



July 30, 2020

8/5/2020

Governor's Office of Planning & Research

Ms. Marilyn Simpson, AICP  
Community Development Manager/City Planner  
City of Irwindale  
5050 N. Irwindale Avenue  
Irwindale, CA 91076

**Jul 30 2020**

**STATE CLEARINGHOUSE**

**Subject:** Request for Review and Comment Letter for SCH No. 2013051029 – 2020 Recirculated Draft Environmental Impact Report, Irwindale Materials Recovery Facility and Transfer Station Project, Facility No. 19-AA-1135 – Los Angeles County

Dear Ms. Simpson:

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 Irwindale, acting as Lead Agency, has prepared and requesting for review and comment on the 2020 Recirculated Draft Environmental Impact Report (EIR; Proposed Project) 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 site is addressed as 2200 Arrow Highway, Irwindale, CA, 91706, and is located at the northwestern intersection of Live Oak Avenue and Arrow Highway, within the City of Irwindale, in eastern Los Angeles County, California. The Proposed Project site is 17.22 acres and currently zoned for Heavy Manufacturing and is designated for commercial land use in the City's General Plan. The Assessor's Parcel Number for the property is 8535-001-911. The City of Irwindale encompasses approximately 9.5 square miles within the San Gabriel Valley in eastern Los Angeles County and is located approximately 20 miles east of downtown Los Angeles. The City shares boundaries with seven neighboring municipalities, including Duarte (to the north and east), Azusa (to the north and east), West Covina (to the southeast), Baldwin Park (to the south), Monrovia (to the southwest and northwest), El Monte (to the southwest), and Arcadia (to the west). The site is located in an existing industrial area, with various commercial/industrial and recreational land uses in the immediate vicinity. Existing land uses adjacent to the site include a mixture of commercial and industrial to the west, east, and south, recreation/open space to the north, and residential to the south beyond

the commercial/industrial districts in the City of Baldwin Park, bordering the south side of Live Oak Avenue.

The Project Site is bordered on the south by Live Oak Avenue, on the east by the Santa Fe Dam and property owned by the U.S. Army Corps of Engineers, on the northeast by Arrow Highway, and on the west and northwest by an existing business/industrial parking lot. The site is crossed by a City of Los Angeles Department of Water and Power electricity transmission easement along the south side, which covers approximately 2.84 acres of the project site. In addition, Southern California Edison holds a 23-foot-wide, underground utility easement along the entire length of the site frontage on Arrow Highway.

The Proposed Project includes the construction of a municipal solid waste processing facility [a Material Recovery Facility and Transfer Station (MRF/TS)] designed to sort and recover recyclable and compostable materials, and bundle those for transport to respective destinations. The remaining residual wastes are transported to a regional landfill for disposal. The MRF/TS also includes a convenience store/public gas station. The convenience store/public gas station will have eight vehicle fueling positions (gasoline and diesel). No Compressed Natural Gas (CNG) fueling facilities are proposed within the project site. Athens waste collection and transfer trucks would not fuel at the public gas station.

The MRF/TS facility would be designed to receive, process and transfer 6,000 tons per day (tpd), based upon estimated averages of 3,000 tpd of municipal solid waste, 1,000 tpd of green waste, 1,000 tpd of construction and demolition materials, and 1,000 tpd of self-haul waste.

The MRF/TS is proposed to be open for waste receipt 24 hours per day, seven days per week with the majority of waste receipt typically occurring between the hours of 6:00 AM to 8:00 PM from Monday through Friday, 6:00 AM to 4:00 PM on Saturday, and from 8:00 AM to 4:00 PM on Sunday. The Proposed Project would add approximately 345 employees to the local and regional workforce.

## **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 2020 Recirculated Draft EIR, in addition to the specific location noted. Comments on the 2020 Recirculated Draft EIR are summarized below:

Page 5-11, Chapter 5 – Second paragraph states that the Proposed Project includes 741 convenience store/service station round trips, which is inconsistent with the 2016 Final EIR and the 2014 Recirculated Draft EIR, which states: “An additional 751 daily

trips would be associated with the convenience store/service station.” Please clarify which number is the accurate one for convenience store/service station traffic volume.

Solid Waste Regulatory Oversight

The Los Angeles County Department of Public Health is the Local Enforcement Agency (LEA) for Los Angeles County and responsible for providing regulatory oversight of solid waste handling activities, including inspections and permitting. Please contact Dorcas Hanson-Lugo of the LEA at 626.430.5540 to discuss the regulatory requirements for the Proposed Project.

**CONCLUSION**

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the 2020 Recirculated Draft EIR and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR 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 916.323.1799 or by e-mail at [nai.teurn@calrecycle.ca.gov](mailto:nai.teurn@calrecycle.ca.gov).

Sincerely,



Nai Teurn, Environmental Scientist  
Permitting & Assistance Branch – South Unit  
Waste Permitting, Compliance & Mitigation Division  
CalRecycle

cc: Benjamin Escotto, Supervisor  
Permitting & Assistance Branch – South Unit

Dorcas Hanson-Lugo, Chief  
Los Angeles County Department of Public Health, LEA