



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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[Adam.Villani@lacity.org](mailto:Adam.Villani@lacity.org)

Mr. Adam Villani, Environmental Review Coordinator  
Community Development Department  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles CA 90012

## **Final Environmental Impact Report (Final EIR) for the Proposed Community Recycling and Resource Recovery Facility in Sun Valley (SCH No. 2007041015)**

On August 14, 2009 the SCAQMD staff commented on the Draft Environmental Impact Report for the proposed Community Recycling and Resource Recovery Facility in Sun Valley (SCH No. 2007041015). The lead agency subsequently responded to our comments, and a copy of the response to comments was provided to the AQMD staff as part of the Final EIR. We note that since our comment letter was sent in 2009, there have been 81 complaints of odors and dust from this facility. We encourage the lead agency and the applicant to ensure that this project will address the issues behind these complaints.

In addition, while many of the SCAQMD staff comments were addressed in Final EIR, the SCAQMD staff still has concerns that the project specific air quality impacts were not estimated or documented consistent with the proposed increase from 4,600 tons per day to 6,700 tons per day of throughput. The lead agency states that operational emission estimates were recalculated after its own reevaluation during the public review period. The agency's findings are included in tables shown on pages II-18 and II-19 showing a significant decrease in regional air quality emission estimated from the previous analysis. The lead agency explained on page II-18 that the only regional increase in on-road vehicle emissions would result from the increase in employees at the site but did not provide substantial evidence to document its claims. Without substantial evidence and documentation of these estimates including the methodologies used, assumptions, equations, emission factors, etc., the SCAQMD staff does not believe that the lead agency has demonstrated that project air quality and health effect impacts are less than significant. As requested in our previous comments, the Final EIR should include existing and estimated future daily vehicle trips and vehicles miles traveled by vehicle type, e.g., self-haul passenger vehicles, refuse collection trucks, transfer trucks, etc. that will handle the proposed 2,100 tons per day of increased throughput for localized and regional impacts. These estimates should then be compared with recognized significance thresholds and mitigation should be required if significant.

Mr. Adam Villani,  
Environmental Review Coordinator

2

March 7, 2013

Finally, the lead agency is reminded that the proposed project will have to comply with applicable SCAQMD rules and regulations previously stated in our previous comments to address fugitive dust, odors and other concerns. Questions concerning permit requirements can be addressed to SCAQMD engineering and compliance staff at (909) 396-2684.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:CT:AD:GM

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