

Arnau, John [OCWR]

From: Arnau, John [OCWR]
Sent: Thursday, October 24, 2019 5:41 PM
To: Hamm, Kristina [OCWR]
Cc: Arbour, Jeff [OCWR]
Subject: RE: Comments on Mitigated Negative Declaration (MND) for Bee Canyon Greenery

Kristina, very good email! Should Dr. Gil ask for more specific information, the traffic study included in FRB Final EIR 604, which provides CEQA coverage for the continued development and operation of the FRB Landfill, analyzed and provided mitigation for the landfill receiving up to 874 trucks (i.e., waste hauling vehicles) per day. Currently, the landfill is receiving approximately 672 trucks per day. The addition of 22 trucks per day associated with the proposed Bee Canyon Greenery composting operation would still be well below the truck volumes analyzed in Final EIR No. 604.

From: Hamm, Kristina [OCWR] <kristina.hamm@ocwr.ocgov.com>
Sent: Thursday, October 24, 2019 4:24 PM
To: Gil, Vince <VGil@vanguard.edu>
Cc: Arnau, John [OCWR] <john.arnau@ocwr.ocgov.com>
Subject: RE: Comments on Mitigated Negative Declaration (MND) for Bee Canyon Greenery

Dr. Gil,

I hope this email will help address your outstanding questions and concerns. My intent is to provide the most comprehensive project information possible while explaining common industry misconceptions and nuances.

The project we are proposing is a necessary one, not only to help the City meet State legislative mandates, but also to keep costs of newly required organics recycling solutions low for residents such as yourself. I think everyone can agree that landfills offer an essential public service, and OC Waste & Recycling provides several enhanced benefits to host cities such as Irvine. Unfortunately, not all residents understand the relationship between the County and the City, and then the Haulers. I will do my best to explain those here and provide some clarity.

All approved truck routes are detailed in the Waste Disposal Agreement which was approved by the County and the City and includes requirements your council provided to ensure the beneficial use of the landfill while minimizing impacts to residents. Additionally, the cities within Orange County negotiate their individual hauling agreements and are responsible for ensuring those contract requirements are followed. Our relationship with the haulers is different than you might think. The haulers are customers of the landfill, and while we are in constant communication on many things including a recent reminder of which routes are approved, enforcement would be the responsibility of the City of Irvine. In an effort of good faith, we have advised City staff of your concerns and also communicated with the haulers to ensure approved routes are utilized.

As for your concerns regarding general truck traffic and potential for an additional 44 truck trips per day, the governing environmental impact report (EIR) analyzed the existing operations and was approved with the traffic study – adding 22 trucks to the route was not deemed a significant change to the approved EIR and therefore further CEQA analysis on this specific issue is not necessary or required.

Your email implies that your concern may be about general traffic in your area – the City of Irvine would have followed the same methodology when designing your neighborhood and surrounding communities. Given your background, I am sure you have already reviewed the approved development plans and provided any concerns to Irvine City planners.

If there is any information regarding the landfill's approved EIR or the current draft MND that I can provide you, please let me know. I would also like to invite you to tour our Frank R. Bowerman facility and see the current organics composting pilot project. I believe this may provide you with a better understanding of the proposed project and allow us a better platform to continue the conversation.

Regards,
Kristina

From: Gil, Vince <VGil@vanguard.edu>
Sent: Tuesday, October 22, 2019 2:20 PM
To: Hamm, Kristina [OCWR] <kristina.hamm@ocwr.ocgov.com>
Cc: Wagner, Donald <donald.wagner@ocgov.com>; christinashea@cityofirvine.org; melissafox@cityofirvine.org; Arnau, John [OCWR] <john.arnau@ocwr.ocgov.com>
Subject: RE: Comments on Mitigated Negative Declaration (MND) for Bee Canyon Greenery

Dear Ms Hamm,

Thank you for your comments in red. My added comments follow, **in blue**.
Certainly, much more needs to be done than offer pat answers.

Dr. Vincent Gil

From: Hamm, Kristina [OCWR] [<mailto:kristina.hamm@ocwr.ocgov.com>]
Sent: Tuesday, October 22, 2019 9:29 AM
To: Gil, Vince <VGil@vanguard.edu>
Cc: Wagner, Donald <donald.wagner@ocgov.com>; christinashea@cityofirvine.org; melissafox@cityofirvine.org; Arnau, John [OCWR] <john.arnau@ocwr.ocgov.com>
Subject: RE: Comments on Mitigated Negative Declaration (MND) for Bee Canyon Greenery

Mr. Gil,

Thank you for taking the time to contact us with your questions and concerns. Answers to your questions are provided below in red.

Please let me know if I can be of any further assistance.

Best,
Kristina

From: Gil, Vince <VGil@vanguard.edu>
Sent: Monday, September 30, 2019 3:21 PM
To: Hamm, Kristina [OCWR] <kristina.hamm@ocwr.ocgov.com>
Cc: Wagner, Donald <donald.wagner@ocgov.com>; christinashea@cityofirvine.org; melissafox@cityofirvine.org
Subject: Comments on Mitigated Negative Declaration (MND) for Bee Canyon Greenery

Dear Ms. Hamm,

Per the flyer/announcement received regarding the proposed **Bee Canyon Greenery** for composting operations, I'd like to provide commentary. Hopefully you can address some of the concerns, in particular what the **Limited Scope Traffic Impact Analysis** has to say regarding traffic mitigation.

- Please know from the onset I have a background in urban planning and worked for the US Department of Housing and Urban Development, Community Development Branch, for many years out of the Los Angeles and San Francisco District IX offices, both as a planner and high level administrator.
- **The Traffic report mentioned only takes into account, and assumes, the truckers en routes to/from the proposed site utilize ONLY Irvine Blvd., Trabuco, and Sand Canyon to access I-5 Fwy and/or move their deposits (eventually hauls from the proposed site.)** It also assumes 30 additional truck trips per day, 60 return trips from the proposed site, to accommodate delivery of completed composting materials from the site to reusers.

The designated haul routes for waste hauling vehicles going to and coming from the FRB Landfill are I-405, I-5, Sand Canyon Avenue, Portola Parkway and Bee Canyon Access Road. Haulers have been reminded that Irvine Boulevard is not a designated access route to and from the landfill. The actual number of new vehicles going to and coming from the proposed Bee Canyon Greenery composting operation will be 22 vehicles (44 trips total – 22 in and 22 out), associated with transporting finished compost materials to end markets.

Once again, a “reminder” does nothing to mitigate haulers ‘doing their thing’ and using Irvine Blvd. to get to Sand Canyon from the east, and using Irvine Blvd. to get to the 133 fwy entrance to the east. Camera surveillance should show the veracity of this. We encounter haul trucks in that space (between Sand Canyon and Ridge Route, and eastward on Irvine Blvd.) “all the time.” OC government needs to do more than “remind haulers.” Maybe working more diligently with the IPD and ticketing aggressively would send a clearer message...

- **Both of these are main bones of contention for individuals like us that live, and access our homes, from precisely the points mentioned in the report.** While the Report does not imply a negative impact due to the figures and estimates provided by the City of Irvine, as homeowners directly in the crosshairs of already present truck traffic, I can attest to it being a problem—and a greater one with the addition of 60 additional truck trips per day.
 1. **The study wrongly assumes that truck traffic impact will be minimal during peak hours; which, anyone that lives or uses the routes stated will quickly testify, “that isn’t correct”!** Trucks presently going TO and coming FROM Bee Canyon FRB waste landfill are *plentiful* at peak hours of the morning, especially; and also at the last “runs of the day” for these truckers, which happens to be peak hours for commuters as well. **Those involved in finally voting in such a project should insure that appropriate measures of truck traffic at present be integrated into the impact study and projections. Adding to that the proposed 30-60 truck additions should tell a very different story.**

The existing vehicle trips associated with the FRB Landfill operation, as well as all other non-landfill vehicle trips on Sand Canyon Avenue and Portola Parkway, are an existing condition and are therefore not required to be analyzed as part of the proposed project, which is for the proposed Bee Canyon Greenery composting operation only. The 44 additional vehicle trips per day associated with the composting operation will be spread out over the course of the operating day (7 AM – 5 PM). As confirmed in the Draft MND, Appendix G Traffic Impact Analysis, the vehicle trips associated with the proposed composting operation will not result in any significant impacts to roadway levels of service or cause any significant congestion impacts at intersections along Sand Canyon Avenue or Portola Parkway.

To say that existing problems with haul trucks are an “existing condition” and thus not “required” to be “analyzed” is as significant an oxymoron as I’ve heard lately. The very purpose of an MND is to provide accurate data on impacts of a proposed project. To not include “existing conditions” begs the question of impact. If one has xx trucks *already clogging* truck routes which are also vehicular traffic routes for residents of the area, businesses of the area, how can these not be required to be counted?

In your estimation, then, it’s quite ok for a country administered facility to continue to pollute the traffic routes to/from it, based on the fact that what is already existing on those routes “doesn’t count”? That is the very issue I was addressing in my correspondence: **We already have truck congestion galore in all the aforementioned streets/truck routes; adding more can only result in a worse condition.**

2. **The study assumes that truckers ONLY use the stated routes; but in reality, and living in the Pavilion Park neighborhood, which is accessed principally through Ridge Valley (a roundabout-ed route), I note significant numbers of truckers who use this Ridge Valley route to quickly access Portola, since it only has one stop vs. significant red lights on Sand Canyon. From there, an easy turn to Bee Canyon and the FRB entry. Similarly on returning to Irvine Blvd., where these can make a quick entry into the 73 FWY or proceed east on Irvine Blvd. without the hassles of Sand Canyon. These truckers are a nightmare going through the Ridge Valley route: Not only do they often speed, but turn and take the roundabout with cargo using two lanes to girth their trucks, making any drivers present a potential hazard in harm's way. (I've already complained to the IPD, who tell me there are no truck restrictions on Ridge Valley north from Irvine Blvd. to Portola, hence, no offenses. This is crazy.)**
3. **Regardless of what the City of Irvine may estimate, Irvine Blvd. is at peak or near-peak for commuter hours as well as often during mid-day, right now.** This is one of the few boulevards that intersect Irvine and adjacent cities east to west. With the significant number of new homes going in at the Great Park Neighborhoods, whose density zoning has been allowed to triple in the last five years, Irvine Blvd. and Sand Canyon, north and south, east and west, are heavily impacted—I dare say congested—nearly most of the day, and “impossible” to traverse easily within peak hours. **Adding additions of 30-60 trucks MORE a day would significantly impact those of us that live in the proposed composting project's are of influence.** While I support wholeheartedly the notion of composting recyclable waste, I am opposed to the city, the county, **NOT FINDING ALTERNATE ROUTES FOR TRUCKS**, or in some way enabling trucking to/from the proposed site that does not aggravate existing roads and residential traffic. We can illusion no negative impact; but the facts will eventually speak for themselves.

The designated haul routes for waste hauling vehicles going to and coming from the FRB Landfill are I-405, I-5, Sand Canyon Avenue, Portola Parkway and Bee Canyon Access Road. Haulers have been reminded that Irvine Boulevard or other unauthorized roadways are not a designated access routes to and from the landfill. The actual number of new vehicles going to and coming from the proposed Bee Canyon Greenery composting operation will be 22 vehicles (44 trips total – 22 in and 22 out), associated with transporting finished compost materials to end markets.

Once again, you beat a dead horse. Truckers well know they can get away with using non-designated streets at certain intervals because these are not patrolled regularly. They also know that Sand Canyon has many lights and thus slows their return to wherever. Use of Ridge Route, Irvine Blvd. both east and west to get to the 133 is a time saving move. This is beyond the issues of congestion already stated and re-stated above, **on Sand Canyon, on Portola, on other streets truckers 'use'.**

4. **The Project admits,**

“Project access was analyzed based on the City's Transportation Design Procedures (TDPs, adopted in February 2007).” [Executive Summary, p.1]

These data are woefully out of date, as any urban traffic planner would concede. Irvine's traffic, turn lane usages, etc., have exponentially grown in the last 12 years. Utilizing 12-year old figures for projections **makes no sense, unless one wanted to paint a minimized impact effect.**

Thus they can conclude,

“On the basis of the results of this analysis, the project can be implemented without impacting the design or operation of the surrounding roadway system. An evaluation of intersection LOS shows that the addition of project traffic to the Short-Term Interim Year conditions would not significantly impact the study area intersections, according to the City of Irvine performance criteria.”

I seriously challenge this conclusion. Get the right and updated figures, recalculate using verifiable traffic camera data (which was not present in 2007!), speak to people in the impact areas, and one will get significantly different results.

The Draft MND, Appendix G Traffic Impact Analysis, was prepared using the City of Irvine's Transportation Design Procedures (TDPs). These are the City of Irvine approved criteria for which access driveways and intersections are to be evaluated. They are not data or traffic volumes from 2007. The traffic study analysis utilized existing 2019 traffic data for baseline conditions.

Maybe the city ought to be urged by the county to use other existing road information beyond that purported as used by truckers. You aren't getting a clear picture of the challenges residents of this area face with truckers! You aren't getting a clear picture of how adding more trucks at whatever hours these choose to haul – *since you have no control over when these hauls occur*, would give implementers better data. Remember, just by stating that the presumed hauls ought occur at particular timeframes does in no way attest to the reality that truck hauls are occurring all day long, and *at the very peak hours in droves!* Check your camera data *and count*. Sitting at two lights on Sand Canyon between the north and south entrances of I-5 on a Monday morning, my wife and I counted 14 trucks at the height of rush hour: 8:23a.

While I would love to support a project that seems forward-looking regarding our ever-accumulating waste, I would have to insist that planners and councilmembers do *due diligence* in looking for alternative truck routes, ones that do not already impact a significantly problematic series of boulevards and intersections, precisely at the cusp of Irvine's most densely developing quadrant.

It seems you reply supports the notion that you are doing your job—and that that job is sufficient to quell the ongoing problems of traffic in and through Irvine, not to mention the expansion of a waste facility to now include a composting entity. You repeat insignificant information and skirt the issue that adding more truck trips to already clogged streets needs a better answer than "what currently exists doesn't need to be counted."

And, county and city councilmembers reading this: Where are YOU on this?

Irvine residents need better answers and more thorough acknowledgements of the "truck problem" to and from FRB and proposed composting plant!

Sincerely,

Vincent E. Gil, Ph.D., FAACS
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