materials and the increase from 1700 to 2500 tons / day for waste transfer / MRF. These increases amount to 65 and 45 percent increases above the existing volumes.

Considering that certain waste-hauling vehicles such as transfer trailers can be quite long, we ask for consideration of potential impacts at street intersections at and near freeway entrance and exit ramps of nearby State-facility routes I-5 and SR-170. Very long trailer vehicles making turns could slow the passage of vehicles through intersections. We ask that the local agency and applicant consider measures to avoid excessive or poorly timed truck platooning (caravans of trucks). Conditional requirements might be used, like minimum headway times between arriving or departing vehicles.

If excessive impacts on peak-hour traffic occur, we note that time restrictions on truck hauling would relieve them. Caltrans permits might be required for use of over-size or -weight trucks on State Route roads. Application for Caltrans permits should be made early enough to allow for processing time.

Mr. Jimmy C. Liao April 30, 2007 Page 2 of 2

If you have any questions on our comments, refer to our internal IGR/CEQA Record Number for this letter of 070422/EK. Please do not hesitate to contact our review coordinator Edwin Kampmann at (213) 897-1346 or to contact me at (213) 897-3747.

Sincerely,

CHERYL J. POWELL

IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 5/9/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 5

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TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comment from: (1) Fred Booker, LAPD - 4 pages.

LOS ANGELES POLICE DEPARTMENT

WILLIAM J. BRATTON Chief of Police



P.O. Box 30158 Los Angeles, Calif. 90030 Telephone: (213) 485-3134 TDD: (877) 275-5273 Ref #: 2.2.2

May 3, 2007

Mr. Jimmy C. Liao City Planner/Project Coordinator Department of City Planning 200 North Spring Street, Room 750 Los Angeles, CA 90012

Dear Mr. Liao:

PROJECT TITLE: Community Recycling and Recovery

The proposed project involves the Los Angeles Police Department's Foothill Area. Enclosed are Area crime rates, predominant crimes, response time to emergency calls for service, and personnel statistics, which were obtained from Foothill Area. The Department's response is based on information received from the Area in which the project is located, Information Technology Division and input from Community Relations Section, Crime Prevention Unit personnel.

A project of this size would have a less than significant impact on police services in the Foothill Area. The Department is available to advise you on crime prevention features appropriate for the design of the property involved in this project. The Department strongly recommends developers contact Crime Prevention Unit personnel regarding these features.

Upon completion of the project, you are encouraged to provide Foothill Area Commanding Officer with a diagram of each portion of the property. The diagram should include access routes and any additional information that might facilitate police response.

Should you have any questions regarding this response, please contact Sergeant Ralph Morales, Crime Prevention Unit, Community Relations Section, at (213) 485-3134.

Very truly yours,

WILLIAM J. BRATTON

Chief of Police

Officer in Charge

FRED BOOKER Lied

Community Relations Section Office of the Chief of Police

Enclosures

FOOTHILL AREA

The Community Recycling and Recovery project is located in the Foothill Area in Reporting District (RD) 1683. Foothill Area covers 46.13 square miles and the station is located at 12760 Osborne Street, Pacoima, California, (818) 756-8861.

The service boundaries of Foothill Area are as follows: Los Angeles City boundary to the North, Los Angeles City Boundary, Golden State Freeway to the South, Los Angeles City Boundary to the East and Pacoima Wash, Los Angeles City Boundary to the West.

The service boundaries for RD 1683 inclusively are as follows: Pendleton Street to the North, Golden State Freeway to the South, Sunland Boulevard to the East.

The average response time to emergency calls for service in Foothill Area during 2006 was 7.5 minutes. The Citywide average during 2006 was 6.9 minutes. There are approximately 224 swom officers and 25 civilian support staff deployed at Foothill Area.

There were 25 crimes per 1,000 persons in Foothill Area in 2006. Individual RD crime statistics, population and crimes per 1000 persons are listed on the attached RD information sheets. The predominant crimes in Foothill Area were burglary from vehicle and vehicle theft.

Prepared by:

Officer Marco A. Jimenez Community Relations Section Crime Prevention Unit

LOS ANGELES POLICE DEPARTMENT CRIMES BY REPORTING DISTRICT OF OCCURRENCE

PROJECT NAME: COMMUNITY RECYCLING AND RECOVERY

Types of	•		
Crime	1663	FOOTHILL	CITYWIDE
Burglary			
from Bus.	13	177	3,795
Burglary			
from Res.	4	4 17	13,499
Burglary			
Other	<u></u>	177	3,038
Street			
Robbery	1	239	10,072
Other			
Robbery	3	133	4,284
Murder	2	19	485
Rape	o	31	1,046
Aggravated			•
Assault	6	483	14,416
Burglary			
from Veh.	23	649	20,483
Theft from			
Vehicle	25	. 449	10,079
Grand			
Theft	30	345	11,819
Theft From			
Person	0	13	869
Purse			
Snatch	. 0	6	374
Other Theft	11	483	15,898
Vehicle			
Theft	46	1,116	26,209
Bunco.	.1	7	342
Bike ·	0	3	270
TOTAL	176	4747	136,978

CRIMES PER 1000 PERSONS

REPORTING DISTRICT	CRIMES	/	POPULATION X 1000	CRIMES PER 1000 PERSONS
FOOTHILL	4,747	,	187,680	25/1000
CITYWIDE	136,978	,	4,097,340	33/1000

^{*}All statistical information is based on 2006 Los Angeles Police Department Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 reports.

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX



DATE: 5/11/07

TO: Curtis Zacuto / Stacie Henderson

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 3

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TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comment from: (1) Raymond Seamans, -2 pages.



CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



1001 I STREET, SACRAMENTO, CALIFORNIA 95814* P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4026 (916) \$41-6000 • WWW.CIWMB.CA.GOV

RECEIVED CITY OF LOS ANGELES

MAY 11 2007

MARGO REID BROWN MBROWN@CIWMB.CA.GOV

(916) 341-6051

May 2, 2007

ENVIRONMENTAL UNIT

Mr. Jimmy Liao City of Los Angeles 200 North Spring Street, Room 750 Los Angeles, CA 90012

RECEIVED

MAY - 2 2007

STATE CLEARING HOUSE

Wesley Chesbro WCHESBRO@CIWMB.CA.GOV (915) 341-6039

JEFFREY DANZINGER JDANZINGER@CTWM9.CA.GOV (916) \$41-6024

Subject: SCH No. 2007041015: Notice of Preparation for a Draft Environmental Impact Report for Community Recycling and Recovery Solid Waste Facilities Permit (SWFP) No. 19-AR-0303, in Sun Valley (City of Los Angeles), County of Los Angeles

Dear Mr. Liao:

ROSALIE MULÉ RMULE@CIWMB.CA.GOV (916) \$41-6016

Thank you for allowing the California Integrated Waste Management Board's (CIWMB or Board) staff to review and provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

GARY PETERSEN GPETERSEN@CIWMB.CA.GOV (916) 341-6055

The Board's staff has reviewed the environmental document cited above and offers the following project description, analysis and our recommendations for the proposed project based on Board staff's understanding of the project. If the Board's project description varies substantially from the project as understood by the Lead Agency, the Board staff requests that the Lead Agency clarify any significant differences in the project description in the Draft Environmental Impact Report.



Project Description

The City of Los Augeles, Department of City Planning, acting as Lead Agency, has prepared and circulated a Notice of Preparation for Community Recycling and Recovery to modify the design and operation of its existing solid waste facility and recycling and resource recovery operation. Which will require the issuance and concurrence on a revised Solid Waste Facilities Permit?

The facility is located at 9143 to 9189 DeGarmo Avenue and 11300 West Pendleton Street in Sun Valley (City of Los Angeles). The proposed project will include the , following:

NOP Community Recycling and Recovery

May 2, 2007

- Construction of a 107,000 square foot enclosed building with an air filtration system
- Receive and process up to 2000 tons per day of construction material
- Receive and process up to 1500 tons per day of organics
- Receive and process up to 500 tons of food materials
- Receive and process up to 200 tons per day of wood materials
- Receive and process up to 2500 tons per day of solid waste for the transfer station and MRF
- An additional scale

CIWMB COMMENTS AND QUESTIONS

Due to the brevity of this Notice of Preparation Board staff has no comments at this time. Please refer to http://www.ciwmb.ca.gov/LEACentral/CEQA/transfer.htm for additional information to be included in the Draft Environmental Impact Report.

Board staff suggests that a discussion of SCAQMD Rule 410 and pertinent parts of AB 32—Global Warming Solutions Act be included in the Draft Environmental Impact Report, as you find appropriate.

Summary

The Board staff thanks the Lead Agency for the opportunity to review this Notice of Preparation. The Board staff requests copies of any subsequent environmental documents including; the Draft Environmental Impact Report, the Final Environmental Impact Report, any Statement of Overriding Considerations and Notices of Determination for this project.

Please refer to 14 CCR, § 15094(d) that states: "If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse]."

If you have any questions regarding this letter, please contact me at 916.341.6728 or email me at rseamans@ciwmb.ca.gov.

Sincerely,

Raymond M. Seamans

Permitting and Inspection Branch

Environmental Review

Permitting and Enforcement Division

California Integrated Waste Management Board

cc: Zane Poulson, Supervisor
Permitting and Inspection Branch
Permitting and Enforcement Division

CIWMB

Wayne Tsuda. Director City of Los Angeles Environmental Affairs Department 200 North Spring Street, Room 1905 MS 177 Los Angeles, CA 90012 May 1, 2007

Mr. Jimmy C. Liao City Planner/Project Coordinator Environmental Review Section Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012

Dear Mr. Liao:

Notice of Preparation of a Draft Environmental Impact Report for Community Recycling and Recovery

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Over the past five years, the operations at Community Recycling and Recovery has been the subject of hundreds of public nuisance complaints to the SCAQMD alleging odor and dust (visible emissions) and emissions causing a nuisance. These complaints and SCAQMD investigations have resulted in the issuance of 15 Notices of Violation (NOV) by SCAQMD to Community Recycling and Recovery. The majority of the NOVs were issued for odor nuisance complaints. The SCAQMD staff is concerned that increasing the tonnage of waste handled at this facility could lead to additional public nuisance complaints and potentially more NOVs issued if appropriate odor and dust management practices are not properly implemented. In October 2006, the SCAQMD Governing Board adopted Rule 410 - Odors from Transfer Stations and Material Recovery Facilities which requires submittal of an Odor Management Plan and possibly enclosure requirements depending on the size of the facility expansion. The SCAQMD staff recommends that the lead agency address the potential for odor and dust from the facility and include all feasible mitigations in the Draft EIR to prevent future public nuisance.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include,

but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA webpages at the following internet address:

www.aqmd.gov/ceqa/handbook/mitigation/MM intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Susan Nakamura Planning and Rules Manager Planning, Rule Development and Area Sources

SN:CB:li LAC070403-02LI Control Number

LOS ANGELES CITY PLANNING DEPARTMENT ENVIRONMENTAL REVIEW UNIT

200 N. Spring Street, Room 750 Los Angeles, CA 90012 FAX # (213) 978-1343

FAX

TO: Curtis Zacuto / Stacie Henderson

DATE: 5/3/07

COMPANY: Christopher A. Joseph & Associates

PHONE NUMBER: (818) 735-8858

FROM: Jimmy Liao

NUMBER OF PAGES: 5

Please Call If The Material You Received Was Incomplete or Illegible:

TELEPHONE NUMBER: (213)978-1331

MESSAGE: ENV-2006-6373-EIR (Community Recycling and Recovery)

NOP comment from: (1) Dave Singleton, Native American Heritage Commission - 4 pages.

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 657-5390 www.nahc.ca.gov ds_nahc@pachell.net



RECEIVED CITY OF LOS ANGELES

April 24, 2007

MAY 02 2007

ENVIRONMENTAL UNIT

Mr. Jimmy Liao
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012

Re: SCH# 2007041015 CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for Community Recycling and Recovery Project; City of Los Angeles, California

Dear Mr. Liao:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE),' and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the 'Information Center' nearest you is available from the State Office of Historic Preservation in Sacramento (916/653-7278). The record search will determine:

- If a part or the entire (APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have information on cultural resources in or near the APE. Please provide us site identification as follows: <u>USGS 7.5-minute quadrangle citation with name, township, range and section.</u> This will assist us with the SLF.
- Also, we recommend that you contact the Native American contacts on the attached list to get their input on the effect of potential project (e.g. APE) impact.
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{}$ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

 CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this

Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

1/0/

Sincerely,

Program Analyst

Cc: State Clearinghouse

Attachment List of Native American Contacts

Gabrieleno/Tongva Tribal Council

Anthony Morales, Chairperson

ChiefRBwife@aol.com

(626) 286-1758 - Home

(626) 286-1262 Fax

Gabrielino Tongva

Native American Contacts

Los Angeles County April 24, 2007

Fernandeno Tataviam Band of Mission Indians Randy Guzman-Folkes, Dir. Cultural and Environmental Department

601 South Brand Boulevard, Suite 102

Fernandeno

ced@tataviam.org

San Fernando , CA 91340 Tataviam

(818) 837-0794 Office (805) 501-5279 Cell

(818) 837-0796 Fax

LA City/County Native American Indian Comm

Ron Andrade, Director

3175 West 6th Street, Rm. 403

Los Angeles (213) 351-5324

- CA 90020

(213) 386-3995 FAX

Gabrielino/Tongva Council / Gabrielino Tongva Nation Sam Dunlap, Tribal Secretary

, CA 91778

761 Terminal Street; Bldg 1, 2nd floor Gabrielino Tongva , CA 90021

Los Angeles

PO Box 693

San Gabriel

(626) 286-1632

office @tongvatribe.net (213) 489-5001 - Officer

(909) 262-9351 - cell

(213) 489-5002 Fax

Tj'At Society Cindi Alvitre

Reseda

6602 Zelzah Avenue

CA 91335

calvitre@yahoo.com

Gabrielino

(714) 504-2468 Cell

Robert Dorame, Tribal Chair/Cultural Resources 5450 Slauson, Ave, Suite 151 PMB Gabrielino Tongva Culver City , CA 90230

Gabrielino Tongva Indians of California Tribal Council

gtongva@earthlink.net 562-761-6417 - voice

562-920-9449 - fax

Tongva Ancestral Territorial Tribal Nation John Tommy Rosas, Tribal Adminstrator 4712 Admiralty Way, Suite 172

Marina Del Rev . CA 90292

310-570-6567

Gabrielino Tongva

Malibu

Gabrielino Tongva Indians of California Tribal Council Mercedes Dorame, Tribal Administrator

20990 Las Flores Mesa Drive

Gabrielino Tongva , CA 90265

Pluto05@hotmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007041015; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for Community Recycling and Recovery Project; City of Los Angeles, California.

Fax: 213-978-1343

May 3 2007 16:30

P. 05

Native American Contacts
Los Angeles County
April 24, 2007

Carol A. Pulido 165 Mountainview Street Oak View , CA 93022 805-649-2743 (Home)

Chumash...

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007041015; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for Community Recycling and Recovery Project; City of Los Angeles, California.

I see no reason this project can't go forward.

We own commercial property at 9103 Norris Avenue, Sun Valley. We are in the construction business. We also are part owners in a residence approximately 3 miles away, off Sunland Blvd.

Why a city would even consider holding back a Recycling company is beyond my imagination.

We have lost dump site because material didn't use to be recycled - we have lost natural resources for the same reason.

Community Recycling and Recovery is located in an area of concrete and asphalt recycling plants, auto salvage plants, construction yards, medical waste processing plants and landfills.

- a.. The idea that this building may not be aesthetically pleasing in an area of landfills, junk yards, and other recycling plants is a joke.
- b.. Air quality will only be improved if the process is enclosed the volume will not matter. My experience is that concrete and asphalt recycling plants cause a lot more pollution than recycling of garbage, trees, construction debris etc.
- c.. Land use it has been a recycling plant for probably 30+ years.
- d.. Noise and Traffic we expected this type of noise and traffic when we invested in our property it is and has long been a place of high truck traffic due to all the above mentioned businesses. More trucks passing by my business, yes, but more tax dollars for Los Angeles and less cost for construction and trash pickup because it won't have to be trucked out of the city or out of the state.
- e.. I'm not sure about Storm Water Runoff but I don't see how that would be a problem. Whether the rain hits the top of a building or directly on the ground - is that different?

This is a good plan in my opinion.

Cordially,

Mary Saied

Dear Mr. Liao,

The East Valley Coalition offers the following comments on the proposed expansion of Community Recycling & Recovery located at 9143 and 9189 DeGarmo and 11300 Pendleton Street, Sun Valley.

- * During the scoping meeting held on April 17, 2007, it was evident the project description was inadequate and incomplete. The project description must include all elements of the operation, including FROG handling & storage, Truck flow, etc. Descriptions of operations were topical.
- * The EIR should be also be provided in Spanish as the Sun Valley area is predominantly populated with Spanish speaking residents. This allows for meaningful participation in the CEQA process.
- * A site plan review is required. How will this be addressed?

There must be an extensive review of Cumulative impacts. Sun Valley is already plagued with hazards and pollution from the extensive collection of waste industries, auto dismantlers, gravel pits, chrome plating, landfills, a power plant, and freeways. The current expansion proposals from Bradley Recycling & Transfer Station, American Waste Industries, Sun Valley Paper Stock, and Looney Bins must all be thoroughly scrutinized and considered in this DEIR. How will this be done? How will the EIR address the many waste industries located within an Environmental Justice Zone? How can such citing encourage other waste shed areas to responsibly and equitably handle their own waste?

- * Will this expansion further the blight of the community, the reduction in quality of life issues? Will property values go down? Will the rights of local residents to the peaceful and quiet enjoyment of their properties be affected by the increase in truck traffic?
- * Operating conditions Inspections must be held far more frequently than they currently are. During the scoping meeting Wayne Tsuda, Environmental Affairs, stated he had no idea that Community Recycling was involved in a pilot program with the City of L.A. that allowed it to take in

restaurant food waste. This has been going on for some time - all without a permit or oversight!

- * How many tpd of the restaurant pilot program? What are future plans for this food waste should the pilot program expand?
- * An inspection program needs to be funded by the local waste industries. Sun Valley requires a dedicated full-time inspector to ensure regulatory compliance.
- * Permits the proper permits are not in place for this type of operation.
- * Enclosed operations. All operations, including C&D, should be held in a 4 sided enclosure with rollup doors. If the operation poses an odor nuisance, than a negative pressurized system should be installed and utilizing a two stage carbon filtration system. The EIR should detail specifics about the odor control system. Using terms such as "State-of-the Art" does not provide the reader with a clear understanding of the system and therefore cannot adequately comment on it.

- * Conveyor belts will what kinds will be used, will there be noise or low rumblings? Will there be exhaust? Where will it go?
- * Garbage should not be allowed to remain on site for more than 48 hours. This reduces odors and vector problems. The time allowed for C&D materials should be reduced from 15 days to 10 days, with a rotation practice in place to prevent piles of older debris remaining stagnant. This would also reduce vector and odor problems.
- * Traffic/Vehicles Clean burning vehicles should be required of everyone doing business with Community Recycling. The negative impacts associated with an increase from the original 1700 tpd, to the current 5300 tpd to the proposed 7000 tpd is significant and must be thoroughly analyzed.
- * Where is the trash coming from and being hauled to? What are the routes? Off-site tracking is a big concern. Vehicle cleaning must be required, including undercarriage. The streets of Sun Valley are caked with dust that gets churned up with each passing truck. The dust vapor is present

daily. Thousands of trucks that arrive to Sun Valley hauling loads are filthy and add more dust vapor into our air. When analyzing traffic and air quality impacts, how is this considered?

Each trash hauling vehicle drops a certain amount of trash as they travel. All of them do. Multiply that by the thousands of trucks that pass through the Sun Valley streets, or the Sunland streets on their way to the Sun Valley sites. The Sun Valley & Sunland area freeways and off-ramps are also littered. I have driven behind hundreds of these trucks and every day I continue to witness the littering. A regular noncommercial vehicle could be stopped and the driver fined for this type of littering. Street sweeping for a mile around the site is a valuable mitigation measure, but does nothing to reduce the rest of the litter caused by these trucks. This needs

* Vehicle idling and queuing - There should be a maximum limit for vehicle idling time. Where will the trucks queue up? They should not be allowed to stack up on the street, nor park. For years we have seen this company monopolize the streets and disregard city code with their vehicles lined up in the streets and parked overnight.

to be addressed in the EIR.

- * Christopher and Joseph, the EIR preparers, should be required to use consistent measurement descriptions throughout the document. The information presented, a traffic analysis chart for example, should not be printed in smaller font than the rest of the document. The information should be presented so that the members of our community can see it, understand it and comment on it. This is a basic right as outlined by CEQA.
- * The project name and address should be singular and consistent.
 Currently this business operates using different names and addresses. This creates potential for piecemealing and lax oversight and regulation.
- * Will there be adequate storm drains and rain water collection basins in place?
- * Visual Impacts At the scoping meeting we were informed there would be 25 foot walls surrounding the facility to mask the garbage. This wall and any structure could be attractively designed and landscaped as to minimize and mask its garbage fortress appearance from nearby residential

homes, the freeway and Shadow Hills foothill homes.

- * What kind of wall is this 25 foot perimeter wall? It needs to be a heavily reinforced block wall.
- * Mitigation measures A business that would so heavily impact a community needs to give back to the community. Road cleanup, road repairs, tree planting & community beautification programs, sidewalk/lighting, health studies funding, etc.

East Valley Coalition appreciates the opportunity to comment on the proposed project. We are concerned about the continued expansion of the cluster of polluting industries in Sun Valley. East Valley Coalition is committed to changing the environment of our community to a healthy, beautiful place to live and raise our children.

Sincerely,

Cynthia Despres, President

East Valley Coalition, Member of One-LA (I.A.F.)