

**FINAL INITIAL STUDY/MITIGATED NEGATIVE
DECLARATION**

**UNIVERSAL WASTE SYSTEMS, INC.
24TH STREET TRANSFER STATION**

**2460 - 2440 E. 24TH STREET, AND 2465 E. 25TH STREET
LOS ANGELES, CALIFORNIA 90058**

SCH No. 2016081074

Lead Agency:

City of Los Angeles Local Enforcement Agency
3550 Wilshire Blvd., 18th Floor
Los Angeles, California 90010
(213) 252-3348

November 2016

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1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed UWS, Inc. 24th Street Transfer Station Project (hereinafter referred to as the “Project”) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (IS/MND) (SCH No. 2016081074) dated August 2016.

Section 15074(b) of the CEQA Guidelines states that, prior to approving a project, the lead agency must consider the proposed IS/MND together with any comments received during the public review process. The lead agency must adopt the proposed IS/MND, only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project would have a significant effect on the environment and that the IS/MND reflects the lead agency’s independent judgment and analysis. Section 2.0, Response to Comments, includes all letters received during the 30-day public review period, as well as written responses to all comments received. Section 3.0, Errata, includes revisions to the text of the IS/MND either in response to a comment or in order to clarify information.

Section 15074(d) of the CEQA Guidelines states that, when adopting an MND, the lead agency shall adopt a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to reduce or avoid significant environmental effects. Section 4.0, Mitigation Monitoring and Reporting Program (MMRP), describes the mitigation program to be implemented by the project developer.

1.1 CEQA AND PUBLIC REVIEW OF THE DRAFT IS/MND

In accordance with Section 15073 of the CEQA Guidelines, a Negative Declaration (ND) or MND must be subject to a 30-day public review period when submitted to the State Clearinghouse for review by state agencies. As such, the Draft IS/MND was made available for public review from Thursday, September 1, 2016 through Friday, September 30, 2016. Consistent with Sections 15072(b) and 15072(d) of the CEQA Guidelines, the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) was published in the Downtown News and is on file at the Los Angeles County Registrar Recorder/County Clerk in the City of Norwalk. The Draft IS/MND and NOI or the NOI only was provided to responsible agencies and interested groups; and was made available for review at the City of Los Angeles Local Enforcement Agency in Los Angeles and the Robert Louis Stevenson Branch Library during business hours.

The City of Los Angeles Local Enforcement Agency (LEA) has reviewed all comments received from agencies, organizations and/or individuals related to the subject IS/MND to determine whether any substantial new environmental issues have been raised. Based on the evaluation in the Draft IS/MND together with all comments received, the LEA has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft IS/MND and/or in the Responses to Comments, Errata, and Mitigation Monitoring and Reporting Program. All potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant

mitigation measures, where applicable. Therefore, the proposed Project would not result in any significant impacts, and a Mitigated Negative Declaration in accordance with CEQA is the appropriate environmental document for the proposed Project.

This document, combined with the Draft IS/MND, constitutes the Final IS/MND for the proposed UWS, Inc. 24th Street Transfer Station Project. This document includes all public comment letters; responses; and the State Clearinghouse letter that documents compliance with CEQA review requirements. The LEA will consider the proposed IS/MND together with the comments received during the public review process, and adopt the UWS, Inc. 24th Street Transfer Station Project Final IS/MND and file a Notice of Determination prior to formal review of the Solid Waste Facility Permit application.

1.2 PROJECT DESCRIPTION SUMMARY

1.2.1 PROJECT LOCATION AND SETTING

The proposed project site is located at 2460 through 2440 East 24th Street and 2465 East 25th Street in the City of Los Angeles, California and within the City of Los Angeles Northeast Community Plan Area. The area can be characterized as being highly urbanized in nature, consisting of industrial, commercial and warehouse businesses as well and an artist live/work colony.

Regional access to and from the project site is available from the 10 (Santa Monica) Freeway via on and off ramps located on Alameda Street or Santa Fe Avenue/Mateo Street, the 110 (Harbor) Freeway via Vernon Avenue or the 710 (Long Beach) Freeway via E. Washington Boulevard. Local access to the site is available via Santa Fe Avenue to East 25th Street and Minerva Street, via Soto Street to East 26th Street, or via Washington Boulevard to East 23rd Street to Minerva Street to East 24th Street. Washington Boulevard and Santa Fe Blvd are major truck routes and East 23rd, Minerva Street, and East 24th Street are all local streets that serve industrial businesses in the area. East 24th Street terminates east of the project site.

1.2.2 PROPOSED PROJECT

The project site is currently occupied by Universal Waste Systems (UWS), Inc., and used for parking the company's refuse collection vehicles, compressed natural gas (CNG) refueling of those vehicles, vehicle maintenance, offices, and operation of a 150 TPD Direct Transfer Facility (DTF) solid waste facility (reference SWFP 19-AR-1251) and a 15 TPD Limited Volume Transfer Operation (LVTO) solid waste facility (reference SWFP 19-AR-1253).

The proposed project entails construction of a one-story/ up to 50' +/- tall, 30,000 square foot (sf) solid waste transfer station building and application for a 1,000 ton per day (TPD) Solid Waste Facility Permit (SWFP) on approximately 1.3 acres. The collection truck yard will be relocated to another UWS property, and approximately 6,500 square feet of existing office and truck maintenance floor area will be demolished to accommodate the proposed project. Existing solid waste operations will be relocated to other permitted facilities during the construction process.

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

UWS 24th Street Transfer Station

The requested SWFP will increase the permitted amount of material processed and transferred at the facility from 165 TPD to a maximum of 1,000 TPD. A new Large Volume Solid Waste Facility Permit will be obtained to operate the 1,000 TPD transfer station.

2.0 RESPONSES TO COMMENTS

Letters commenting on the information and analysis in the Draft IS/MND were received from the parties listed below during the 30-day public review period which ran from Thursday, September 1, 2016 through Friday, September 30, 2016.

State Agencies

- California Department of Transportation, District 7 (Caltrans), September 19, 2016
- Department of Resources Recycling and Recovery (CalRecycle), September 29, 2016
- State Clearinghouse and Planning Unit (SCH), September 30, 2016

Local Agencies

- None

Organizations

- Santa Fe Arts Colony, Leonard Skuro, Co-Owner Santa Fe Art Colony, September 23, 2016.
- The 24th and 25th E. Street, Los Angeles, California Neighborhood, September 2016.

Individuals

- None

Each letter listed above is included in this document, followed by the response to each comment. Each comment letter has been divided into sequential numbered comments (e.g., 1, 2, 3), as shown on the enclosed letters. Each numbered comment corresponds to a matching numbered response.

2.1 STATE AGENCIES

- California Department of Transportation, District 7 (Caltrans), September 19, 2016
- Department of Resources Recycling and Recovery (CalRecycle), September 29, 2016
- State Clearinghouse and Planning Unit (SCH), September 30, 2016

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov



Serious Drought.
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9/29/16
E

September 19, 2016

Governor's Office of Planning & Research

SFP 20 2016

STATE CLEARINGHOUSE

Mr. Jose Gutierrez
City of Los Angeles, Dept. of Building and Safety
3550 Wilshire Boulevard, 18th Floor
Los Angeles, CA 90010

RE: UWS 24th Street Transfer
Station Project
Vic. LA-10/PM: 17.493
SCH # 2016081074
GTS# LA-2016-00131

Dear Mr. Gutierrez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the construction and operation of a one-story, 30,000 square foot solid waste transfer station and application for a 1,000 ton per day (TPD) Solid Waste Facility Permit at 2440 24th Street and 2465 25th Street.

The nearest State facilities to the proposed project are Interstates 5 and 10. Caltrans does not expect the project approval to result in a direct adverse impact to existing State transportation facilities.

In the spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Severin Martinez, at (213)-897-0067 or electronically at severin.martinez@dot.ca.gov and refer to IGR GTS# LA-2016-00131.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"

2.1.1 CALIFORNIA DEPARTMENT OF TRANSPORTATION (CAL TRANS)

September 19, 2016

Response CalTrans-1

This comment letter acknowledges the receipt of the Draft IS/MND and that CalTrans does not expect project approval to result in a direct adverse impact to existing State transportation facilities.

California Environmental Protection Agency

Edmund G. Brown Jr., Governor



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. Box 4025, SACRAMENTO, CALIFORNIA 95812

September 29, 2016

*Clear
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Governor's Office of Planning & Research

SEP 29 2016

STATE CLEARINGHOUSE

Jose Gutierrez, Program Supervisor
City of Los Angeles
Department of Building and Safety
Local Enforcement Agency (LEA)
3550 Wilshire Boulevard, 18th Floor
Los Angeles, CA 90010

Subject: SCH No. 2016081074 –Draft Initial Study/Mitigated Negative Declaration for Universal Waste Systems, Inc. 24th Street Large Volume Solid Waste Transfer Station – City of Los Angeles

Dear Mr. Gutierrez:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The City of Los Angeles Department of Building and Safety, Solid Waste Local Enforcement Agency (LEA), acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of a Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed project entails construction and operation of a one story 50 foot tall, 30,000 square foot solid waste transfer station and application for a new 1,000 ton per day (TPD) Full Solid Waste Facility Permit (SWFP) located at 2440-2460 E. 24th Street and 2465 E. 25th Street within the City of Los Angeles. The project site is approximately 1.3 acres, and the site is currently zoned for M-3, Heavy Industrial Zone. The property is located in a heavy industrial area surrounded by other properties occupied by industrial uses and is just 2.5 miles south of downtown. The Los Angeles River is located 1,430 feet east of the facility. The project site is currently used for parking company refuse collection vehicles, compressed natural gas refueling of those vehicles, vehicle maintenance, offices, and operation of a 150 TPD Direct Transfer Facility (19-AR-1251) and a 15 TPD Limited Volume Transfer Operation (19-AR-1253). The existing registration permit and notification will be combined into the new 1,000 TPD full SWFP. The proposed transfer station building will include food waste processing equipment, an at-grade, load-out area, push walls, a tipping area which can accommodate multiple collection vehicles, a hazmat locker, and separate ingress/egress points for collection and transfer trucks. A 45-foot long automated truck scale and radiation detector will also be included on Parcel 1. Parcel 2 is approximately 11,600 square feet in area and will be developed with offices, a break room, restrooms, and parking are also proposed. The facility will operate up to 24 hours per day, seven days a week.

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/MND, in addition to the specific location noted.

Comments for the Draft IS/MND are summarized in the following table:

♻️
ORIGINAL PRINTED ON 100% POST-CONSUMER CONTENT, PROCESSED CHLORINE FREE PAPER

NOC/Draft IS/MND for Universal Waste Systems, Inc.
 September 29, 2016
 Page 2 of 3

Chapter/Section	Page and Location	Comment
1 IS/MND Section 1. Introduction	Pg. 1 3 rd paragraph	The first sentence states "the requested 1,000 TPD (tons per day) SWFP will increase the permitted amount of material processed and transferred at the facility from 165 TPD to maximum of 1,000 TPD." The 165 TPD is referring to a combined tonnage of both facilities (19-AR-1251 and 19-AR-1253), whereas both of those facilities are separate and operated independently of each other. The allowed tonnage is not combined. Each activity is separately regulated at 150 TPD for 19-AR-1251 and 15 TPD for 19-AR-1253.
2 Section 2. Project Information 2.12 Other Agencies Whose Approval is Required	Pg. 10 Last paragraph	It is stated "the proposed project will require issuance of a revised full Solid Waste Facility Permit from the local enforcement agency." This facility does not have a full solid waste permit that could be revised, the existing permits are under the registration tier (19-AR-1251) and Enforcement Agency notification tier (19-AR-1253). The proposed project will have to apply for a new full SWFP.
3 Section 3. CEQA Environmental Checklist 3.3 Air Quality	Pg. 22 Subsection e. 4 th bullet point	The last bullet point has an incomplete sentence. I believe additional informational was meant to be added.
4 Section 3. CEQA Environmental Checklist 3.6 Geology and Soils	Pg. 27 Subsection b.	It is stated that no new construction is proposed yet one of the main project proposals is the construction of a 30,000 square foot building. This section, as well as other applicable sections, should be revised to adequately assess the impacts of constructing a new building.
5 Appendix B Draft Transfer Processing Report (TPR)	General Comment	Constructing a new 30,000 square foot transfer station is discussed throughout the IS/MND document but there is no discussion of how constructing the building will be staged and how that will effect existing operations throughout the transition. Please explain how the building will be constructed, a time frame of how long it take to build, and how measures will be taken to not disrupt ongoing operations.
6 3.1.2 Staging Areas	Pg. 12 Last paragraph	Specifically state how long the processed food waste will be stored into tanks, also define how often "Periodically, a 5,000-gal tank will collect the slurry" means. This can also be further discussed on page 17 under section 3.2.7 De-Packaging System.
7 3.1.6 Surface Drainage and Runoff Control Plan	Pg. 13	Specifically describe how the facility will be "completing both construction and general industrial storm water pollution prevention and mitigation program plans."
8 3.2.3 Transfer Station Tipping Area	Pg. 14	The last sentence of the first paragraph states "approximately 1,85 cubic yards (cy) of material on the tipping floor"; if that is a typo please fix to the correct number.
9 3.2.7 De-Packaging System	Pg. 17	Specifically explain how the food waste will be kept separate from the other waste streams, how it will be stored and storage time frames prior to processing in

NOC/Draft IS/MND for Universal Waste Systems, Inc.
 September 29, 2016
 Page 3 of 3

	9		the de-packaging system, and lastly how it will be stored and storage time frames after being processed.
	10	Pg. 25 5.7.8 Protection of Users	This section is titled Protection of Users, yet discusses how the facility will eliminate cross traffic, please revise this section to describe how contact between the public and solid waste will be minimized. This discussion on traffic could be included on Page 12 in 3.1.4 Traffic Plan.
11		Pg. 1 2 nd paragraph	This document should be referred to as an Alternative Odor Management Plan per the South Coast Air Quality Management District Rule 410, not an Odor Impact Minimization Plan. The LEA does not have authority over odor at transfer stations. The design capacity in this section is stated as 1,500 TPD, yet in the TPR the design capacity is stated as 2,000 TPD. Please consistently state what the correct design capacity is throughout the entire document.

12 **Solid Waste Regulatory Oversight**
 The LEA and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities, including transfer processing facilities, relative to permitting and inspections. The permitting and regulatory requirements for transfer processing are contained in Title 14, California Code of Regulations (CCR) and Title 27 CCR.

13 **CONCLUSION**
 CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the IS/MND and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at megan.emslander@calrecycle.ca.gov.

Sincerely,



Megan Emslander, Environmental Scientist
 Permitting and Assistance Branch – South Unit
 Waste Permitting, Compliance and Mitigation Division
 CalRecycle

cc: Virginia Rosales, Supervisor
 Permitting and Assistance Branch – South Unit

2.1.2 CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY (CALRECYCLE)

September 29, 2016

Response Cal Recycle-1

As correctly noted, for purposes of enforcing solid waste regulations, as well as for reporting requirements, there are two separate solid waste facility permits currently associated with operations at the project site. For purposes of setting baseline environmental conditions, and determining the project's potential environmental impacts, the total amount solid waste currently processed at the site was taken into account.

Response Cal Recycle-2

Comment noted. The applicant will apply for a full solid waste facility permit from the Local Enforcement Agency and CalRecycle.

Response Cal Recycle-3

The fourth bullet point was intended to be the last bullet point. No additional bullet points are proposed.

Response Cal Recycle-4

The analysis of the project's impact on soil erosion/loss of topsoil in the Draft IS/MND, as noted by the commentator, incorrectly indicates that "no new construction is proposed". This will be noted in the errata section of this Final IS/MND. It should also be noted that construction of a 30,000 square foot transfer building was included in the project description and analyzed in the air quality, aesthetics and soils and geology sections "a" and "d" of the Draft IS/MND.

In regard to Section 3.6, Geology and Soils, subsection b, on page 27 of the Draft IS/MND, the project will in fact involve construction of a 30,000 square foot building that will require grading and excavation. This error will be noted in Section 3, Errata. Compliance with the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) from the State Water Resources Control Board and development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD) will reduce potential storm water impacts associated with construction to less than significant levels.

Response Cal Recycle-5

This comment is related to the draft Transfer Processing Report (TPR) which was included as Appendix B of the Draft IS/MND. In response to the comment requesting a discussion of how construction of the proposed building will be staged and how it will affect existing operations, the project will not be phased. Existing operations will be shifted to other locations and permitted solid

waste facilities prior to starting construction of the new 30,000 sf transfer station building. The new building will be constructed in one phase over 12 to 18 months.

Response Cal Recycle-6

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. The storage tanks will actually have a capacity of 7,500 gallons and when the facility is running at full capacity will be emptied everyday by a tanker truck. During initial startup of foodwaste processing the collection tanks will be emptied between three and five times a week. The foodwaste slurry is acidic, with a pH of 2-3, so it is not putrescible, and does not generate gas so there is no odor regardless of how long the material sits in the tanks which are fully enclosed. This information will be included in the TPR submitted as part of the solid waste facility permit application.

Response Cal Recycle-7

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. Prior to obtaining building permits for the proposed project a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) will be obtained. Construction activity subject to this permit include clearing, grading and disturbances to the ground including stockpiling, or excavation of soils.

The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD). Standard erosion control Best Management Practices (BMPs) such as covering stockpiled soil, use of silt fences and sedimentation basins will be employed.

The proposed project will also be required to obtain a General Permit for Storm Water Discharges Associated with Industrial Activities which requires preparation of a Storm Water Pollution Prevention Plan, storm water sampling and testing and filing annual reports. Since all solid waste transfer and handling operations will be conducted inside a building, the potential for storm water contamination resulting from contact with solid waste is minimal. An industrial wastewater permit will be obtained to connect any floor drains/clarifiers to the sanitary sewer system

Information on the facility's compliance with the General Industrial Stormwater permit and best management practices will be included in the TPR submitted as part of the solid waste facility permit application.

Response Cal Recycle-8

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. There is a typo on page 14, under Section 3.2.3 Transfer Station Tipping Area. The last sentence of the first paragraph states "approximately 1,85 cubic yards (cy) of material can be accommodated on the tipping floor"; and the correct number should be "1,179" cy. This error will be noted in Section 3, Errata, and will be included in the TPR submitted with the Solid Waste Facility Permit application.

Response Cal Recycle-9

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. Subsection 3.2.7, “De-Packaging System” on page 17, will be amended to include a statement that foodwaste will be tipped in a dedicated bunker that is separate from the main tipping floor and will typically be processed through the de-packaging system the same day it is received. In any case, all material tipped at the facility will comply with the 48 hour removal requirements set forth under Title 14 CCR, Section 17410.1.

Response Cal Recycle-10

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. Under subsection 5.7.8 on page 25, “Protection of Users” a discussion of how the facility will eliminate cross traffic is included, but also includes references the use of signage, which will contain facility rules, procedures, and speed limits, as well as the use of spotters, which will collectively protect users of the facility. The fact that the facility will be used primarily by private collection companies with professional commercial drivers will further protect users of the facility. This revised discussion will also be included in subsection 3.1.4 “Traffic Plan” on page 12 of the TPR.

Response Cal Recycle-11

This comment is related to the draft TPR which was included as Appendix B of the Draft IS/MND. Appendix C of the TPR will be revised and renamed as an Alternative Odor Management Plan per the South Coast Air Minimization Plan Quality Management District Rule 410, not an Odor Impact Minimization Plan. In addition, the permitted and design capacity will be revised so that it is consistent throughout the document. The permitted capacity at the facility will be 1,000 tons per day and the design capacity will be 2,000 tons per day.

Response Cal Recycle-12

Comment noted. A Solid Waste Facility Permit application will be filed with the LEA and CalRecycle for a large volume solid waste facility.

Response Cal Recycle-13

Comment noted. This comment letter thanks the lead agency for the opportunity to review and comment on the Draft IS/MND, request copies of any subsequent environmental documents, public notices and notices of determination, and requests 10 days advance notice of any public hearings that will consider adoption of the environmental document.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 30, 2016

Jose Gutierrez
City of Los Angeles
3550 Wilshire Blvd, 18th Floor
Los Angeles, CA 90010

Subject: UWS 24th Street Transfer Station Project
SCH#: 2016081074

Déar Jose Gutierrez:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 29, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016081074
Project Title UWS 24th Street Transfer Station Project
Lead Agency Los Angeles, City of

Type MND Mitigated Negative Declaration

Description The proposed project entails construction and operation of a one story/50' +/- tall, 30,000 sf solid waste transfer station and application for a 1,000 ton per day solid waste facility permit on approximately 1.3 acres (two separate parcels) located at 2440-2460 E. 24th St and 2465 E. 25th St in the City of LA. Parcel 1 is approximately 46,000 sf in area, and will be developed with the transfer station building which will include an at grade load out area, a tipping area which can accommodate multiple collection vehicles, a hazmat locker, and separate ingress/egress points for collection and transfer trucks. A 45 ft long automated scale will also be included on parcel 1. The project may also include food waste processing equipment. Parcel 2 is approximately 11,600 sf in area and will be developed offices and parking.

Lead Agency Contact

Name Jose Gutierrez
Agency City of Los Angeles
Phone 213-252-3348 **Fax**
email
Address 3550 Wilshire Blvd, 18th Floor
City Los Angeles **State** CA **Zip** 90010

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 00' 57.45" N / 118° 13' 44.59" W
Cross Streets Minerva St and Santa Fe Ave
Parcel No. 5168-021-004, 005, 010
Township 2S **Range** 13W **Section** 10 **Base** SB

Proximity to:

Highways 10/5 Freeways
Airports
Railways 1
Waterways LA River
Schools 10
Land Use M-3, Heavy industrial zone

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 08/31/2016 **Start of Review** 08/31/2016 **End of Review** 09/29/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

2.1.3 CALIFORNIA STATE CLEARINGHOUSE AND PLANNING UNIT (SCH)

September 30, 2016

Response SCH-1

This comment letter acknowledges the receipt of the Draft IS/MND and that the LEA has complied with the SCH review requirements.

2.2 ORGANIZATIONS

- Santa Fe Arts Colony, Leonard Skuro, Co-Owner Santa Fe Art Colony, September 23, 2016.
- The 24th and 25th E. Street, Los Angeles, California Neighborhood, September 2016.



Santa Fe Art Colony

September 23, 2016
Jose Gutierrez
City of Los Angeles Department of Building and Safety Local Enforcement Agency
3550 Wilshire Blvd. 18th Fl
Los Angeles, CA 90010

Mr. Gutierrez,

I am writing you in regards to the Draft Initial Study/Mitigated Negative Declaration for the project of the Universal Waste Systems Inc. and their proposed site located at 2440-2460 E 24th St/2465 E 25th St. Los Angeles, CA 90058. On behalf of the Santa Fe Art Colony, there are some issues the community takes with the IS/MND.

Zoning (2.7):

1 Although the IS/MND holds that the UWS Inc. shall not be located within 1,000 ft of a residential property, it also concedes that the Santa Fe Art Colony is 400 ft away. The Santa Fe Art Colony has been approved for work/live space as a residential property that has been in the area for over 30 years.

Air Quality (3.3)

2 The IS/MND states that the facility would have “No Impact” on the air quality plan in the area, however, there are predictions of significant levels of PM10 attributed to the excavator and total equipment emissions. This influx of emissions from this proposal would aggravate the already poor air quality that is the result of emissions from sources such as the nearby train, Security Paving Inc. SoCal Recycling Industries. Any additional pollutants would raise the emissions to standards far below acceptable for an area that houses so many residential properties and retail facilities.

Noise (3.11)

3 The area already is subject to the nuisance of noise from surrounding facilities, to limit this problem, we would suggest there be a constraint on hours of operation, in order to prevent noise during the night that presents a disturbance to the residential properties nearby.

Transportation/Traffic (3.15)

4 There needs to be a brand new traffic study implemented based on increases in traffic due to the surrounding businesses such as: Security Paving Inc. SoCal Recycling Industries, UPS facility, Vidal Produce, City Fibers Inc. All of which are located less than 1,000 ft from the Universal Waste Systems Inc. property.

-Additionally, the poorly drafted traffic plan has the potential to cause disruption of rail traffic which could present an economic hardship to LA.

5 **Odor Management Plan**
Due to the extremely close proximity the site is to the Art Colony, we propose there be at least a 30ft wall build to minimize the odors, particularly in the morning when the wind blows East to West. This will also help prevent the potential of any dangerous sludge that could occur if it rains, due to drainage, which could in turn affect the owners and residents of the Santa Fe Art Colony.

Sincerely,
Leonard Skuro
Co-Owner
Santa Fe Art Colony

2.2.1 SANTA FE ART COLONY (SFAC)

September 23, 2016

Response SFAC-1

The proposed project will function more like a transfer station than a recycling facility. It is anticipated that the majority of the 1,000 TPD of material delivered to the facility will be solid waste which will be tipped inside the proposed building by collection trucks and loaded into transfer trucks on a first in, first out, basis. There will be also be foodwaste/organics delivered to the facility which will be processed to remove contaminants and stored as a slurry onsite in completely enclosed tanks until removed by a tanker truck. The foodwaste component could be classified as recyclable materials processing.

The proposed transfer station project component would be consistent with the City of Los Angeles zoning code and is considered a “by-right” use in the M3 zone under Zoning Administrator Case No. ZA2015-2348(ZAI), Zoning Administrator’s Interpretation – Lists of Uses Permitted in Various Zones.

The proposed foodwaste “recycling” component of the project would also be consistent with the City of Los Angeles zoning code requirements. Under the zoning code, “recycling materials processing and sorting facilities” must be located 1,000 feet from a residentially zoned property. While the Santa Fe Art Colony is 400 feet from the project site, the property is zoned M3-1 and originally required a conditional use permit in order to be located in the M3-1 zone (reference City Planning Case ZA-1986-404-CUZ).

Response SFAC-2

The IS/MND indicates that the facility would have “No Impact” on the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). The Draft IS/MND does acknowledge that there will be short term air quality impacts related to construction as well as long-term impacts related to operation of the facility and that both construction related and operational emissions will be less than the maximum daily thresholds.

As set forth in the Draft IS/MND, there are two consistency criteria that should be referred to in determining a project’s conformity with the AQMP. Consistency Criteria 1 refers to a project’s potential for resulting in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation. Consistency Criteria 2 refers to a project’s potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP’s implementation.

Regarding “Consistency Criteria 1”, the proposed project will not result in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation because collection trucks, which are and will be the primary vehicles using the facility, are required to comply with the solid waste collection vehicle (SWCV) rule which was adopted by the California Air Resources Board in 2004. This rule applies to all diesel powered SWCVs more than 14,000 pounds in weight with engines more than 7 years old (before

2006) that collect waste for a fee. All vehicles subject to the SWCV rule are required to reduce smoke from 100% of tier 1 engines and 60% of tier 2 engines. Eventually all of the collection vehicles involved in commercial solid waste collection will use compressed natural gas (CNG), thus meeting these requirements. In addition, diesel fueled transfer trucks and off-road equipment used as part of the facility operation are also subject to increased emission controls and regulations as older engines are phased out and replaced with newer models.

Regarding “Consistency Criteria 2”, the proposed project will not result in any significant adverse impacts related to the implementation of the AQMP as the project will not adversely affect any regional population, housing, and employment projections prepared for the City by SCAG. The project will reduce the number of UWS, Inc. employees on the site from approximately 25 to 14. The existing jobs associated with the collection route drivers and associated administrative personnel will be relocated to other UWS, Inc. facilities. As a result, the proposed project would not be in conflict with, or result in an obstruction of, the applicable 2007 AQMP.

The following additional mitigation measure is proposed to reduce air emissions including PM10 and NOx emissions related to construction and onsite operations:

- Off-road diesel powered equipment, such as loaders and excavators, shall use Tier 3 or 4 engines which shall employ the Best Available Control Technology/diesel particulate filters.
- All diesel engines shall be shut off when not in use to reduce emissions from idling.

Since emissions from equipment and vehicles associated with the project’s construction and operation will be below the established significance thresholds (see Tables 1 on page 18 and Table 2 on page 19 of the Draft IS/MND), and with adoption of the proposed mitigation measures, air quality impacts are anticipated to be less than significant.

Response SFAC-3

The project area is subject to noise from surrounding manufacturing and trucking facilities as well from street traffic and railroad lines. The project site as well as surrounding properties are located in a heavy industrial (M-3) zone, and businesses are permitted to operate 24 hours a day, seven days a week if they are located at least 1,000 feet from any A, R, C, PB, MR or MI zoned properties. In addition, all proposed solid waste operations will be conducted within an enclosed building which will minimize the potential for noise impacts. Finally, the facility operator will endeavor to conduct noisy operations between the hours of 7:00 a.m. and 8:00 pm, and will post contact information outside the facility to report any complaints regarding noise or operating issues that might affect surrounding property owners, tenants or residents.

Response SFAC-4

Per the City of Los Angeles Department of Transportation’s “Traffic Study Policies and Procedures”, proposed projects that meet the following thresholds will require either a focused traffic analysis or a full traffic study:¹

- 25 to 42 increase in net peak trips – LADOT requires a technical analysis to determine potential traffic impacts and mitigations.
- 43+ increase in net peak trips – LADOT requires a traffic study by a licensed traffic engineer.

As shown in the “Project Trip Generation Estimates” table below, the proposed project will generate 14 AM peak hour trips and 7 PM peak hour trips per day which are below the LADOT thresholds for additional traffic analysis.

Project Trip Generation Estimates									
Land Use/Vehicle Type	Daily			AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
EXISTING TRANSFER STATION (165 TPD)									
Employee Vehicles	36	36	72	4	0	4	0	12	12
Collection Trucks	44	44	88	1	1	2	7	0	7
Transfer Trucks	11	8	19	1	1	2	1	0	1
Total	91	88	179	6	2	8	8	12	20
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	36	36	72	4	0	4	0	12	12
Collection Trucks (2.0 PCE)	88	88	176	2	2	4	14	0	14
Transfer Trucks (3.0 PCE)	33	24	57	3	3	6	3	0	3
Total w/ PCE	157	148	305	9	5	14	17	12	29
PROPOSED TRANSFER STATION (1,000 TPD)									
Employee Vehicles	7	7	14	0	0	0	0	0	0
Collection Trucks	125	125	250	4	4	8	6	6	12
Transfer Trucks	44	44	88	2	2	4	2	2	4
Total	176	176	352	6	6	12	8	8	16
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	14	14	28	0	0	0	0	0	0
Collection Trucks (2.0 PCE)	250	250	500	8	8	16	12	12	24
Transfer Trucks (3.0 PCE)	132	132	264	6	6	12	6	6	12
Total w/ PCE	396	396	792	14	14	28	18	18	36
NET TRIP GENERATION (Proposed - Existing)									
Employee Vehicles	-29	-29	-58	-4	0	-4	0	-12	-12
Collection Trucks	81	81	162	3	3	6	-1	6	5
Transfer Trucks	33	36	69	1	1	2	1	2	3
Total	85	88	173	0	4	4	0	-4	-4
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	-22	-22	-44	-4	0	-4	0	-12	-12
Collection Trucks (2.0 PCE)	162	162	324	6	6	12	-2	12	10
Transfer Trucks (3.0 PCE)	99	108	207	3	3	6	3	6	9
Total w/ PCE	239	248	487	5	9	14	1	6	7

Note:
Trip generation estimates provided by UWS for operation of the Existing and Proposed facilities.

The traffic totals from the table indicate the number of passenger-cars and pickup trucks; two-axle medium duty trucks (collection trucks and other similarly sized trucks); and three+ axle heavy duty trucks (transfer trucks) associated with the existing and proposed operations at the site. The

¹ LADOT, “Traffic Study Policies and Procedures, August 2014, page 5.

collection and transfer truck trips were increased using passenger-car equivalence factors (PCEs) in order to provide a better representation of their impacts on total and peak hour traffic counts.

It should also be noted that the potential project related traffic impacts will be further reduced by the fact that the proposed project will generate traffic throughout the day, and the fact that collection truck routes will be scheduled in order to avoid peak traffic periods on local streets.

Response SFAC-5

While the project site is in close proximity to the Santa Fe Art Colony, constructing a 30 ft wall would not minimize odors or prevent sludge.

In regard to potential odors, all solid waste transfer and processing operations will be conducted within a fully enclosed building which will minimize the potential for odor impacting the surrounding neighborhood. Use of an overhead misting system, which will contain odor neutralizing and/or masking agents if determined necessary by the LEA, local businesses or neighborhood residents, will be utilized to reduce potential odor impacts as well as to control dust. Operationally, all solid waste must be removed from the facility within 48 hours of receipt and any odiferous loads will be transferred out immediately. The operator will implement an Alternative Odor Management Plan and post contact information at the facility entrances so that the public can report any complaints regarding odors or related operating issues that might affect surrounding property owners, tenants or residents.

As all solid waste tipping and transfer operations will be conducted within an enclosed building and the foodwaste will be stored in tanks, the potential for runoff and/or sludge impacting the surrounding neighborhood would be reduced to less than significant levels.

**THE 24TH AND 25TH E. STREET, LOS ANGELES,
CALIFORNIA NEIGHBORHOOD'S**

COMMENTS TO

**DRAFT INITIAL STUDY/MITIGATED NEGATIVE
DECLARATION RE: UNIVERSAL WASTE SYSTEMS, INC.
24TH STREET TRANSFER STATION, 2460-2440 E. 24TH
STREET AND 2465 E. 25TH STREET, LOS ANGELES,
CALIFORNIA 90058**

Lead Agency:

City of Los Angeles Local Enforcement Agency
3550 Wilshire Boulevard, 18th Floor
Los Angeles, California 90010
(213) 252-3348

September 2016

1 | Page

Mr. Jose Gutierrez
LEA Program Supervisor
City of Los Angeles Department of Building and Safety Local Enforcement Agency
3550 Wilshire Boulevard, 18th floor
Los Angeles, California 90010

Dear Mr. Gutierrez:

1 We are owners of the businesses and properties in the neighborhood of Universal Waste Systems, Inc.'s proposed 24th Street Transfer Station located at 2460-2440 E. 24th Street and 2465 E. 25th Street, Los Angeles, California 90058 ("Project"). We take this opportunity to provide the City of Los Angeles Local Enforcement Agency ("Lead Agency") with comments to the draft Initial Study/Mitigated Negative Declaration for the Project ("IS/MND") in response to the Lead Agency's Notice of Availability and Intent to Adopt the IS/MND.

2 The Project proposes to construct a 30,000 square foot solid waste transfer station (which will include an at grade load out area, a tipping area which can accommodate multiple collection vehicles, a hazmat locker, and a separate ingress/egress points for collection and transfer trucks), a 45 foot long automated scale, radiation detector, food waste processing equipment, portable trailer with offices, a break room, restrooms and parking. The new collection trucks will have an 8 ton payload capacity and new transfer trucks will have a payload capacity of 23 tons. Also, the Project includes an application for a 1,000 ton per day Solid Waste Facility Permit. The Project proposes to operate 7 days a week, 24 hours a day.

3 Currently, Universal Waste Systems, Inc.'s ("Universal") property is used for parking the company's vehicles, refueling and maintenance of those vehicles, office space, and operates under a 150 ton per day direct transfer facility solid waste facility permit and a 15 ton per day limited volume transfer operation solid waste facility permit. In short, the Project will completely alter the current use of Universal's two properties and destroy the environment of our neighborhood directly by constructing a 30,000 square foot waste transfer station with a radiation detector, daily increasing the number of trucks on our local streets by over 600% (from 29 to about 184 trucks), increasing the solid waste operations to 1,000 tons per day (over 600% increase) and operate 7 days a week, 24 hours a day. The Lead Agency should not rush this process by adopting the IS/MND, but rather the Lead Agency should require an Environmental Impact Report ("EIR") that carefully and accurately considers the impact of the Project to the environment of our neighborhood.

4 Accordingly, we strongly urge the Lead Agency to not adopt the IS/MND and require an EIR for the Project because there is substantial evidence, as demonstrated below in our specific comments, that certain aspects of the Project may cause a significant effect on the environment.¹ If the Lead Agency determines that our comments constitute a fair argument that the Project may have a significant effect on the environment, then the Lead Agency shall prepare an EIR even

¹ Title 14 California Code of Regulations, Chapter 3, Section 15063(b)(2).

4 though the Lead Agency may also be presented with other substantial evidence that the Project will not have a significant effect.²

5 It is important that the Lead Agency consider in reviewing the IS/MND all the activities and impacts involved in planning, implementation, and operation of the Project.³ The Project has a significant effect on the environment and the Lead Agency must consider the views held by us, the members of the public in all areas affected.⁴ In evaluating the significance of the environmental effect of the Project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the Project and reasonably foreseeable indirect physical changes in the environment which may be caused by the Project.⁵ Indirect examples include increased traffic, fuel consumption, air pollution and potential increase in bus system.⁶ The physical changes proposed in the Project will cause adverse economic and social effect on the people and those adverse effects may be used as a factor in determining whether the physical change is significant.⁷

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.1. AESTHETICS				
Would the Project:				
c. Substantially degrade the existing visual character or quality of the neighborhood and its surroundings?	X			

6 Universal argues that the neighborhood is zoned M3 under the City municipal code and as such it argues the neighborhood is an industrial, urbanized, setting and the Project will not result in any significant changes or adverse impacts to the visual character of the neighborhood.

The practical reality is to the contrary. Our neighborhood consists of locally owned businesses where people work and customers frequent our businesses. It includes the Santa Fe Art Colony where local artists live and work. The neighborhood is not exclusively industrial manufacturing, but rather places of business where customers frequent and people work. The Project will substantially degrade the existing visual character and quality of the neighborhood because it proposes to construct a 30,000 square foot solid waste transfer station (which will include an at grade load out area, a tipping area which can accommodate multiple collection vehicles, a hazmat locker, and a separate ingress/egress points for collection and transfer trucks),

² Title 14 California Code of Regulations, Chapter 3, Section 15064(f)(1); see also, *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68.

³ *Antioch v. Pittsburg* (1986) 187 Cal.App.3d 1325 (citing *City of Carmel-by-the-Sea v. Board of Supervisors of Monterey County* (1986) 183 Cal.App.3d 229).

⁴ Title 14 California Code of Regulations, Chapter 3, Section 15064(a)(1)(c).

⁵ *Id.* at Section 15064(d).

⁶ *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247.

⁷ *Id.* at Section 15064(e) noting that overcrowding would be regarded as a significant effect; see also *Citizens Association for Sensible Development of Bishop Area v. Inyo* (1985) 172 Cal.App.3d 151.

6 a 45 foot long automated scale, radiation detector, food waste processing equipment, portable trailer with offices, a break room, restrooms and parking. The new collection trucks will have an 8 ton payload capacity and new transfer trucks will have a payload capacity of 23 tons. Also, the Project includes an application for a 1,000 ton per day Solid Waste Facility Permit – an over 600% increase operating 7 days a week, 24 hours a day.

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	X			
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7 The Project’s proposed huge new operations, including over 600% increase in daily tonnage of its proposed 7 days a week, 24 hours a day operations alone creates a new source of substantial light and glare that will adversely impact our neighborhood.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.3. AIR QUALITY				
Would the Project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	X			

8 Universal’s conclusion that the Project will have no impact on the air quality plan is self-serving and simply wrong. The Project’s substantial increase in operations at the site, including the new 8 and 23 ton trucks and new machines (e.g. radiation detector, etc.) is *prima facie* evidence that the air quality plan will be impacted. Universal’s tables purportedly demonstrating compliance with the Final 2012 AQMP, yet the supporting data is not provided. Also, Universal admits in the IS/MND that the construction of the Project will increase air emission (“The project will result in short-term air emissions associated with construction of the proposed 30,000 sf transfer station building.” (page 18)), yet the IS/MND concludes there will be no impact. This demonstrates the need for the Lead Agency to require an EIR to accurately evaluate the Project’s impact on the applicable air quality plan.

d. Expose sensitive receptors to substantial pollutant concentrations?	X			
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9 Universal concludes that there will be no impact. Yet, it acknowledges the existence of schools located 3,900 feet north and 4,400 feet east of the Project and that residences are a mere 3,500 feet away from the Project. The Santa Fe Art Colony is located at 2421 S. Santa Fe Avenue, Los Angeles, which is nearby the Project. The Santa Fe Art Colony is an enclave of art and creativity where artists live and work. This Colony is nestled in our neighborhood. Noteworthy, Universal fails to analyze the zoning in adjacent City of Vernon. Our businesses

9 have employees and customers who visit on a daily basis. The Project will expose us to various pollutants as the result of the proposed increased operations.

e. Create objectionable odors affecting a substantial number of people.	X			
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10 Universal opines that the Project will less than significant with mitigation incorporated. It is more than fair to conclude the Project will create objectionable odors as the result of the over 600% increase in the **daily tons of solid waste** operating 7 days a week, 24 hours a day. Not to mention the increase in trucks on our local streets. Our employees, customers, and neighbors will all be exposed to such in objectionable odors. Universal’s Odor Management Plan attached as Appendix B to the IS/MND demonstrates the need for the Lead Agency to require an EIR for the substantial increase in solid waste operations at the Project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.7. HAZARDS AND HAZARDOUS MATERIALS				
Would the Project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			

11 Universal states that “Hazardous and/or medical waste is not accepted” at the Project. (p. 27.) However, the Project proposes to include a radiation detector. Indeed the Project is planning on receiving hazardous waste, including radioactive waste. Such a Project should not be allowed in the densely populated area of our City. Universal’s proposed Hazardous Waste Load Checking Program is wholly inadequate and demonstrates the needs for an EIR for the Project.

b. Create a significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment?	X			
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12 The Project’s proposal to increase the tons of daily solid waste operations by over 600% and the inclusion of a radiation detector demonstrates that there is a potential significant impact to our neighborhood. Again, Universal’s proposed Hazardous Waste Load Checking Program is wholly inadequate and demonstrates the needs for an EIR for the Project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.8. HYDROLOGY AND WATER QUALITY				
Would the Project:				
a. Violate any water quality standards or waste discharge requirements?	X			

13 Universal concludes that the Project will be less than significant impact because it will use leaf blowers two or three times a day. The fact is the Project will process up to 1,000 tons of solid waste a day. Universal's proposal is overly simplistic and not sufficient to protect our neighborhood nor the public's previous rivers and groundwater basins from the wastes it will process.

b. Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site?	X			
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14 The Project will continue using storm water surface draining to Minerva Street, 24th Street, and 25th Street, which all feed into the Los Angeles River. Universal concludes that the Project will not change the drainage patterns. However, it neglects to analyze the increase in drainage as the result in substantial increase in operations at the site.

f. Otherwise substantially degrade water quality?	X			
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15 Universal neglects to analyze the increase in drainage as the result in substantial increase in operations at the site and its impact on the capacities of the local surface drains to handle the increased capacities.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.9. LAND USE AND PLANNING				
Would the Project:				
a. Physically divide an established community?	X			

16

Universal concludes that the Project will have no impact on the community. We, the business owners and property owners of the neighborhood around the Project, strongly state that the Project physically divides our community, by the increased operations (over 600% increase in solid waste), increase traffic, smells and general nuisances of such a large solid waste transfer station. Such direct and indirect aspects of the Project will negatively impact our employees, our customers, our properties, our businesses and the Santa Fe Art Colony.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.11. NOISE				
Would the Project result in:				
a. Exposure to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			

17

Universal concludes that the Project will be less than significant impact because our neighborhood is the M3 zone. The fact is that Universal acknowledges that the construction of the Project alone will result in noise impacts. The magnitude of the Project, as repeatedly detailed in these comments, demonstrates that the noise will adversely impact the local businesses' employees, customers, the Santa Fe Art Colony, and the general public.

b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	X			
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18

Universal concludes that the Project will be less than significant impact because the activity is 3,900 ft from a resident or land in a residential zone – which ignores our employees, customers and the people of our neighborhood. Again, the magnitude of the Project demonstrates that the noise will adversely impact the local businesses' employees, customers, the Santa Fe Art Colony and the general public.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.15. TRANSPORTION/TRAFFIC				
Would the Project:				
a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (<i>i.e.</i> result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections?	X			

19 Universal concludes that the Project will be less than significant impact, yet it acknowledges that the over 600% increase in permitting solid waste operations will yield an increase in over 600% of trucks (29 to 184) daily on our local streets. These trucks will have loads of 7 tons and 23 tons. Such an increase in operations on our local streets will not “simply shift existing traffic patterns in the area” (p.38) as argued by Universal. Instead, the Project will cause an increase in traffic that is substantial (*e.g.* over 600% increase in daily truck traffic) in relation to the existing traffic load and capacity of the currently stressed street system.

b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	X			
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20 The Project potentially significant impacts the level of service standard established by the County Congestion Management Agency for both local streets and highways for the reasons discussed above under 3.15 a.

c. Result in a change in air Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	X			
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21 The Project potentially significant impacts the level of service standard established by the County Congestion Management Agency for both local streets and highways for the reasons discussed above under 3.15 a.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.16. UTILITIES AND SERVICE SYSTEMS				
Would the Project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	X			

22

Universal concludes that the Project will be less than significant impact because it will reduce the number of employees at the site. However, the fact is the Project will process up to 1,000 tons of solid waste a day and substantially increase the operations of the site – are *prima facie* evidence that the wastewater treatment requirements may be exceeded due to the substantial increase in operations without adequate preventative measures, which Universal offers none. In fact, Universal admits that “Environmental impacts may result from project implementation due to the processing of solid waste at the facility.” (p. 41.)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3.17 GREENHOUSE GAS EMISSIONS				
Would the Project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	X			

23

The Project’s over 600% increase in permitting solid waste operations will yield an increase in over 600% of trucks (29 to 184) daily on our local streets. Such increase in operations will significantly impact greenhouse gas emissions.

24

Our comments demonstrate a fair argument that there is substantial evidence that the noted aspects of the Project may cause a significant effect on the environment.⁸ Accordingly, the following findings may be made based upon the comments on the IS/MND:

The Project has the potential to degrade the quality of the environment of our neighborhood.

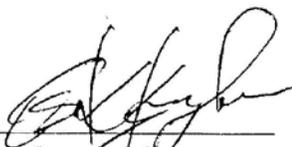
⁸ Title 14 California Code of Regulations, Chapter 3, Section 15063(b)(2).

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	X			
--	---	--	--	--

- 25 The Project's over 600% increase in permitting solid waste operations will yield an increase in over 600% of trucks (29 to 184) daily on our local streets. Such increase in operations will significantly impact greenhouse gas emissions.
- 26 Our comments demonstrate a fair argument that there is substantial evidence that the noted aspects of the Project may cause a significant effect on the environment. Accordingly, the following findings may be made based upon the comments on the IS/MND:
 - The Project has the potential to degrade the quality of the environment of our neighborhood.
 - The Project will have impacts that are individually limited, but cumulatively considerable, when considering the planned or proposed development in the City.
 - The Project will have environmental effects that will adversely affect us, the people in the neighborhood, both directly and indirectly.
- 27
- 28
- 29 In conclusion, we sincerely hope that the Lead Agency will listen to our concerns and deny the IS/MND and require an EIR for the Project. Thank you for your time and consideration of our side of the Project.

Very truly yours,

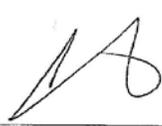
The 24th and 25th E. Street, Los Angeles,
California Neighborhood

Signature: 
 Print Name: Osko Karaghossian
 Company: OYK Properties

Address: 2416, 2420, & 2424 E. 24th Street LA, 90058

Telephone Number: 310-498-7910

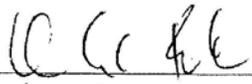
Signature: 
Print Name: JARSH or NASSIRI
Company: TEPCO
Address: 2437 E 24th ST
Telephone Number: 213-222-2220.

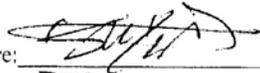
Signature: 
Print Name: Adam Starr
Company: Fragrant Jewels (tenant)
Address: 2417 E 24th ST, LA 90058
Telephone Number: (213) 926-6341

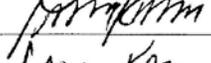
Signature: 
Print Name: SHARYAR AYNGBAZAN
Company: TEXTILLARY INC
Address: 2437 E 24th ST, LA CA 90058
Telephone Number: (213) 216-7002

Signature: _____
Print Name: _____
Company: _____
Address: _____
Telephone Number: _____

Signature: _____
 Print Name: Oskho Karaghossian
 Company: OYK Properties
 Address: 2417 & 2453 E. 25th Street LA, 90058
 Telephone Number: 310-498-7910

Signature: 
 Print Name: HEUNG S. PARK
 Company: NAVI ACCESSORIES INC
 Address: 2424 EAST 24th ST.
 Telephone Number: (323) 581-0001

Signature: 
 Print Name: G. Gu Metal
 Company: G. Gu Metal
 Address: 2416 & 2476 ST
 Telephone Number: 323 7756309

Signature: 
 Print Name: LARRY KAN
 Company: P. KAN METAL
 Address: 2448 E 25th ST
 Telephone Number: 323 585-5058

Signature: _____

Print Name: _____

Company: _____

Address: _____

Telephone Number: _____

Signature:  _____

Print Name: Adam Starr

Company: Fragrant Jewels (tenant)

Address: 2417 E 24 St LA 90058

Telephone Number: (213) 926-6341

Signature: _____

Print Name: _____

Company: _____

Address: _____

Telephone Number: _____

Signature: _____

Print Name: _____

Company: _____

Address: _____

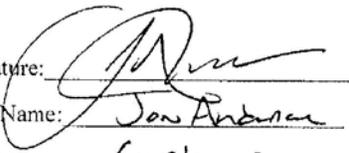
Telephone Number: _____

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

UWS 24th Street Transfer Station

Signature: 
 Print Name: CHRIS SAMBOSIN
 Company: EVO ESPERANZA LLC
 Address: 2417 E 25th St Los Angeles
 Telephone Number: 614/342-1130

Signature: 
 Print Name: MICHAEL ARIZO
 Company: 2417 E. 25th LLC
 Address: 2417 E. 25th St Los Angeles, CA 90058
 Telephone Number: 213-4474832

Signature: 
 Print Name: Jon Anderson
 Company: Corsicuro
 Address: 2437 E. 24th St.
 Telephone Number: 323-587-4337

Signature: 
 Print Name: JAYMONT D BILALI
 Company: NBA 24th St LLC
 Address: 2437 E 24th St LA CA 90058
 Telephone Number: 213-745-4446

Signature: _____
 Print Name: _____
 Company: _____

Signature: 
Print Name: Inca Tapia
Company: Colo Tras Trading Inc
Address: 2453 E 25th St
Telephone Number: (323) 589-1270

Signature: 
Print Name: DAVID JONES
Company: City fibers, Inc.
Address: 2500 S. Santa Fe
Telephone Number: (323) 583-1013

2.2.2 THE 24TH AND 25TH E. STREET, LOS ANGELES, CALIFORNIA NEIGHBORS (NEGBORS)

September 2016

Response Neighbors-1

Comment noted regarding the opportunity to provide the City of Los Angeles Local Enforcement Agency ("Lead Agency") with comments to the draft Initial Study/Mitigated Negative Declaration for the Project ("IS/MND") in response to the Lead Agency's Notice of Availability and Intent to Adopt the IS/MND.

Response Neighbors-2

Comment noted that the project description includes construction of a 30,000 square foot solid waste transfer station (which will include an at grade load out area, a tipping area which can accommodate multiple collection vehicles, a hazmat locker, and a separate ingress/egress points for collection and transfer trucks), a 45 foot long automated scale, radiation detector, food waste processing equipment, portable trailer with offices, a break room, restrooms and parking. The new collection trucks will have an 8 ton payload capacity and new transfer trucks will have a payload capacity of 23 tons. Also, the Project includes an application for a 1,000 ton per day Solid Waste Facility Permit. The Project proposes to operate 7 days a week, 24 hours a day.

Response Neighbors-3

Comment noted regarding current operations on site which include parking for the company's vehicles, refueling and maintenance of those vehicles, office space, and operation of a 150 ton per day direct transfer facility solid waste facility permit and a 15 ton per day limited volume transfer operation solid waste facility permit.

It is noted that the daily trips associated with the project will increase by over 600 percent, however, it must be pointed out that those trips will be spread out over a 24 hour time span and will be scheduled to avoid peak traffic hours which occur between 7 AM and 9 AM, and between 4 PM and 6 PM. By enclosing solid waste processing and transfer operations inside a building and with adoption of proposed mitigation measures, the proposed project will not create any adverse environmental impacts and an EIR is not required. The Lead Agency is carefully considering the comments received and will not adopt a MND unless all potential project impacts are adequately addressed.

Response Neighbors-4

The Lead Agency will review the comments submitted and determine if there is a fair argument that the Project may have a significant effect on the environment. If it is determined that the project could have a significant effect on the environment, then the Lead Agency shall prepare an EIR.

Response Neighbors-5

The views and input of the public are an important part of the environmental review process and responses to all comments are provided.

It is important to note that the City of Los Angeles is in the process of finalizing an exclusive franchise system for commercial solid waste collection that will bring improvements to the environment, create new jobs and better working conditions, and that the proposed project will be an integral part of the commercial solid waste collection franchise system.

UWS, Inc. has been awarded the northeast franchise zone which is one of 11 franchise zones in the City of Los Angeles, and the proposed project will be part of the UWS solid waste collection and processing system.

As part of the City's commercial solid waste franchise system, the proposed UWS, Inc. project will assist in reducing air quality impacts associated with the current open market, non-exclusive, solid waste collection system by:

- Reducing vehicle miles traveled by collection trucks through the centralized location of recycling and transfer facilities, such as the proposed project, within each franchise service zone;
- Reduce dust and odors by processing solid waste and recyclables within a fully enclosed buildings that include adequate worker protections; and,
- Improve both local and regional air quality as a result of converting collection truck fleets to run on alternative fuels such as CNG.

While the proposed project will result in limited environmental impacts related to construction and operation, with implementation of the proposed mitigation measures, as well as compliance with the City's solid waste collection franchise requirements, those impacts will be reduced to be less than significant levels.

Response Neighbors-6

As the comment letter notes, the surrounding neighborhood consists of locally owned businesses and includes the Santa Fe Art Colony artist's live/work facility. The proposed project will not, however, degrade the existing visual character and quality of the neighborhood.

The proposed project will be architecturally similar to other metal warehouse structures located within the surrounding area. In addition, the project will include five foot wide landscape areas along the property's street frontages, and an eight-foot tall perimeter block wall for screening purposes. The proposed project will also comply with the City' zoning requirements regarding floor area, height and parking. Finally, the 30,000 sf building will enclose existing open air solid waste transfer and processing operations and will replace a collection truck refueling operation which could be considered less aesthetically pleasing than the proposed project.

Response Neighbors-7

While the project will increase the maximum daily tonnage, and operate up to 7 days a week, 24 hours a day, it will not create new source of substantial light and glare that will adversely impact the neighborhood. There are currently exterior building and pole mounted lights associated with the existing solid waste and fueling operations at the site. While the proposed project will have the potential to operate 24 hours per day, the potential increase in nighttime lighting is considered to be nominal when compared to existing conditions. City regulations require that outdoor lighting be shielded and directed away from adjacent properties in order to minimize potential impacts. Based on the nominal changes in exterior lighting over existing conditions, and with implementation of the applicable building code standards, any potential adverse lighting impacts would be reduced to be less than significant levels.

Response Neighbors-8

The comment letter states that the project's substantial increase in operations at the site, including the new "8 and 23 ton trucks and new machines (e.g. radiation detector, etc.) is *prima facie* evidence that the air quality plan will be impacted".

The radiation detector does not create any air quality emissions in and of itself, and is mandated by State regulations.

Regarding the air quality plan, as set forth in the Draft IS/MND, there are two consistency criteria that should be referred to in determining a project's conformity with the AQMP. Consistency Criteria 1 refers to a project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation. Consistency Criteria 2 refers to a project's potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP's implementation.

Regarding "Consistency Criteria 1", the proposed project will not result in an increase in the frequency or severity of an existing air quality violation or a contribution to the continuation of an existing air quality violation because collection trucks, which are and will be the primary vehicles using the facility, are required to comply with the California Air Resources Board solid waste collection vehicle (SWCV) rule which was adopted by the in 2004. This rule applies to all SWCV diesel vehicles more than 14,000 pounds in weight with engines more than 7 years old (before 2006) that collect waste for a fee. All vehicles subject to the SWCV rule are required to reduce smoke from 100% of tier 1 engines and 60% of tier 2 engines. Eventually all of the collection vehicles involved in commercial solid waste collection will use compressed natural gas (CNG), thus meeting these requirements. In addition, diesel fueled transfer trucks and off-road equipment used as part of the facility operation are also subject to increased emission controls and regulations as older engines are phased out and replaced with newer models.

Since emissions from equipment and vehicles associated with the project's construction and operation will be below the established significance thresholds (see Table 1 on page 18 and Table

2 on page 19 of the Draft IS/MND), and, and with adoption of the proposed mitigation measure, air quality impacts are anticipated to be less than significant.

It should also be noted that due to the existing commercial solid waste collection structure in place within the City of Los Angeles, some waste haulers are not required by the state to operate clean/alternative fuel vehicles, thereby negatively impacting local air quality. In addition, multiple haulers operating in a given area translate to more refuse trucks on the road, overall greater traffic impacts, and more localized emissions from older collection trucks. As a franchised commercial solid waste collection company, UWS will assist in reducing air quality impacts by using clean/alternative fuel vehicles and more efficient collection truck routing. UWS, Inc. has updated its collection vehicles and equipment to meet state and South Coast Air Quality Management District (SCAQMD) regulations in compliance with the City's franchise agreement. Per the franchise agreements, collection vehicles must be clean fueled, using CNG or liquefied natural gas, and be less than 8 years old at the start of the contract and less than 10 years old throughout the duration of the first term of the contract.

The following additional mitigation measure is proposed to reduce air emissions including PM10 and NOx emissions related to construction and onsite operations:

- Off-road diesel powered equipment, such as loaders and excavators, shall use Tier 3 or 4 engines which shall employ the Best Available Control Technology/diesel particulate filters.
- All diesel powered vehicles and equipment be shut off when not in use to reduce emissions from idling.

Response Neighbors-9

The comment is in regard to project related air quality impacts on sensitive receptors and concludes there is a potentially significant impact due to the proximity of the Santa Fe Art Colony and the failure to analyze zoning in the City of Vernon. Figure 5 "1,000 Foot Zoning Map" on page 8 of the Draft IS/MND shows the zoning of properties in the City of Los Angeles and the City of Vernon. The City of Los Angeles zoning within 1,000 feet of the project site is industrial and the zoning within 1,000 feet of the project site in the City of Vernon is industrial with a slaughter overlay.

Figure 6, "Sensitive Receptor Locations", of the IS/MND shows the location of sensitive school and residential developments within the City of Los Angeles and the City of Vernon and the substantial distances those uses are from the proposed project.

It should be noted, that the Santa Fe Arts Colony was permitted in the M3 zone under a conditional use permit. Under Los Angeles Municipal Code Section 12.24-X,13, a Zoning Administrator may, upon application, permit joint living and work quarters for artists and artisans, including individual architects and designers, in commercial and industrial buildings in the M3 Zone provided that:

1. the uses of property surrounding the proposed location of the joint living and work quarters and the use of the proposed location will not be detrimental to the health, safety and welfare of prospective residents of the quarters; and,
2. the proposed joint living and work quarters will not displace viable industrial uses and will not substantially lessen the likelihood that the property will be available in the future for industrial uses.

Response Neighbors-10

The commentator notes that the project will create objectionable odors as the result of the increase in the solid waste processing, increased traffic and the need for an odor management plan, and that employees, customers, and neighbors will all be exposed to such in objectionable odors.

While the proposed project has the potential to create odors, specific measures have been incorporated into the project design which would reduce potential impacts to less than significant levels. By conducting all operations in inside a building, implementing a first-in/first-out policy for waste transfer, implementing an Alternative Odor Management Plan as part of facility operations, and using an overhead misting system with odor masking or neutralizing agents, odor impacts would be reduced to less than significant levels. Odor management will be an ongoing job responsibility of the facility management and employees. Telephone numbers will be posted at the facility exterior for neighbors to use if any odors are detected in the area surrounding the proposed facility. Finally, regular facility cleaning and prioritizing the removal of odiferous loads, will also minimize the potential for odor impacts to the surrounding neighborhood.

Response Neighbors-11

The commentator notes that including a radiation detector as part of the project design, and incorporating a Hazardous Waste Load Checking Program as part of the project’s operations, demonstrates the need for preparation of an EIR.

The proposed project will not be permitted to accept hazardous or medical waste but will have the necessary protocols in place to handle such waste if it is delivered to the facility by commercial waste collection trucks. Hazardous waste can include paint, used motor oil and medical waste, such as dressings, that are disposed of improperly by patients. Radiation detectors are placed near the truck scale so that contaminated loads don’t enter the waste-stream and eventually local landfills. It should be noted that solid waste facilities are required to check random collection truck loads during operation in order to screen for hazardous materials. The UWS, Inc. Load Checking Program is statutorily required (Title 14 CCR, Section 17409.5) and intended to ensure that hazardous and medical wastes are handled safely, will not be improperly disposed of in landfills and that workers are adequately protected in the event it is discovered in the wastestream.

Response Neighbors-12

See Response “Neighbors-11”

Response Neighbors-13

The commentator questions whether leaf blowers will adequately mitigate the potential impacts to water quality from litter. The fact that all solid waste tipping and transfer operations will be conducted within a building minimizes the potential for stormwater contamination and violation of water quality standards. Potential stormwater contamination will be further minimized by conducting litter patrols and using leaf blowers to keep the surrounding streets clean and free of litter. All interior floor drains will flow through a clarifier to the sanitary sewer system.

Response Neighbors-14

The commentator indicates that the Draft IS/MND neglects to analyze the increase in drainage as a result of the substantial increase in operations at the site. The increase in operations, or amount of material processed at the facility does not have correlation to the amount of runoff created during a rain event. The existing site is fully paved and developed with structures so the proposed project will not increase the amount of stormwater runoff at the site. In fact, the amount of permeable surface will increase with the provision of the proposed landscaping areas which will decrease the amount of runoff from the site. In addition, stormwater runoff will be further reduced through the project's compliance with the City's Low Impact Development (LID) requirements which requires that roof and exterior surface runoff be directed to a treatment system and subsequently infiltrated into the ground and eventually the groundwater table.

The fact that all solid waste tipping and transfer operations will be conducted within a building also minimizes the potential for stormwater contamination and violation of water quality standards. Interior floor drains will capture any water on the floor which will be directed to a clarifier and the sanitary sewer system under an industrial wastewater discharge permit.

Response Neighbors-15

The commentator notes that the Draft IS/MND neglects to analyze the increase in drainage as a result of the substantial increase in operations at the site and its impact on the capacities of the local surface drains to handle the increased capacities.

The increase in operations, or amount of material processed at the facility does not have correlation to the amount of runoff created during a rain event. The site is fully paved and developed with structures so the proposed project will not increase the amount of stormwater runoff at the site. In fact, the amount of permeable surface will increase with the provision of the proposed landscape strips which will decrease the amount of runoff from the site. In addition, stormwater runoff will be further reduced with through the project's compliance with the City's Low Impact Development (LID) requirements which requires that roof and exterior surface runoff be directed to a treatment device and subsequent infiltration into the ground.

The fact that all solid waste tipping and transfer operations will be conducted within a building minimizes the potential for stormwater contamination and violation of water quality standards. Interior floor drains will capture any water on the floor which be directed to a clarifier and the sanitary sewer system under an industrial wastewater discharge permit.

Response Neighbors-16

The commentator notes that while the Draft IS/MND concludes that the Project will have no impact on the community it will in fact physically divide the community due to the increased solid waste processing capacity, traffic, smells and general nuisances, and that those aspects of the Project will negatively impact the local community.

The project site is currently developed with a solid waste facility and collection truck refueling yard, and the proposed project will occupy the same parcels as the current operations. The potential for the proposed project to physically divide the surrounding community will therefore be minimal as it will occupy the same parcels as the current operation and no streets need to be closed or sidewalks removed in order to develop the project. Any project impacts related to traffic, noise, odors and land use, which are considered to be less than significant with mitigation, would not physically divide a community such as construction of a new freeway, rail line or utility right-of-way would have the potential to do.

Response Neighbors-17

The commentator notes that the magnitude of the Project demonstrates that the noise will adversely impact the local businesses' employees, customers, the Santa Fe Art Colony, and the general public. The project site is, however, located in a heavy industrial zone surrounded by heavily utilized roadways, railroad tracks and businesses which are generally not suitable for more restrictive zoning classifications where noise levels may be more closely regulated. The potential for adverse noise impacts are reduced by the fact that the all solid waste tipping and transfer operations will be conducted inside a building as well as the fact that existing ambient noise levels in the project vicinity are already on the louder end of the spectrum. In addition, by implementing operational and management oversight that includes specific direction to both employees and facility customers on how to minimize loud noises and being considerate of neighboring residents and businesses, the potential for adverse noise impacts is further reduced. The facility operator will endeavor to conduct noisy operations during normal business hours, and post contact information outside the facility to report any complaints regarding noise or operating issues that might affect surrounding property owners, tenants or residents.

Response Neighbors-18

The commentator notes that the magnitude of the Project demonstrates that ground borne noise and vibration will adversely impact the local businesses' employees, customers, the Santa Fe Art Colony, and the general public. As stated previously, the project site is located in a heavy industrial zone surrounded by heavily utilized roadways, railroad tracks and businesses which are generally not suitable for more restrictive zoning classifications where ground borne noise and vibration levels may be more closely regulated.

The proposed project does not include equipment or activities that produce ground borne vibrations or ground borne noise, and the proposed project will not introduce any new activities to the site

that generate or result in the exposure of persons to excessive ground born vibrations or ground borne noise.

Response Neighbors-19

The commentator notes that the Draft IS/MND concludes that the increased traffic from the project will be potentially significant in relation to the existing traffic load and capacity of the currently stressed street system.

Per the City of Los Angeles Department of Transportation's "Traffic Study Policies and Procedures", proposed projects that meet the following thresholds will require either a focused traffic analysis or a full traffic study:

- 25 to 42 increase in net peak trips – LADOT requires a technical analysis to determine potential traffic impacts and mitigations.
- 43+ increase in net peak trips – LADOT requires a traffic study by a licensed traffic engineer.

As shown in the "Project Trip Generation Estimates" table below, the proposed project will generate 14 AM peak hour trips and 7 PM peak hour trips per day which are below the LADOT thresholds for additional traffic analysis.

The traffic totals from the table indicate the number of passenger-cars and pickup trucks; two-axle medium duty trucks (collection trucks and other similarly sized trucks); and three+ axle heavy duty trucks (transfer trucks) associated with the existing and proposed operations at the site. The collection and transfer truck trips were increased using passenger-car equivalence factors (PCEs) in order to provide a better representation of their impacts on total and peak hour traffic counts.

It should also be noted that the potential project related traffic impacts will be further reduced by the fact that the proposed project will generate traffic throughout the day, and the fact that collection truck routes will be scheduled in order to avoid peak traffic periods on local streets.

Project Trip Generation Estimates

Land Use/Vehicle Type	Daily			AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
EXISTING TRANSFER STATION (165 TPD)									
Employee Vehicles	36	36	72	4	0	4	0	12	12
Collection Trucks	44	44	88	1	1	2	7	0	7
Transfer Trucks	11	8	19	1	1	2	1	0	1
Total	91	88	179	6	2	8	8	12	20
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	36	36	72	4	0	4	0	12	12
Collection Trucks (2.0 PCE)	88	88	176	2	2	4	14	0	14
Transfer Trucks (3.0 PCE)	33	24	57	3	3	6	3	0	3
Total w/ PCE	157	148	305	9	5	14	17	12	29
PROPOSED TRANSFER STATION (1,000 TPD)									
Employee Vehicles	7	7	14	0	0	0	0	0	0
Collection Trucks	125	125	250	4	4	8	6	6	12
Transfer Trucks	44	44	88	2	2	4	2	2	4
Total	176	176	352	6	6	12	8	8	16
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	14	14	28	0	0	0	0	0	0
Collection Trucks (2.0 PCE)	250	250	500	8	8	16	12	12	24
Transfer Trucks (3.0 PCE)	132	132	264	6	6	12	6	6	12
Total w/ PCE	396	396	792	14	14	28	18	18	36
NET TRIP GENERATION (Proposed - Existing)									
Employee Vehicles	-29	-29	-58	-4	0	-4	0	-12	-12
Collection Trucks	81	81	162	3	3	6	-1	6	5
Transfer Trucks	33	36	69	1	1	2	1	2	3
Total	85	88	173	0	4	4	0	-4	-4
With Passenger-Car Equivalence (PCE)									
Employee Vehicles (1.0 PCE)	-22	-22	-44	-4	0	-4	0	-12	-12
Collection Trucks (2.0 PCE)	162	162	324	6	6	12	-2	12	10
Transfer Trucks (3.0 PCE)	99	108	207	3	3	6	3	6	9
Total w/ PCE	239	248	487	5	9	14	1	6	7

Note:

Trip generation estimates provided by UWS for operation of the Existing and Proposed facilities.

Response Neighbors-20

The commentator states that the project could potentially exceed the level of service standard established by the County Congestion Management Agency for designated roads and highways for the reasons discussed above under 3.15 a.

Under the City of Los Angeles Bureau of Sanitation Exclusive Franchise System For Municipal Solid Waste Collection environmental analysis, overall citywide collection activities were estimated to result in a small 2 percent decrease in vehicle miles travelled, and concluded that those collection activities were not expected to result in significant traffic impacts, or conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness regarding alternative transportation.²

Response Neighbors-21

It appears that the commentator repeated the previous comment when in fact the comment was addressing the proposed project’s potentially significant impact on air traffic patterns including an

² City of Los Angeles Bureau of Sanitation Exclusive Franchise System For Municipal Solid Waste Collection CEQA Findings of Fact and Statement of Overriding Considerations, March 2014, Page 4-67.

increase in traffic levels and/or a change in location that results in substantial safety risks. As discussed in the Draft IS/MND, the proposed project will not change air traffic patterns and no impacts are anticipated.

Response Neighbors-22

The commentator states that the increase in solid waste at the facility is *prima facie* evidence that the wastewater treatment requirements may be exceeded due to the substantial increase in operations without adequate preventative measures, which Universal offers none. In fact; Universal admits that "Environmental impacts may result from project implementation due to the processing of solid waste at the facility." (p. 41.) The increase in solid waste processed at the UWS 24th Street Transfer facility would not result in a substantial increase in wastewater generated onsite. Water use is minimized for a number of reasons at transfer stations. Typically, overhead misters are used for dust suppression, and due to the minimal amount of water used, is absorbed into the waste stream and does not generate any runoff. Water use is also minimized by limiting facility wash down activities, and by using and alternative cleaning methods such as brooms or leaf blowers. Any excess water captured in floor drains would be treated through a clarifier before being discharged to the sanitary sewer system. An industrial wastewater permit will be required if a clarifier is proposed for the discharge of any wastewater into the sanitary sewer system, and an additional mitigation measure U2 is proposed to require such a permit. The overall reduction in the number of employees on site, from 36 to 14, will reduce overall wastewater generation at the proposed facility.

Response Neighbors-23

The commentator indicates that the Project's over 600% increase in permitting solid waste operations will yield an increase in over 600% of trucks (29 to 184) daily on our local streets, and that such increase in operations will significantly impact greenhouse gas emissions.

As a designated franchisee under the City's Commercial Solid Waste Collection Franchise system, UWS, Inc. is required to power 100 percent of the collection truck fleet within its franchise zone on clean fuel fuels such as compressed natural gas (CNG) or liquefied natural gas (LNG). The California Air Resources Board (CARB) has concluded that a CNG fueled vehicle emits 20 to 29 percent fewer GHG emissions than a comparable gasoline or diesel fueled vehicle on a well-to-wheel basis.

In addition, under the City's Commercial Solid Waste Collection Franchise, the proposed project would be expected to contribute to the reduction in overall GHG emissions as compared to the existing collection activities because VMTs associated with such new facilities would be reduced due to their locations within the proposed franchise zones. Furthermore, operation of the transfer station would not likely be classified as a major source of GHG emissions since there are no heating or cooling systems and the foodwaste de-packaging system would be electrically operated.

GHG emissions from collection activities would not contribute substantial amount to the State emissions inventory, and would not interfere with the AB 32 Scoping Plan and the long-term goal of AB 32 to reduce GHG emissions to 1990 levels by 2020. Further, the greenhouse gas emission

from the collection activities under are not expected to conflict or delay the implementation of the policies, plans, and regulations set forth by the state and local agencies to reduce GHG emissions.

Response Neighbors-24

The commentator states that the written comments demonstrate a fair argument that there is substantial evidence that the noted aspects of the Project may cause a significant effect on the environment. Accordingly, the following findings may be made based upon the comments on the IS/MND:

- The Project has the potential to degrade the quality of the environment of our neighborhood.

The proposed project will be constructed and operated in a manner that will not degrade the quality of the local neighborhood or environment. By conducting all solid waste handling and transfer activities in a fully enclosed building, using alternative fuel vehicles and the latest emissions control technology, potential environmental impacts will be mitigated to less than significant levels. In addition, regular facility inspections by the City of Los Angeles and CalRecycle, as well as an open and responsive management team will result in a solid waste facility that is integrated into and part of the neighborhood with little or no impacts to residents or businesses.

Response Neighbors-25

The commentator notes that the over 600% increase in permitted solid waste operations will yield an increase in over 600% of trucks (29 to 184) daily on our local streets. Such increase in operations will significantly impact greenhouse gas emissions.

As discussed in the draft IS/MND for the UWS Project, Section 3.18, page 43, AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28 percent reduction in "business as usual" GHG emissions for the entire State. As the proposed project would reduce its GHG emissions by at least 35 percent as previously indicated, the potential GHG impacts are considered to be less than significant.

Response Neighbors-26

The commentator indicates that there is a fair argument that there is substantial evidence that the Project will have the potential to degrade the quality of the environment of the local neighborhood. While the proposed project may result in impacts to the environment, the proposed mitigation measures will reduce those impacts to less than significant levels.

Response Neighbors-27

The commentator indicates that there is a fair argument that there is substantial evidence that the Project will have impacts that are individually limited, but cumulatively considerable, when considering the planned or proposed development in the City. There are no projects within 0.75 miles of the project site that would, when combined with the proposed project, have the potential

to create significant cumulative impacts. The traffic impacts associated with the project are below the threshold for a traffic impact analysis so there is no requirement to consider the potential for cumulative traffic or air quality impacts. Project related impacts are considered to be less than significant.

Response Neighbors-28

The commentator indicates that the Project will have environmental effects that will adversely affect people in the neighborhood, both directly and indirectly. While the proposed project may result in impacts to the environment, the proposed mitigation measures will reduce those impacts to less than significant levels.

Response Neighbors-28

The commentator request that the Lead Agency deny the IS/MND and require an EIR for the Project. Based on comments from the public and the responses to those comments, the LEA has determined that the IS/MND adequately analyzes the project's impacts, and the proposed mitigation measures adequately reduce those impacts to less than significant levels and is proposing to adopt this MND.

3.0 ERRATA

The following text changes are made to the Initial Study and incorporated as part of the Final IS/MND. These changes further substantiate conclusions and/or clarify aspects of the previously circulated document. None of these changes reflect a determination of a new or more significant environmental impact than disclosed in the Draft IS/MND. Pursuant to Section 15073.5 of the CEQA Guidelines, no changes are included in this Errata that would constitute a “substantial revision” to the Draft IS/MND or otherwise require recirculation of the Draft IS/MND. Additionally, pursuant to Section 15074.1 of the CEQA Guidelines, the revisions to mitigation measures set forth below do not constitute deletions or substitutions of mitigation measures that would require a public hearing. Changes to the text are noted with **bold** (for added text) or ~~strikeout type~~ (for deleted text).

The following additional mitigation measure is proposed to reduce air emissions associated with dust and odors:

AQ 4 – An overhead misting system shall be installed and operated to control dust and odors. The misting system shall have the capacity to dispense odor neutralizing or masking agents.

The following revisions and additional mitigation measure are proposed to reduce air emissions including PM10 and NOx emissions related to construction and onsite operations:

AQ 45. USW, Inc. will maintain mobile equipment used in conjunction with the Transfer Station per the manufacturer’s specifications.

AQ 56. Any diesel fueled transfer or collection trucks, as well as off-road diesel equipment, utilizing the UWS, Inc. 24th Street Transfer Station facility would be required to comply with the control measures outlined for mobile sources in the 2007 Final AQMP, and are required to comply with the California Air Resources Board (CARB) regulations which require older engines to be retrofitted with approved pollution control devices. Any new vehicles purchased by UWS, Inc. 24th Street Transfer Station will be required to use the latest low emissions engines. **UWS will also comply with the terms of the City Franchise agreement in regard to use of clean/alternative fuel collection trucks.**

AQ 7 - Off-road diesel powered equipment, such as loaders and excavators, shall use Tier 3 or 4 engines which shall employ the Best Available Control Technology/diesel particulate filters.

AQ 8 -All diesel engines shall be shut off when not in use to reduce emissions from idling.

The following additional mitigation measure and revised mitigation measure are proposed to the Section 3.16, Utilities and Service Systems:

Add the following mitigation measure to Subsection “e” related to wastewater: **U1 - An industrial wastewater permit will be required if a clarifier is proposed for the discharge of any industrial or process wastewater into the sanitary sewer system.**

Renumber the proposed mitigation measure in Subsection “g” as follows: ~~U1.~~ **U2.** -A full Solid Waste Facility Permit shall be obtained from the City of Los Angeles LEA Program in partnership with the California Department of Resources Recycling and Recovery (CalRecycle).

The Geology and Soils Section of the Draft IS/MND on page 27, under Section 3.6, Subsection b, page 27, has been revised as follows:

No topsoil erosion or loss of topsoil will result from the proposed project as ~~no new construction is proposed, and all activity areas are paved~~ **all construction activities will be regulated under a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit.**

With adoption of the following mitigation measure, impacts related to loss of topsoil and erosion will be reduced to less than significant levels:

GS1 – Prior to the issuance of building permits, the project shall obtain a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) from the State Water Resources Control Board and have a Storm Water Pollution Prevention Plan (SWPPP) prepared by a certified Qualified SWPPP Developer (QSD).

Appendix A of the Draft IS/MND, Transfer Processing Report, Table 2 under “List of Tables” on page iv, should read as follows: “TABLE 2 – ANTICIPATED PEAK DAILY VEHICLES (~~4,500~~ **1,000** TPD).”

Appendix A of the Draft IS/MND, Transfer Processing Report, Section 3.2.3, Transfer station Tipping Area, last sentence of first paragraph, has been revised as follows:

Inside the 30,000 sq. ft. transfer station building there is approximately 16,000 sq. ft. of floor area used for vehicle circulation area and 8,000 sq. ft. of tipping area. A 14-foot tall push wall will allow two refuse piles to be formed with 1:1 side slopes during the operating day which would provide enough room to accommodate approximately ~~1,85~~ **1,179** cubic yards (cy) of material on the tipping floor.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of the Public Resources Code, enacted by passage of AB 3180 (Cortese Bill), requires public agencies approving projects with the potential for significant environmental impacts to adopt a Mitigation Monitoring and Reporting Program. This objective of the program is to ensure that mitigation measures adopted to avoid or mitigate potentially significant environmental impacts are implemented. Section 21081.6 of the Public Resources Code requires all state and local agencies to establish monitoring and reporting programs whenever approval of a project relies upon a mitigated negative declaration or an environmental impact report (EIR). In accordance with these requirements, this mitigation monitoring and reporting program has been prepared to ensure that mitigation measures identified in the Initial Study/Draft Mitigated Negative Declaration (Draft IS/MND) for the proposed solid waste facility permit for the UWS, Inc. 24th Street Transfer Station Project, Los Angeles, California 90039-1006 (or subsequent revisions thereto), are implemented in an effective and timely manner, and that identified impacts are avoided or mitigated to a level of insignificance. This plan identifies responsible parties for the mitigation program, and includes a detailed discussion of monitoring and reporting procedures for each mitigation measure.

I. Responsible Party

The City of Los Angeles Local Enforcement Agency (LEA) in conjunction with UWS, Inc. 24th Street Transfer Station, or its designee, will be responsible for implementing and reporting mitigation measures in this program. The LEA and UWS, Inc. 24th Street Transfer Station will have responsibility for ensuring that mitigation measures are accomplished in an environmentally responsible manner. The LEA in conjunction with UWS, Inc. 24th Street Transfer Station will be responsible for ensuring that the status of mitigation measures is reported in accordance with this program. UWS, Inc. 24th Street Transfer Station will be responsible for ensuring that the cost of mitigation is included in its budget, as appropriate. UWS, Inc. 24th Street Transfer Station will be responsible for implementing both construction and operational related mitigation measures. UWS, Inc. 24th Street Transfer Station in conjunction with City of Los Angeles Local Enforcement Agency will be responsible for ensuring that applicable mitigation measures are carried forward in operational and maintenance procedures for the MRF/Transfer Station.

II. Mitigation Requirements

Based on the findings of the Draft IS/MND, mitigation measures are not required for agriculture resources, biological resources, land use and planning, mineral resources, population and housing, recreation and transportation/traffic and utilities/service systems. Specific mitigation measures are required or otherwise included for aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services and utilities and service systems. Potentially significant impacts in these environmental resource areas will be avoided or minimized with implementation of forty-four (44) specific mitigation measures summarized on Table A-1.

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

UWS 24th Street Transfer Station

Air Quality	AQ 1	All inbound and outbound loads, stockpiles and material storage areas shall be secured by tarping, baling, compacting, misting, or other appropriate means to prevent spillage and dust.	3.3.b
	AQ 2	All material transported on or off site shall be either sufficiently compacted, baled, or securely covered to prevent excessive amounts of dust.	3.3.b
	AQ 3	Open-top trailers, in a top-loading configuration, are required to cover their loads before leaving the facility.	3.3.b
	AQ4	An overhead misting system shall be installed and operated to control dust and odors. The misting system shall have the capacity to dispense odor neutralizing or masking agents.	3.3.b
	AQ5	UWS, Inc. 24 th Street Transfer Station will maintain mobile equipment used in conjunction with the MRF/Transfer Station per the manufacturer’s specifications.	3.3.b
	AQ 6	Any diesel fueled transfer or collection trucks, as well as off-road diesel equipment, utilizing the UWS, Inc. 24 th Street Transfer Station facility would be required to comply with the control measures outlined for mobile sources in the 2007 Final AQMP, and are required to comply with the California Air Resources Board (CARB) regulations which require older engines to be retrofitted with approved pollution control devices. Any new vehicles purchased by UWS, Inc. 24 th Street Transfer Station will be required to use the latest low emissions engines. UWS will also comply with the terms of the City Franchise agreement in regard to use of clean/alternative fuel collection trucks.	3.3.b
	AQ 7	Off-road diesel powered equipment, such as loaders and excavators, shall use Tier 3 or 4 engines which shall employ the Best Available Control Technology/diesel particulate filters.	3.3.b
	AQ 8	All diesel engines shall be shut off when not in use to reduce emissions from idling.	3.3.b
Geology and Soils	GS1	Prior to the issuance of building permits, the project shall obtain a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) from the State Water Resources Control Board and have a Storm Water Pollution Prevention Plan (SWPPP) prepared by a certified Qualified SWPPP Developer (QSD).	3.6.b
Hazards and Hazardous Materials	HHM 1	If inbound material contains prohibited material or hazardous material that is not detected at the time of delivery, then such material is separated, using procedures and methods to ensure employee safety, segregated by class, and manifested in accordance with federal and state regulations. Only employees with proper training will handle hazardous waste.	3.7.a

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

UWS 24th Street Transfer Station

(Hazards and Hazardous Materials cont.)	HHM 2	A spill response kit will include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment.	3.7.a
	HHM 3	Hazardous waste shall be kept in a special area which is restricted. This material (batteries, e-waste, u-waste, liquid waste, sharps, tires, pressure vessels, medical wastes, etc.) is stored within a secure and safe area within a designated hazardous material locker as indicated in the Facility Transfer and Processing Report.	3.7.a
	HHM 4	The facility shall comply with the Certified Unified Program Authority (CUPA) requirements related to temporary storage of hazardous substances.	3.7.a
	HHM 5	As required by the LEA and SWFP, and pursuant to an approved “Load Checking Program” random loads of solid waste, recyclables, CDI and green waste will be tipped apart from the main tipping area and visually inspected by a trained spotter. Loads will be spread out with loaders and hand rakes. Particular items such as drums, 5 gallon containers, wastes with DOT or other descriptive labels, sludges and liquids, soils and rags, and unidentifiable wastes suspected of being hazardous will be inspected and evaluated to determine whether the item is hazardous. Records of load checks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste, as well as a copy of the load checking program and copies of the load checking records for the prior year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.	3.7.a
Utilities and Service Systems	U1	An industrial wastewater permit will be required if a clarifier is proposed for the discharge of any industrial or process wastewater into the sanitary sewer system.	3.16.e
	U2	A full Solid Waste Facility Permit shall be obtained from the City of Los Angeles LEA Program in partnership with the California Department of Resources Recycling and Recovery (CalRecycle).	3.16.g

III. Schedule and Reporting Frequency

Table A-2 describes the method for executing the mitigation measure, organization responsible for implementing and funding the measure, estimated completion date for each measure, frequency of reporting, and significance after mitigation.

The monitoring and accomplishment of each mitigation measure will be documented by the applicant. Mitigation monitoring reports will be filled out by the appropriate individual verifying that steps to prevent or minimize environmental degradation have been completed as described in Table A-2. Monitoring reports will be submitted to City of Los Angeles Local Enforcement Agency as necessary, and be available for inspection upon request. Completion of these mitigation monitoring reports will demonstrate and document compliance with Public Resources Code 21081.6.

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ 1	All inbound and outbound loads, stockpiles and material storage areas shall be secured by tarping, baling, compacting, misting, or other appropriate means to prevent spillage and dust.	The facility manager and scale house attendant shall be responsible for insuring that this mitigation measure is carried out by visually inspecting incoming and outgoing traffic as well as all material storage areas.	C UWS, Inc. 24 th Street Transfer Station	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ 2	All material transported on or off site shall be either sufficiently compacted, baled, or securely covered to prevent excessive amounts of dust.	The facility manager and scale house attendant shall be responsible for insuring that this mitigation measure is carried out by visually inspecting incoming and outgoing loads.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant
AQ 3	Open-top trailers, in a top-loading configuration, are required to cover their loads before leaving the facility.	The facility manager and scale house attendant shall be responsible for insuring that this mitigation measure is carried out by visually inspecting incoming and outgoing traffic.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
AQ4	An overhead misting system shall be installed and operated to control dust and odors. The misting system shall have the capacity to dispense odor neutralizing or masking agents.	The facility manager shall be responsible for insuring that this mitigation measure is carried out by operating the misting system when necessary and adding odor neutralizing/masking agents as necessary.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Odor events will be noted in the daily log and necessary protocols employed as set forth in the Alternative Odor Management Plan.	Less than significant
AQ 5	UWS, Inc. 24 th Street Transfer Station will maintain mobile equipment used in conjunction with the MRF/Transfer Station per the manufacturer's specifications.	The scale house attendant shall be responsible for insuring that this mitigation measure is carried out by visually inspecting incoming and outgoing loads.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Upon placement of orders for new vehicles or as required by the SCAQMD.	Less than significant
AQ 6	Any diesel fueled transfer or collection trucks, as well as off-road diesel equipment, utilizing the UWS, Inc. 24 th Street Transfer Station facility would be required to comply with the control measures outlined for mobile sources in the 2007 Final AQMP, and are required to comply with the California Air Resources Board (CARB)	As older diesel powered vehicles are retired, UWS, Inc. 24 th Street Transfer Station shall purchase trucks with 2010 model year or newer engines or natural gas powered vehicles, or retrofit older vehicles with SCAQMD approved pollution control devices.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Violations will be noted in the daily log and repeat offenders will be barred from using or conducting business at the facility.	Less than significant

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
(AQ 6 cont.)	regulations which require older engines to be retrofitted with approved pollution control devices. Any new vehicles purchased by UWS, Inc. will be required to use the latest low emissions engines. UWS will also comply with the terms of the City Franchise agreement in regard to use of clean/alternative fuel collection trucks.					
AQ 7	Off-road diesel powered equipment, such as loaders and excavators, shall use Tier 3 or 4 engines which shall employ the Best Available Control Technology/diesel particulate filters.	UWS, Inc. 24 th Street Transfer Station shall purchase trucks retrofit older vehicles with SCAQMD approved pollution control devices.	UWS, Inc. 24 th Street Transfer Station	Ongoing	At time of equipment purchase	Less than significant
AQ 8	All diesel engines shall be shut off when not in use to reduce emissions from idling.	Floor spotters, loader operators and the facility manager shall be responsible for insuring that this mitigation measure is carried out by continuously monitoring operations.	UWS, Inc. 24 th Street Transfer Station	Ongoing	Periodic tailgate meetings as well as continuous education of drivers, equipment operators and customers.	Less than significant.

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
GS1	Prior to the issuance of building permits, the project shall obtain a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) from the State Water Resources Control Board and have a Storm Water Pollution Prevention Plan (SWPPP) prepared by a certified Qualified SWPPP Developer (QSD).	Storm Water Pollution Prevention Plan (SWPPP) prepared by a certified Qualified SWPPP Developer (QSD).	UWS, Inc.	Prior to pulling a building permit.	Per SWPPP	Less than significant.
HHM 1	If inbound material contains prohibited material or hazardous material that is not detected at the time of delivery, then such material is separated, using procedures and methods to ensure employee safety, segregated by class, and manifested in accordance with federal and state regulations. Only employees with proper training will handle hazardous waste.	All employees are trained to recognize and respond to potential hazardous materials discovered in the waste stream.	UWS, Inc. 24th Street Transfer Station	Ongoing	Any incident involving the discovery of hazardous materials, as well as to hazardous materials spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
HHM 2	A spill response kit will include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment.	Key employees are trained in the handling of hazardous materials.	UWS, Inc. 24th Street Transfer Station	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant
HHM 3	Hazardous waste shall be kept in a special area which is restricted. This material (batteries, e-waste, u-waste, liquid waste, sharps, tires, pressure vessels, medical wastes, etc.) is stored within a secure and safe area within a designated hazardous material locker as indicated in the Facility Transfer and Processing Report.	Key employees trained in the handling of hazardous materials will also be responsible for its proper classification and storage.	UWS, Inc. 24th Street Transfer Station	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation

HHM 4	The facility shall comply with the Certified Unified Program Authority (CUPA) requirements related to temporary storage of hazardous substances.	A CUPA permit will be obtained and/or revised.	UWS, Inc. 24th Street Transfer Station	Prior to issuance of a C of O.	One time with annual inspections by CUPA	Less than significant
HHM 5	As required by the LEA and SWFP, and pursuant to an approved "Load Checking Program" random loads of solid waste, recyclables, CDI and green waste will be tipped apart from the main tipping area and visually inspected by a trained spotter. Loads will be spread out with loaders and hand rakes. Particular items such as drums, 5 gallon containers, wastes with DOT or other descriptive labels, sludges and liquids, soils and rags, and unidentifiable wastes suspected of being hazardous will be inspected and evaluated to determine whether the item is hazardous. Records of load checks and the training of personnel in the recognition, proper handling, and	Key employees trained in the handling of hazardous materials will also be responsible for its proper classification and storage.	UWS, Inc. 24th Street Transfer Station	Ongoing	Any incident involving hazardous material, including spills, will be noted in the special occurrences log and the appropriate agencies notified as necessary.	Less than significant

Table A-2 Implementation of Mitigation Measures						
No.	Mitigation Measure	Method for Execution of Mitigation	Responsible Entity	Completion Date	Reporting Frequency	Significance After Mitigation
HHM 5 (Cont.)	disposition of prohibited waste, as well as a copy of the load checking program and copies of the load checking records for the prior year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.					
U1	An industrial wastewater permit will be required if a clarifier is proposed for the discharge of any industrial or process wastewater into the sanitary sewer system.	An industrial wastewater permit will be obtained from the City of Los Angeles.	UWS, Inc.	Prior to issuance of a Certificate of Occupancy for the new building.	Per the industrial permit.	Less than significant.
U1	A full solid waste facility permit shall be obtained from the City of Los Angeles LEA Program in partnership with the California Department of Resources Recycling and Recovery (CalRecycle).	An application for a large volume full solid waste facility will be obtained from the City of Los Angeles LEA Program in partnership with the California Department of Resources Recycling and Recovery (CalRecycle).prior to the start of any new operations proposed under this Draft IS/MND.	UWS, Inc. 24th Street Transfer Station	Prior to the receipt, processing or transfer of any MSW or mixed MSW.	Monthly inspections will be conducted by the LEA to insure the facility is operating as required under the solid waste facility permit.	Less than significant