
4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.2 LAND USE

ENVIRONMENTAL SETTING

The Bradley Landfill and Recycling Center (BLRC) is a Class III (non-hazardous) municipal solid waste disposal and recycling facility located at 9227 Tujunga Avenue in the Sun Valley community of the City of Los Angeles. The BLRC site is irregularly shaped and roughly bounded by a City of Los Angeles Department of Water and Power transmission line right-of-way, Glenoaks Boulevard, Tujunga Avenue, Peoria Street, Bradley Avenue and the Southern Pacific Railroad/MetroLink rail line. The BLRC is a 209 acre facility that consists of two sub-areas: Bradley West/West Extension and Bradley East (see Figure 3-1, in Section 3.0, Environmental Setting). Regional access to the project site is provided by the Golden State Freeway (I-5) and the Hollywood Freeway (SR 170).

Bradley West/West Extension are the areas of the landfill that are actively receiving municipal solid waste for disposal. Under the General Plan, the area is designated as “Heavy Industrial.” Bradley West/West Extension are currently zoned as M2-1, M2-1G, and M3-1G (Industrial) (see Figure 4.2-1). Bradley East is covered by 7 to 30 feet of low permeability earthen cover and is currently used for wood and green waste recycling activities, landfill operation support, and electrical generation using landfill gas. Under the General Plan, Bradley East is also designated as “Heavy Industrial”.

Land use entitlements for the Bradley Landfill are provided under a Zone Variance granted by the City of Los Angeles (Case No. ZA 94-0792(ZV)(PAD)) on June 2, 1998. Bradley West/West Extension currently operates under a SWFP issued by the City of Los Angeles Department of Environmental Affairs (Solid Waste LEA) and concurred by the California Integrated Waste Management Board (CIWMB) (Permit No. 19-AR-0008). The City Zone Variance is valid until April 14, 2007. The SWFP has no expiration date. Operations on Bradley East are conducted under SWFP 19-AR-0004 and City Zone Variance ZA 94-0792(ZV).

Surrounding Land Uses

The land uses immediately surrounding the BLRC consist primarily of industrial activities. These industrial land uses include: both active and closed landfills, auto salvage yards, manufacturing and assembly activities, warehouses and distribution facilities, inactive sand and gravel pits, and aggregate processing plants. The nearest residential unit is located approximately 75 feet from the edge of the property boundary in an area that is currently zoned M1-1. Another residence is also located in this area approximately 225 feet from the property boundary. The two residences located in this area are considered by the City to be legal non-conforming uses.

Figure 4.2-1, Landfill Zoning Designations

The nearest area zoned for residential use is located approximately 350 feet to the southwest of the landfill, across San Fernando Road from the project site. A predominantly single family residential area is located to the east of the BLRC site, across Glenoaks Boulevard and extending to the Foothill Freeway (Interstate 210). Table 4.2-1 provides a list of the closest sensitive receptors and their respective distances to various portions of the property. These uses are depicted on Figure 2-5 in Section 2.0, Environmental Setting.

**Table 4.2-1
Sensitive Receptors and Their Respective Distances from the Project Site**

Map No.	Use	Distance in Feet			
		Site Boundary	Existing Landfill	Proposed Landfill Expansion	Proposed TS/MRF
1	Residence 1	75	150	500	950
2	Residence 2	225	300	650	900
3	Residences to Southwest	350	900	1,400	700
4	Apartment Complex	1,500	1,550	2,000	2,700
5	Elementary School	1,800	2,350	2,850	2,150
6	Residences adjacent to Stonehurst Recreation Center	1,750	1,800	2,550	5,340

Land Use Policies and Regulations

The General Plan of the City of Los Angeles provides general guidelines on land use issues and planning policy for the entire City. All development activity on-site is subject to the land use regulations of the Sun Valley-La Tuna Canyon Community Plan and the City of Los Angeles Planning and Zoning Code (City Zoning Code). Additionally, the City of Los Angeles General Plan Framework, adopted in December 1996, provides guidance on land use issues related to potential on-site development.

The Proposed Project site is located within the Sun Valley Community of the City of Los Angeles and is subject to the development regulations and policies set forth in the City of Los Angeles General Plan and the City Zoning Code. The project site is also located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization that has prepared the Regional Comprehensive Plan and Guide (RCPG) to address issues of regional growth. The Proposed Project site is also located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Each of these plans and relevant policies is discussed below in relation to the Proposed Project.

City of Los Angeles General Plan

The California Government Code requires each city and county to have a planning agency to develop a General Plan and regulations pertaining to it. Each General Plan lays out the planning goals for the locale, identifies specific districts with special features, such as historic districts or market districts, and outlines what uses are consistent with the General Plan goals.

The City of Los Angeles General Plan underwent its most recent comprehensive update in 1996. It sets forth goals and policies for the future development of the City and designates the location of desired future land uses within the City. The General Plan Land Use designation for the project site is Industrial. The area surrounding the landfill is designated as Agricultural, Public Facilities, Commercial, Industrial and Residential (see Figure 4.2-2). The General Plan consists of 11 elements that apply citywide and the Land Use Element made up of 35 local areas known as Community Plans plus plans for the Los Angeles International Airport and the Port of Los Angeles. Of these elements, the following include goals and policies that are pertinent to the development of the Proposed Project: Framework Element, Housing, Noise, Air Quality, Transportation, Conservation, and Safety. Policies associated with the Land Use Element are discussed below under the “Community Plan” heading.

Framework Element

The General Plan Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the Community Plan and Citywide Elements. The Framework Element responds to State and Federal mandates to plan for the future. The Framework Element supersedes Concept Los Angeles and the Plan citywide elements of the City of Los Angeles General Plan, and sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments to the City’s Community Plans, zoning ordinances, and other pertinent programs.

While the Framework Element incorporates a diagram that depicts the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, it does not convey or affect entitlements for any property. Specific land use designations are set forth in the Community Plans. The Framework Element provides guidelines for future updates of the City’s Community Plans. It does not supersede the more detailed community and specific plans. The following policies from the Framework Element are applicable to the Proposed Project.

Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City’s population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

Policy 3.1.9: Assure that fair treatment of people of all races, cultures, incomes, and education levels with respect to the development, implementation and enforcement of environmental laws, regulations, and policies, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in early planning stages through notification and two-way communication.

4.2-2, General Plan Land Use Designations

Policy 3.4.2: Encourage new industrial development in areas traditionally planned for such purposes generally in accordance with the Framework Long-Range Land Use Diagram and as specifically shown on the community plans.

Policy 3.14.1: Accommodate the development of industrial uses in areas designated as “Industrial Light”, “Industrial-Heavy” and “Industrial Transit” in accordance with Tables 3-1 and 3-9 (see below). The range and intensities of uses permitted in any area shall be determined by the community plans.

**Table 3-1
Land Use Standards and Typical Development Characteristics**

Category	Typical Characteristics/Uses	Discouraged Uses
<i>Industrial</i>		
Industrial – Light	<ul style="list-style-type: none"> • Industrial uses with potential for a low level of adverse impacts on surrounding land uses • Increased range of commercial uses that <i>support</i> industrial uses (through zoning amendments) • Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan) 	
Industrial – Heavy	<ul style="list-style-type: none"> • Industrial uses • Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan) 	
Industrial – Transit	<ul style="list-style-type: none"> • Industrial uses with higher levels of employment that would benefit from proximity to public transit • Increased range of commercial uses that <i>support</i> industrial uses (through zoning amendments) 	
<p><i>Note: The information presented in this table is part of Table 3-1 presented on page 3-14 of the City of Los Angeles Framework Element. The entire table presents the same categories of information for the general land use types (e.g., residential, mixed-use, open space, etc).</i></p>		

Table 3-9

Land Use Designation	Corresponding Zone
Industrial – Light	CM, MR 1, MR 2, M1, M2
Industrial – Heavy	M3
Industrial – Transit	CM, M1, M2, C2

Policy 7.2.14: Take steps to assure that new industries developed are sensitive to environmental and conservation issues, and that cumulative environmental impacts are addressed.

Policy 9.2.1: Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.

Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.

Policy 9.3.2: Consider the use of treated wastewater for irrigation, groundwater recharge, and other beneficial purposes.

Policy 9.9.7: Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.

Policy 9.29.2: Promote the responsible use of natural resources, consistent with City environmental policies.

Policy 9.29.3: Promote conservation and energy efficiency to the maximum extent that is cost effective and practical, including potential retrofitting when considering significant expansion of existing structures.

Policy 9.29.7: Encourage additional markets for electrical energy, such as environmentally friendly alternative fuel for transportation in electric buses and light-duty vehicles.

Housing

The Housing Element was adopted by the City Council on December 18, 2001 and approved by the State of California Department of Housing and Redevelopment on February 27, 2002. The following policies of the General Plan Housing Element would be applicable to the Proposed Project.

Policy 2.3.5: Whenever possible, assure adequate health-based buffer zones between residential and emitting industries and other uses which are potentially incompatible with a healthful living environment. Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents.

Policy 3.1.7: Assure fair treatment of people of all races, cultures, incomes and education levels with respect to the development, implementation and enforcement of environmental laws, regulations, and policies and with respect to opportunities for a healthful living environment.

Noise

The Noise Element was approved by the City Planning Commission on November 12, 1998 and adopted by the City Council on February 3, 1999. The following policy of the General Plan Noise Element would be applicable to the Proposed Project.

Policy 2.2: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Air Quality

The Air Quality Element was approved by the City Planning Commission on June 20, 1991 and adopted by the City Council on November 24, 1992. The following policies of the General Plan Air Quality Element would be applicable to the Proposed Project:

Policy 1.3.1: Minimize particulate emissions from construction sites.

Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

Policy 5.1.2: Effect a reduction of energy consumption and shift to non-polluting sources of energy in its buildings and operations.

Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.

Policy 5.2.1: Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel powered vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.

Transportation

The Transportation Element of the Los Angeles General Plan was adopted by the City Council on September 8, 1999. The following policies of the General Plan Transportation Element would be applicable to the Proposed Project:

Policy 2.7. Encourage businesses to implement telecommuting, flexible work schedules, and teleconferencing programs.

Policy 2.8. Continue to integrate transit and environmental planning to enhance environmental preservation.

Policy 2.35. Actively support Intelligent Transportation System Technology relating to traveler information and the management of transportation systems, such as smart highways and smart vehicles; and focus smart corridor implementation on HOV freeway segments.

Policy 2.36. Actively support reasonable mandates for zero-emissions vehicle (ZEV) production and market penetration and as well as provide adequate support facilities where feasible.

Policy 2.37. Actively support reasonable mandates for alternative fuel vehicle (AFV i.e. low emission vehicles) production and market penetration.

Policy 3.1. Streamline the traffic analysis and mitigation procedures for development applications.

Policy 3.2. Develop flexible standards and criteria for the assessment of significant transportation impacts within regional centers, community centers and major economic activity areas as well as along mixed use boulevards, so long as the impacts to any nearby lower density residential areas are not significant or are minimized.

Policy 3.3. Encourage the use of the Los Angeles County Congestion Management Program Toolbox trip reduction assumptions in calculating and mitigation transportation impacts for development applications for projects to be located in regional centers, major economic activity areas, community centers or along mixed use boulevards.

Policy 3.11. Develop programs for new development to implement both transportation improvements and demand reduction program which mitigate the circulation impacts attributable to new development in accordance with State nexus legislation and judicial findings.

Policy 7.3. Assure the fair and equitable treatment of people of all races, cultures, incomes and education levels with respect to the development and implementation of citywide transportation policies and programs, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in the planning and monitoring process through notification and two-way communication.

Conservation

The Conservation Element of the Los Angeles General Plan was approved by the City Planning Commission March 10, 2001 and adopted by the City Council on September 26, 2001. The Conservation Element surveys laws, requirements, and procedures which have been established for protection of natural resources. It primarily is an information document which is designed to help readers understand the context, history and opportunities for protection and improvement of the City's natural resources.

Policy 18.1: Continue to implement the provisions of the California Surface Mining and Reclamation Act (Public Resources Code Section 2710 et seq.) so as to establish extraction operations at appropriate

sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation, and reuse of closed sites.

Policy 19.1: Continue to encourage energy conservation and petroleum product reuse.

Safety

The Safety Element was approved by the City Planning Commission on August 8, 1996 and approved by the City Council on November 26, 1996. The following policy from the Safety Element is applicable to the Proposed Project.

Policy 1.1.4: Health/Environmental Protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.

Community Plan

The Proposed Project site is located within the boundaries of the Sun Valley – La Tuna Canyon Community Plan. The Sun Valley – La Tuna Canyon Community Plan Area lies in the northeast quadrant of the City of Los Angeles, approximately 15 miles from downtown. Sun Valley – La Tuna Canyon covers approximately 10,618 acres (17 square miles) and includes the following larger land use areas: 26% single-family residential, 22% open space, and 18% industrial space. The community incorporates the highest concentration of mineral processing facilities in the City of Los Angeles, with rock and gravel mining operations as well as cement and concrete processing.

According to the Community Plan, approximately 18% of the Sun Valley – La Tuna Canyon’s acreage is designated for industrial uses. Industry in the area benefits from easy access to the Golden State Freeway (I-5), the Hollywood Freeway (Highway 170), railroad lines that transverse the community and the close proximity to the Burbank-Glendale-Pasadena Airport.

According to the Community Plan, “Exhausted mining operations include CalMat’s Trout/Schweitzer Pond and Peoria Street Site, Los Angeles By-Products Company’s Strathern Street Site and the Bradley Landfill. Both the Peoria Street Site and the Strathern Street Site are being filled with inert landfill material...Once filled, the site will be converted into a state of the art recycling center – the “Sun Valley Recycling Park of Los Angeles”.

The following policies from the Sun Valley – La Tuna Canyon Community Plan (Land Use Element) are applicable to the Proposed Project.

Policy 3-1.3: Adequate mitigation should be achieved through design treatments and compliance with environmental protection standards, for industrial uses where they adjoin residential neighborhoods and commercial uses.

Policy 3-1.4: The utilization of sand and gravel areas shall be conducted in such a way as to conserve sand and gravel resources for future availability and use, minimize the impact of extractive activities upon residential and commercial areas, and provide for the reclamation and reuse of exhausted pits.

Policy 8-2.1: Insure that landscaping around building be placed so as not to impede visibility.

Policy 8-2.2: Insure adequate lighting around residential, commercial, and industrial buildings in order to improve security.

Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

In addition to the policies listed above, the Community Plan has established design standards for a variety of land uses including Industrial and Industrial/Residential Interface areas.

Zoning Code

Development on the project site is governed by the Zoning Code for the City of Los Angeles. Along with the General Plan designations, the zoning codes establish permitted uses and development standards for all new development occurring within the City. The project site is zoned as M2-1, M2-1-G and M3-1-G.

The types of uses permitted under the M2 zoning designation include airport or aircraft landing fields, automobile dismantling, junk yards, open storage of materials and equipment, morgue, stables, rifle ranges, parking, etc. These uses are allowed outright or allowed under certain conditions. However, Section 12.19A.15 allows “curing, composting and mulching facilities, including all accessory buildings, as well as chipping and grinding facilities when conducted within a wholly enclosed building. The zoning code specifically prohibits “use[s] which are or may become obnoxious or offensive by reason of emission of odor, dust, smoke, noise, gas, fumes, cinders, vibration, refuse matter or water-carried waste, as determined by the Administrator” (Section 12.19A.12).

Under the M3 zoning designation the following uses are allowed: uses allowed under the M2 zoning designation with some exceptions, acetylene gas manufacture/store, alcohol manufacture, blast furnace/coke oven, chemical manufacture, brick/tile/terra cotta manufacture, fish smoking/curing/canning, ore reduction, quarry stone mill, railroad repair shops, salt works, wool pulling, etc. In addition, Section 12.20A.37 allows “uses which may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise, vibration, and the like; provided, however, that none of the following uses shall be located nearer than five hundred (500) feet to a more restricted zone.” These uses include (i) garbage, offal, or dead animal dumping and (j) gas manufacture.

Additionally, the City of Los Angeles, Department of Building and Safety determined in letter dated September 30, 2003, that “a “material recovery facility” appear to be similar to a “recycling materials

sorting facility.” Recycling Materials Sorting Facilities are permitted in the M3 Zone without obtaining a conditional use permit...”¹

Regional Comprehensive Plan and Guide

The City of Los Angeles is located within the planning area of the Southern California Association of Governments (SCAG). The Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 by the member agencies of SCAG to set forth goals for the Southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond. It includes input from each of the 13 subregions that make up the Southern California region (comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura Counties). The project site is located within the Los Angeles subregion, which encompasses the Cities of Los Angeles and San Fernando and the unincorporated areas of Los Angeles County.

Adopted RCPG policies related to land use are contained primarily in Chapter 3 of the RCPG, entitled Growth Management. The primary goal of Growth Management Chapter policies is to address issues related to growth and land consumption by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources and enhance the quality of life in the region. Specific Growth Management policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political, and cultural equity. Additional applicable RCPG policies related to land use are included in Chapter 5, Air Quality; Chapter 11, Water Quality, and in the Solid Waste Management Goals and Objectives. Policies which have been identified by SCAG as pertinent² to the Proposed Project are discussed in the Environmental Impact section below.

Air Quality Management Plan

The Proposed Project site is located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies. The Air Quality Management Plan (AQMP), most recently adopted in 2003 by SCAQMD and SCAG to assist in fulfilling these responsibilities, is intended to establish a comprehensive air pollution control program leading to the attainment of State and Federal air quality standards in the SCAB, thereby addressing the requirements set forth in the State and Federal Clean Air Acts. Section 4.4, Air Quality, provides a specific discussion of AQMP policies and the project’s conformance with such policies.

¹ *City of Los Angeles Department of Building and Safety, Peter Kim, Zoning Engineer, Letter to Lily Lee, Waste Management, regarding 9227 N. Tujunga Avenue (APN 2538009008), September 30, 2003.*

² *These policies were identified in a letter from the Southern California Association of Governments, dated May 7, 2003. A copy of this letter is provided in Appendix B-1.*

Water Quality Control Plan Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan 1) designates beneficial uses for surface and ground waters; 2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; and 3) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Basin Plan is reviewed and updated as necessary. Following adoption by the Regional Board, the Basin Plan and subsequent amendments are subject to approval by the State Board, the State Office of Administrative Law, and the United States Environmental Protection Agency.

The Basin Plan identifies specific objectives and incorporates by reference plans and policies which meet the goals identified above. The specific objectives of the Basin Plan which are applicable to the Proposed Project are identified below. Additional information regarding the Basin Plan can be found at www.swrcb.ca.gov/rwqcb4/html/meetings/tmdl/Basin_plan/basin_plan_doc.html.

Regional Objectives for Ground Water

1. In ground waters used for domestic or municipal supply (MUN) the concentration of coliform organisms over any seven day period shall be less than 1.1/100 ml.
2. Ground waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.

3. Numerical mineral quality objectives for individual groundwater basins are contained in Table 3-10. (the numerical objectives from this table for the San Fernando Valley are presented below)

DWR Basin No. ¹	Basin	Objectives (mg/L)			
		TDS	Sulfate	Chloride	Boron
4-12	<u>San Fernando Valley</u>				

Sylmar Basin	600	150	100	0.5
Verdugo Basin	600	150	100	0.5
San Fernando Basin				
West of Highway 405	800	300	100	1.5
East of Highway 405 (overall)	700	300	100	1.5
Sunland-Tujunga area ²	400	50	50	0.5
Foothill area ²	400	100	50	1.0
Area encompassing RT-Tujunga- Erwin-N. Hollywood-Whithall- LA/Verdugo-Crystal Springs- Headwords-Glendale/Burbank Well Fields	600	250	100	1.5
Narrows area (below confluence of Verdugo Wash with the LA River)	900	300	150	1.5
Eagle Rock Basin	800	150	100	0.5

1. Basins are numbered according to Bulletin 118-80 (Department of Water Resources, 1980).

2. The category for the Foothill Wells area in the previous Basin Plan incorrectly groups groundwater in the Foothill area with groundwater in the Sunland-Tujunga area. Accordingly, the new categories, Foothill area and Sunland-Tujunga area, replace the old Foothills Wells area.

4. Ground waters shall not exceed 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen (NO₃-N + NO₂-N), 45 mg/L as nitrate (NO₃), 10 mg/L as nitrate-nitrogen (NO₃-N), or 1 mg/L as nitrite-nitrogen (NO₂-N).
5. Ground waters shall not contain taste or odor-producing substances in concentrations that cause nuisance or adversely affect beneficial uses.

Los Angeles County Countywide Siting Element

The California Integrated Waste Management Act of 1989 (AB 939), as amended, requires each county to prepare a countywide siting element which identifies how the county and the cities within the county will address the need for 15 years of disposal (landfill and/or transformation) capacity to safely handle solid waste generated in the county which remains after recycling, composting, and other waste diversion activities. AB 939 has recognized that landfills and transformation facilities are necessary component of any integrated solid waste management system, and an essential component of the waste management hierarchy. AB 939 establishes a hierarchy of waste management practices in the following order and priority: 1) source reduction; 2) recycling and composting; and 3) environmentally safety transformation/land disposal.

As mandated by AB 939, the County of Los Angeles Countywide Siting Element (CSE) establishes goals, policies, and guidelines for proper planning and siting of solid waste transformation and land disposal facilities on a countywide basis. It offers strategies and establishes siting criteria to be used as an aid to evaluate sites proposed for development of needed solid waste transformation and land disposal facilities. In accordance with State law, the purpose of the CSE for the County of Los Angeles is to address the

management of that portion of solid waste that remains after the 88 cities in Los Angeles County and the County unincorporated communities have completed their recycling, composting, and other waste diversion activities for each year of the 15-year planning period. The objectives of the CSE are the goals and policies delineated in Chapter 2 of the CSE. The goals are as follows:

1. To protect the health, welfare, and safety of all citizens by addressing the disposal need of the 88 cities and the county unincorporated communities in Los Angeles County during the 15-year planning period through development of environmentally safe and technically feasible disposal facilities for solid waste which cannot be reduced, recycled, or composted.
2. To foster the development of transformation and other innovative solid waste disposal technologies as alternatives to land disposal.
3. To protect the economic well-being of Los Angeles County by ensuring that the cities and the county unincorporated communities are served by an efficient and economical public/private solid waste disposal system.
4. To provide siting criteria that considers and provides for the environmentally safe and technically feasible development of solid waste disposal facilities.
5. To reduce the volume (tonnage) of solid waste requiring land disposal or transformation by continuing to implement and expand source reduction, recycling, composting, and public education programs.
6. To conserve Class III landfill capacity through diversion of inert waste, disposal of inert waste at unclassified landfills, increase waste disposal compaction rate, and the use of green waste and other appropriate materials for landfill daily cover.
7. To promote and encourage waste diversion activities at disposal facilities.
8. To promote adequate markets for recycled materials and compost products.

The following policies of the Los Angeles County Countywide Siting Element are applicable to the Proposed Project.

Policy 2.4.1-6. The cities in Los Angeles County and the County will promote land use policies to discourage incompatible land uses between the existing, expansion of existing, and new solid waste management facilities identified in the CSE and adjacent areas.

Policy 2.4.1-10. The cities in Los Angeles County, the County, and the Task Force will support and coordinate the development of infrastructure necessary for solid waste transfer and rail loading to out-of-County/remote disposal facilities.

Policy 2.4.2-1. The cities in Los Angeles County, the County, the CSD, and the Task Force will support and coordinate the development of transformation, and other innovative waste disposal technologies

which would reduce dependence on landfills while providing for the solid waste disposal need of Los Angeles County residents at a reasonable cost.

Policy 2.4.3-3. The cities in Los Angeles County and the County will encourage both public and private sector participation in finding solutions to meet Countywide solid waste disposal challenges.

Policy 2.4.4-3. It will be the cities in Los Angeles County, the County, and the Task Force's policy to ensure appropriate public participation in land use permitting decisions pertaining to the development of disposal facilities.

Policy 2.4.4-5. The cities in Los Angeles County and the County, through their respective Local Enforcement Agencies, will work toward achieving uniform compliance with all Federal, State, and local environmental regulations at all existing solid waste land disposal transformation facilities.

Policy 2.4.5-1. The cities in Los Angeles County and the County will continue to implement and maintain commercial and residential recycling, composting, public outreach, and other equivalent programs in their jurisdictions.

Policy 2.4.5-2. The County will implement, maintain, and where appropriate, expand the Countywide Yard Waste Management Program in coordination with the cities in Los Angeles County.

Policy 2.4.7-1. The cities in Los Angeles County, the County, the Task Force, and Local Enforcement Agencies, as part of their permit/Finding of Conformance process, will encourage all disposal facility operators within their jurisdictions to institute waste salvage/diversion operations in compliance with all applicable rules and regulations. The waste salvage/diversion operations shall recover those waste materials which can be feasibly and economically reused, recycled or composted.

Policy 2.4.7-2. The cities in Los Angeles County, the County, the Task Force, and Local Enforcement Agencies as part of their permit/Finding of Conformance process will require all disposal facility operators to acquire and provide to the County all data necessary for cities in Los Angeles County and the County to comply with the mandates of the California Integrated Waste Management Act of 1989 (Assembly Bill 939), as amended.

Congestion Management Program

The Congestion Management Program (CMP) is a State-mandated program enacted by the State legislature to address the increasing concern that urban congestion is affecting the economic vitality of the State and diminishing the quality of life in many communities. As a new approach to addressing congestion concerns, the CMP was created to: (1) link land use, transportation, and air quality decisions; (2) develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel; and (3) propose transportation projects which are eligible to compete for State gas tax funds.

The CMP, as adopted in 1992 and revised in 2004, includes a system of highways and roadways with minimum level of service (LOS) standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven year capital improvement program, and a countywide computer model to evaluate traffic congestion and recommend relief strategies and actions. The CMP incorporates procedures for meeting deficiency plan requirements, or strategies that mitigate or improve congestion and air quality. Proposed projects which have the potential to affect the designated CMP network (mostly main-line freeway segments) are required to identify and mitigate their adverse effects on the network. Section 4.3, Transportation/Circulation, provides an analysis of the Proposed Project's potential impact on the CMP network.

ENVIRONMENTAL IMPACT

Thresholds of Significance

The following thresholds of significance apply to the Proposed Project.

Land Use Compatibility

A significant land use impact is one where development of the project would place incompatible land uses next to one another or in proximity where a land use can affect another use. The determination of a particular project's land use compatibility with area development is based on surveying the land uses in the vicinity and analyzing the specific operational characteristics of the Proposed Project.

According to Appendix G of the State CEQA Guidelines, a project may have a significant land use impact if the Proposed Project would:

- a. Physically divide an established community;
- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- c. Conflict with an applicable habitat conservation plan or natural community conservation plan.

Project Impacts and Mitigation

Phase I – Transitional Vertical Expansion

Land Use Compatibility

Impact 4.2-1: The Transitional Vertical Expansion of the Bradley Landfill would be generally compatible with the surrounding land uses. (Less Than Significant)

Phase I of the Proposed Project would allow the Bradley Landfill to expand the maximum height of the landfill by 43 feet to 1,053 feet above msl. This expansion would allow the landfill to continue operations while it converts to a TS/MRF. The construction of the TS/MRF would also occur during Phase I of the Proposed Project. These activities would occur on Bradley West/West Extension.

As described above, the existing Bradley Landfill is surrounded primarily by industrial uses. Immediately adjacent to the Bradley landfill are other landfills/gravel mines/industrial uses, the LADWP, and commercial uses along San Fernando Road. The nearest area zoned for residential uses is located approximately 350 feet away from the property boundary (see Figure 4.2-1). The two closest residences to the property boundary are approximately 75 and 225 feet away in an area that is zoned for Industrial. The residences located in the industrial zone are considered to be legal non-conforming uses.

The increase in the maximum height of the landfill would not change the operations and procedures of the existing landfill. These procedures are discussed in detail in Section 4.4, Air Quality; Section 4.5, Noise; Section 4.7, Geology and Soils; Section 4.8, Hydrology; and Section 4.9, Hazardous Materials. Since no changes would occur in the procedures governing the operation of the landfill, the landfill would continue to be compatible with the immediately surrounding land uses.

Mitigation Measures: No mitigation measures are required.

Impact 4.2-2: Construction of the proposed TS/MRF would be compatible with the surrounding land uses and would not generate any significant, unmitigatable impacts with respect to traffic, air quality, noise, and aesthetics. (Less Than Significant)

Construction activities associated with Phase I of the Proposed Project would occur approximately 700 feet from the nearest residence, shielded from the surrounding area by mature trees, and are unlikely to be noticed by area residents and visitors with the exception of the increased truck traffic. Therefore, no land use compatibility impacts associated with the proposed TS/MRF construction are anticipated to occur.

While the proposed TS/MRF is compatible with the immediately surrounding land uses, some effects associated with the proposed TS/MRF would extend beyond those properties immediately adjacent to the landfill. Additionally, some of the effects from the construction activities (e.g., dust and noise) could extend beyond the boundaries of the Bradley Landfill. These include effects to traffic/transportation, air quality, noise, and aesthetics. Impacts to these resource areas associated with the proposed vertical expansion and construction of the proposed TS/MRF are discussed in Sections 4.3, 4.4, 4.5, and 4.6, respectively. Included in these discussions are existing regulatory requirements and mitigation measures and any proposed mitigation measures. Operation of the Bradley Landfill with respect to hazardous materials is discussed in Section 4.9.

Mitigation Measures: No mitigation measures are required.

Impact 4.2-3: Phase I activities proposed for Bradley East are compatible with the existing, surrounding land uses and no impacts are anticipated as a result of these activities. (No Impact).

During Phase I on Bradley East, activities would include the expansion of the existing green and wood waste operation and changes to the existing MRF operation. The green and wood waste operation and the existing MRF operation would be expanded to accommodate additional quantities of material. The expansion of these operations would occur in the existing locations; however, no changes would occur in the way that they are operated.

Therefore, no land use compatibility impacts are anticipated as a result of proposed activities on Bradley East under Phase I of the Proposed Project.

Mitigation Measures: No mitigation measures are required.

Impact 4.2-4: Phase I of the Proposed Project would be generally consistent with the goals and policies of the following adopted plans: City of Los Angeles General Plan, SCAG's Regional Comprehensive Plan and Guide, the LARWQCB Basin Plan, and the Los Angeles County Siting Element. (Less than Significant)

Phase I of the Proposed Project would allow for the transitional vertical landfill expansion to occur on Bradley West/West Extension. This expansion would allow the maximum height of the landfill to increase by 43 feet from 1,010 to 1,053 feet above msl. Additionally, this Phase would also encompass activities associated with the construction of a new 4,000 tpd TS and a 1,000 tpd MRF adjacent to the existing landfill. Proposed Phase I activities on Bradley East would include expansion of the existing green and wood waste operation and changes to the existing MRF operation.

Consistency of these activities with the applicable plans and policies is discussed below. Phase I activities, as identified above, would be consistent with both the General Plan and the RCPG.

City of Los Angeles General Plan

Phase I of the Proposed Project would not conflict with any of the applicable policies of the City of Los Angeles General Plan and would work to implement a number of those policies.

Framework Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Framework Element and would implement a number of those policies as discussed below.

- Phase I of the Proposed Project would allow the Bradley Landfill to extend the height of the landfill by 43 feet. This would allow the landfill to continue to operate and accept trash for disposal until the expiration date of land use permits in 2007, providing needed short-term sanitary landfill disposal capacity to serve residences and businesses within the City of Los Angeles. In addition to the extension of the landfill height, Phase I would include the construction of the new TS/MRF and the expansion of the existing green waste operation. These activities would allow BLRC to continue to provide much needed solid waste processing services to the City of Los Angeles. (Policy 3.1.2)

- Section 5.4 of this EIR discusses the potential for disproportionate adverse impacts to groups of individuals based on their race and/or income level. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability (NOA) of the Draft EIR to the public was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 3.1.9)
- Phase I of the Proposed Project is not a new industrial development; it is the continuation and transitional expansion of an existing use. This land use, and specifically the Bradley Landfill, is called out in the Sun Valley – La Tuna Canyon Community Plan. The proposed height expansion of the landfill and construction activities associated with Phase I are consistent with the policies identified in the Community Plan (see below). (Policies 3.4.2 and 3.14.1)
- This EIR was prepared to identify and address the environmental issues associated with the Proposed Project. As part of Phase I, the maximum height of the landfill would be extended by 43 feet, construction would begin on the new TS/MRF, the existing green waste and MRF operations would be expanded, and conversion of the fleet of trash trucks to low emission alternatives would begin. Issues identified as potentially significant included traffic, air quality, noise, aesthetics, geology, hydrology, hazardous materials, and wastewater. These issues are discussed in depth as part of the EIR and the discussion includes mitigation measures to reduce potential impacts. As part of this discussion, cumulative impacts for each issue were addressed in their respective sections (e.g., cumulative impacts associated with air quality can be found in Section 4.4). (Policy 7.2.14)
- Wastewater generated by the Bradley Landfill and stormwater runoff from the project site are collected and treated as required by law and local, State, and federal agencies. The reader is referred to Section 4.8 for a discussion of existing and proposed stormwater containment operations and to Section 4.10 for a discussion of wastewater collection and treatment. No change in the amount of impermeable surfaces would occur as a result of the increase in landfill height and acceptance of up to 7,000 tpd of MSW; therefore, no increase in stormwater runoff is anticipated. Construction and operation of the new TS/MRF may result in an increase in the amount of stormwater runoff, however, implementation of the required Best Management Practices (BMPs) and mitigation measures will ensure that any impacts remain at less than significant levels. Generally, no change in current operations would occur during Phase I activities. (Policy 9.2.1)
- The Bradley Landfill does not accept hazardous wastes for disposal. As described in Section 4.9, trucks entering the landfill are screened to ensure the loads do not contain hazards materials/waste. Water runoff from irrigation and/or storm events is primarily contained on-site and handled in accordance with all applicable laws and regulations. Wastewater (leachate) and landfill gas condensate generated by the landfill is collected and treated as necessary prior to disposal into the sewer system. These activities are conducted in accordance with the requirements of the Industrial Wastewater Permit for the landfill. For an explanation of these

disposal practices see Section 4.10, Utilities - Wastewater. Implementation of the Phase I activities would not change the procedures for screening incoming waste or the manner in which wastewater is handled. (Policy 9.3.1)

- Wastewater (leachate) generated by the Bradley Landfill is disposed of in accordance with the requirements of the landfill's Industrial Wastewater Discharge permit. The increase in the maximum height of the landfill would not change the established procedures for dealing with this wastewater. During operation of the existing landfill and during construction activities, water would be used to control dust that is generated. Water conservation is employed in these activities to the maximum extent feasible. (Policy 9.3.2)
- The Bradley Landfill utilizes water conservation principles in its day-to-day operations. These principles and practices would not change with implementation of Phase I of the Proposed Project. The vegetative cover that is installed is drought resistant and requires less water than other plant species. With the vertical expansion of the landfill, these procedures would remain in place. During construction of the new TS/MRF, any watering of dirt exposed during grading would be accomplished as required by the mitigation measures. Water conservation is employed in these activities to the maximum extent feasible. (Policy 9.9.7)
- Byproducts produced from the decomposition of landfilled refuse primarily include carbon dioxide (CO₂) and methane (CH₄). This gas is currently either flared off through controlled combustion or used to generate electricity under permits issued by the SCAQMD. As part of Phase I activities, a portion of the current refuse collection trucks will either be converted to or replaced by low emission alternatives. (Policy 9.29.2)
- As part of the Phase I activities, a portion of the current refuse collection trucks will either be converted to or replaced by low emission alternatives. This would conserve existing energy sources (fossil fuels) and utilize a fuel that is renewable and more easily obtained than other fossil fuels. (Policy 9.29.3)
- While Phase I of the Proposed Project would not utilize buses or light duty vehicles, it would utilize refuse collection trucks. During Phase I, a portion of the current refuse collection trucks will either be converted to or replaced by low emission alternatives (see Air Quality Data, Appendix F). (Policy 9.29.7)

Housing Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Housing Element and would implement a number of those policies as discussed below.

- Phase I of the Proposed Project involves the transitional vertical expansion of the existing Bradley Landfill. A new landfill would not be created as a result of the Proposed Project. The uses immediately surrounding the landfill are other industrial and commercial uses. While two residences are located within 500 feet of the landfill expansion operations, they are considered

legal non-conforming uses. A residential zone is however, located approximately 350 feet from the boundary of the property line and 1,400 feet from the expansion operations. The placement of the new TS/MRF approximately 700 feet from the nearest residential use provides an adequate health-based buffer zone. (Policy 2.3.5)

- Section 5.4 of this EIR discusses potential adverse impacts to groups of individuals based on their race and/or income level. In general, the preparation of the EIR has been completed in a manner that attempts to disclose all the potentially significant impacts of the Proposed Project and thereby treats all residents fairly. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 3.1.7)

Noise Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Noise Element and would implement a number of those policies as discussed below.

- Noise monitoring is performed at the gas plant and recycling facilities.³ Phase I activities would include raising the maximum height of the landfill, constructing the new TS/MRF, and expansion of the existing MRF and green and wood waste operations. Phase I would also include the conversion of the trash trucks to a low emission alternative. The transitional vertical expansion of the landfill would not increase the existing noise levels at the landfill as no new noise sources would be introduced. Increased noise levels may be generated during construction activities; however, due to compliance with the City Noise Ordinance and the distance between the location of the construction activities and the nearest sensitive receptors, any potential noise increase would be less than significant (see Section 4.5, Noise). Conversion of the trash trucks to a low emission alternative would not generate additional noise impacts. (Policy 2.2)

Air Quality Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Air Quality Element and would implement a number of those policies as discussed below.

- During activities associated with the construction of the TS/MRF, particulate emissions may be generated (e.g., dust from grading). During these operations, mitigation measures would be implemented to reduce the amount of particulate emissions generated. These measures are listed in Section 4.4, Air Quality, under the Mitigation Measures headings. (Policy 1.3.1)

³ Waste Management, *Bradley Landfill & Recycling Center's Report of Disposal Site Information, August 2002.*

- Fugitive dust would be generated by trucks driving on the landfill and on the streets surrounding the landfill. Measures to control particulate emissions from these activities (e.g., watering truck routes on the landfill and street sweeping) are in place and will be continued under the Proposed Project. These procedures would not change as a result of the increase in the height of the landfill and no new particulate emission impacts are anticipated. See Section 4.4, Air Quality, for a detailed discussion of air quality impacts associated with Phase I of the Proposed Project. (Policy 1.3.2)
- As part of Phase I of the Proposed Project, a portion of the current refuse collection trucks will either be converted to or replaced by a low emission alternative. (Policy 5.1.2)
- During Phase I, construction of a new TS/MRF and expansion of the existing green waste facility would occur. These facilities would be utilized upon completion of existing landfill operations (2007) and would allow for increased amounts of recycling and reuse to occur. (Policy 5.1.4)
- During Phase I, a portion of the current refuse collection trucks will either be converted to or replaced by a low emission alternative. (Policy 5.2.1)

Transportation Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Transportation Element and would implement a number of those policies as discussed below.

- While telecommuting and teleconferencing are not viable options for a majority of employees at the Bradley Landfill due to the nature of the work, the employees do work a variety of shifts in order to satisfy the needs of the landfill. This allows the employee trips to be spread out over the course of the day instead of lumped into one or two time periods. No change in the existing procedures regarding work hours is anticipated as a result of increasing the vertical height of the existing landfill, construction activities associated with the new TS/MRF, or the expansion of the existing MRF, and green and wood waste operations. (Policy 2.7)
- A traffic analysis⁴ was completed in order to address potential impacts associated with the implementation of Phase I of the Proposed Project. The recommendations of the traffic analysis have been included in this EIR as mitigation measures in order to reduce potentially significant traffic impacts. Further discussion of traffic impacts can be found in Section 4.3, Transportation/Circulation. A copy of the traffic report can be found in Appendix E. (Policies 2.8 and 3.1)

⁴ Crain & Associates, *Traffic Analysis for the Proposed Bradley Landfill and Recycling Center Transition Master Plan*, August 2005.

- As identified in the traffic report, the applicant would be required to contribute towards funding the City of Los Angeles' expanded signal system improvement where traffic signals are interconnected and known as the Automated Traffic Surveillance and Control (ATSAC)/Automated Traffic Control System (ATCS) at San Fernando Road and Sheldon street. This contribution would help the City actively support intelligent traffic systems. (Policy 2.35)
- As part of the Phase I operations it is anticipated that the fleet of refuse collection trucks owned by Waste Management would either be converted to a low emission alternative or would be modified with devices such as diesel PM₁₀ traps to reduce the amount of emissions generated (see Mitigation Measure 4.4-7 in Section 4.4, Air Quality). (Policies 2.36 and 2.37)
- The criteria for significance used in this EIR are the standard ones utilized by the City of Los Angeles to determine traffic impacts. While traffic impacts associated with Phase I of the Proposed Project were identified, none of these direct impacts would remain significant with incorporation of the identified mitigation measures. In order to determine the future traffic levels for 2007, 2008, and 2012 (project phases), the traffic from known related projects was added. In order to account for general increases in traffic, a 2% growth factor per year was included. Therefore, the discussion of traffic impacts addressed in the document also includes the cumulative traffic impacts. With the implementation of the project-specific traffic mitigation measures, cumulative traffic impacts would also be less than significant. Additionally, none of the impacted intersections are located within residential neighborhoods. (Policy 3.2)
- As part of the traffic analysis prepared for the Proposed Project, the Proposed Project's consistency with the Congestion Management Plan (CMP) was analyzed. The project's impacts on the freeway segments utilized by the BLRC's trucks were analyzed and it was determined that the project would not significantly impact any CMP facilities. A detailed description of the CMP analysis performed for Phase I of the Proposed Project can be found in Section 4.3. (Policy 3.3)
- Mitigation measures were identified which reduce traffic impacts at the three specified intersections. In some instances, the resulting conditions at these intersections, after implementation of the mitigation measures, would be better than without the Proposed Project. (Policy 3.11)
- Section 5.4 of this EIR discusses the potential for disproportionate adverse impacts to groups of individuals based on their race and/or income level. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a community advisory group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 7.3)

Conservation Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Conservation Element and would implement a number of those policies as discussed below.

- The Bradley Landfill was formerly a sand and gravel mine. Upon depletion of the resources in the mine, it was converted into the existing landfill. There are no biological or cultural resources located on the project site. There are also no ecologically important areas immediately adjacent to the landfill. Groundwater under the landfill is protected by following the conditions of their permits and all applicable State, federal and local laws and regulations with respect to landfills. (Policy 18.1)
- Byproducts produced from the decomposition of landfilled refuse primarily include carbon dioxide (CO₂) and methane (CH₄). This gas is currently either flared off through controlled combustion or used to generate electricity under permits issued by the SCAQMD. As part of Phase I activities, a portion of the current refuse collection trucks will either be converted to or replaced by a low emission alternative. (Policy 19.1)

Safety Element

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Safety Element and would implement a number of those policies as discussed below.

- The Bradley Landfill is a Class III landfill and does not accept hazardous materials. A list of materials that is approved for disposal and those materials which are not allowed is provided in Section 4.9, Hazardous Materials. The landfill has procedures in place which ensure that hazardous materials are not disposed of at the landfill. These procedures would remain the same with the increase in height of the existing landfill. During construction of the new TS/MRF, all applicable federal, State, and local laws and regulations would be adhered to with respect to the use and disposal of hazardous materials and wastes (e.g., paints, solvents, etc). (Policy 1.1.4)

Land Use Element (Community Plan for the Sun Valley – La Tuna Canyon Community)

Phase I of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Land Use Element and would implement a number of those policies as discussed below.

- The Bradley Landfill has existing procedures to reduce impacts to nearby receptors from traffic, noise, air quality, hazards, etc. In addition, mitigation measures have been identified to further reduce impacts. These measures are identified in their respective sections of this EIR. (Policy 3-1.3)

- The Bradley Landfill is located on an area that was formerly utilized as a sand and gravel mine. The sand and gravel resources were depleted prior to the development of the landfill and therefore did not impact any potential mining areas. The abandoned pit was converted into the existing landfill. Expansion of the height of the existing landfill and the construction of the new TS/MRF would not impact the areas' ability to be used for mining activities. (Policy 3-1.4)
- No buildings would be constructed as part of the vertical expansion of the landfill. Any landscaping that is placed around the new TS/MRF would be placed so as to not impede visibility. (Policy 8-2.1)
- The appropriate lighting would be placed around the new TS/MRF and greenwaste expansion area. (Policy 8-2.2)
- It was determined through the preparation of an Initial Study (IS) (see Appendix A-3) that the Proposed Project would not produce a significant impact on fire protection services. Additionally, as part of the review process for the Draft EIR, the Fire Department was sent a copy for their review and comment. (Policy 9-1.1)

Regional Comprehensive Plan and Guide

The Regional Comprehensive Plan and Guide (RCPG) includes several policies which could be potentially applicable to Phase I (Transitional Vertical Expansion) of the Proposed Project. These were identified in a letter from the Southern California Association of Governments dated May 7, 2003⁵. Phase I of the Proposed Project's consistency with the identified policies is discussed in Table 4.2-2.

⁵ See Appendix B-1.

**Table 4.2-2
Comparison of Phase I (Transitional Vertical Expansion) Project Characteristics to RCPG Policies**

Policies and Guides	Characteristics of the Proposed Project
<p>Consistency with Regional Comprehensive Plan and Guide Policies</p> <p>3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</p>	<p>Phase I of the Proposed Project is anticipated to add approximately 28 permanent jobs to the local economy, in addition to those already provided by the Bradley Landfill. Impacts to utilities and transportation systems have been addressed in Sections 4.10 and 4.3, respectively. Therefore, Phase I of the Proposed Project would be consistent with this RCPG policy.</p>
<p>Consistency with Growth Management Chapter Policies Related to the RCPG Goal to Improve the Regional Quality of Life</p> <p>3.18 Encourage planned development in locations least likely to cause environmental impact.</p>	<p>The project site is located in an urbanized area and currently contains the existing Bradley Landfill and Recycling Center. Phase I of the Proposed Project would increase the allowable height of the existing landfill by 43 feet. This would allow the landfill to continue operations until the closing date of their permit (April 14, 2007). While the project site is an existing landfill, the transitional vertical expansion would allow impacts to certain resources to continue (e.g., air quality, noise, traffic etc.). However, these impacts would be less than constructing a new landfill somewhere else. Mitigation measures have been provided which would reduce these impacts to the extent feasible. Therefore, Phase I of the Proposed Project would be generally consistent with this RCPG policy.</p>
<p>3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.</p>	<p>There are no known wetlands, woodlands, or land containing unique and endangered plants and animals. The landfill was formerly a sand and gravel mine, which when completely mined left a large hole in the ground. Therefore, the project site is not located on an area which could be used for production lands. The project site is also not located on an area specifically used for groundwater recharge. This phase of the Proposed Project would be consistent with this RCPG policy.</p>
<p>3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>The project site is located in an urbanized and extremely disturbed area. The site was formerly used as a sand and gravel mine and then was converted into the existing landfill. There are no recorded cultural resources or archaeological sites located on the project site and none would be expected to be discovered. No impacts to cultural or archaeological resources are anticipated as a result of implementing Phase I of the Proposed Project. Therefore, this Phase of the Proposed Project would be consistent with this RCPG policy.</p>
<p>3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic</p>	<p>The project site was previously utilized as a sand and gravel quarry and is currently utilized as a landfill. The slopes associated with the landfill are graded 3:1 and</p>

Policies and Guides	Characteristics of the Proposed Project
<p>hazards.</p>	<p>therefore, no steep slopes are located on the project site. The project site is not located in a 500-year floodplain; however, it is located within the boundaries of a 100-year floodplain. While it is located within a floodplain, the landfill is not at risk for flooding due to site design and measures that have been implemented to protect against flooding. For a detailed discussion of these measures and site design features, see Section 4.8, Hydrology. The project site is not located in an area at risk to seismic hazards that are greater than those experienced throughout the rest of Southern California. The project site is also not located in an area at risk to high fire hazards. Therefore, Phase I of the Proposed Project would be generally consistent with this RCPG policy.</p>
<p>3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.</p>	<p>Implementation of Phase I of the Proposed Project would include mitigation measures to address noise impacts. The transitional vertical expansion would be required to conform to all seismic safety requirements to minimize exposure to seismic hazards and would not conflict with any emergency response plans. No mitigation measures are required for biological resources as no impacts would occur to those resources as a result of implementing Phase I of the Proposed Project. Phase I of the Proposed Project would be consistent with this RCPG policy.</p>
<p><u>Consistency with Growth Management Chapter Policies Related to the RCPG Goal to Provide Social, Political, and Cultural Equity</u></p> <p>3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.</p>	<p>Implementation of Phase I of the Proposed Project would allow Bradley Landfill to continue to meet the solid waste needs of the community (City of Los Angeles) until their permit expires on April 14, 2007. It would also allow for the construction of the new TS/MRF and the conversion of the trash trucks to low emission alternatives, permitting the Bradley Landfill to serve the community’s solid waste needs upon the closure of the existing landfill operations. Therefore, Phase I of the Proposed Project would be consistent with this RCPG policy.</p>
<p><u>Air Quality Chapter Core Actions</u></p> <p>5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.</p>	<p>This policy is not directly applicable to Phase I of the Proposed Project as it relates to the development of programs to address air quality conditions in the region. Phase I of the Proposed Project would implement all feasible mitigation measures to minimize air emissions (see Section IV.D, Air Quality) which have been adopted by the SCAQMD and other agencies. Phase I of the Proposed Project would be consistent with this Air Quality Chapter action, to the degree applicable.</p>
<p>5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation and economic</p>	<p>This EIR addresses consistency with applicable regional and local plans and policies related to air quality, land use, and transportation. Phase I of the Proposed Project would be consistent with all applicable policies and would be consistent with this Air</p>

Policies and Guides	Characteristics of the Proposed Project
relationships to ensure consistency and minimize conflicts.	Quality Chapter action. Economic relationships are not relevant when comparing a specific project to adopted plans.
<p><u>Water Quality Chapter Recommendations and Policy Options</u></p> <p>11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.</p>	Landscaping around the perimeter of the landfill and adjacent to the facility's buildings and the final vegetative cover on the landfill would be irrigated to the extent feasible with reclaimed (grey) water. Therefore, Phase I of the Proposed Project would be consistent with this Water Quality Chapter recommendation.
<p><u>Goals and Objectives for Solid Waste Management</u></p> <p>1. Promote the following waste management practices in order of priority:</p> <ul style="list-style-type: none"> • Waste Prevention • Recycling and Composting • Safe Disposal or Transformation 	<p>Waste Prevention – This policy is only indirectly related to Phase I of the Proposed Project, as waste prevention is the responsibility of individual City and County agencies.</p> <p>Recycling/Composting - Under Phase I of the Proposed Project, green and wood waste operations on Bradley East would be increased from 1,260 tpd to 2,500 tpd. The existing MRF operations would also increase from 92 tpd to 99 tpd.</p> <p>Safe Disposal – The Bradley Landfill is a Class III Landfill which does not accept hazardous wastes. In order to prevent dangerous wastes from being disposed of at the Bradley Landfill, there are load checking procedures that have been implemented. The wastes permitted for disposal and the procedures utilized to prevent unauthorized wastes from being disposed of at the Bradley Landfill are described in Section 4.9, Hazardous Materials, of this EIR.</p> <p>Therefore, Phase I of the Proposed Project would be consistent with this Solid Waste Management objective.</p>
<p>2. Minimize unnecessary duplication of effort in solid waste programs carried out by local governments.</p>	This policy is only indirectly related to Phase I of the Proposed Project, as solid waste programs are the responsibility of City and County agencies. The Proposed Project implements the policies and programs that these agencies establish.
<p>3. Divert at least 25 percent of all waste from landfills by the year 1995, and divert at least 50 percent by the year 2000.</p>	This policy is only indirectly related to Phase I of the Proposed Project, as solid waste source reduction programs are the responsibility of City and County agencies. The Proposed Project helps to implement the source reduction programs that these agencies establish.
<p>4. Ensure that there is adequate, environmental safe disposal capacity for the remaining wastes.</p>	With implementation of Phase I of the Proposed Project, the Bradley Landfill would have the capacity available to continue operations until its' permits expire on April

Policies and Guides	Characteristics of the Proposed Project
	14, 2007. This would allow for the continued disposal of remaining wastes while the City explores other options for the disposal of municipal solid waste. Therefore, Phase I of the Proposed Project would be consistent with this Solid Waste Management objective.

Los Angeles Regional Water Quality Control Board Basin Plan

The Los Angeles Regional Water Quality Control Board (LARWQCB) Basin Plan has five specific ground water objectives, which deal primarily with acceptable concentrations of chemicals, minerals, and other substances in groundwater. Groundwater quality is monitored at the Bradley Landfill by 14 groundwater wells located both up-gradient and down-gradient of the landfill.⁶ The groundwater monitoring well network is maintained and modified as necessary to protect the underlying groundwater and to ensure compliance with applicable regulations. All modifications of these wells are done with the approval of the LARWQCB.

The groundwater elevation in each monitoring well is measured on a monthly basis pursuant to the existing WDRs and to ensure that there is adequate separation between the landfill base and the groundwater table as required by Title 27, Section 20204 of the California Code of Regulations. On a semiannual basis, samples from each of the monitoring wells are collected and analyzed, and the results are reported to the LARWQCB in accordance with the facility WDR and MRP No. 6434, dated November 1, 1996. The monitoring results have not indicated the presence of any leachate releases from the landfill to groundwater and no exceedances of the objectives identified in the Basin Plan have occurred.

However, in 1991, low levels of volatile organic compounds (VOCs) were detected in six ground water monitoring wells. This was identified as a limited problem linked to the landfill gas system and not a leachate release. A correction action program was submitted by the operator and approved by the LARWQCB in 1994. By June of 1994, three of the six monitoring wells tested clean and the levels of organic compounds in the other three wells had been reduced by 90% due to improvements in the gas collection system. General downward or stable trends have continued to the present day.

Los Angeles County Countywide Siting Element

Phase I of the Proposed Project would not conflict with any applicable policies of the Los Angeles County Countywide Siting Element and would implement a number of those policies as discussed below.

- The majority of land uses immediately adjacent to the existing Bradley Landfill and the proposed vertical expansion, construction activities associated with the new TS/MRF and expansion of the existing green and wood waste and MRF areas are compatible with the landfill. These uses are predominantly light industrial and commercial. The only exception is the two residences located approximately 75 and 225 feet, respectively, from the property boundary. However, these uses are located in an area which is zoned as M1 (Industrial) and are considered to be nonconforming

⁶ Wells 4915A, 4915B, 4915C, 4915D, 4915E, 4915G, and 4915M are up-gradient wells and Wells 4916D, 4916F, 4916G, 4916H, 4916J, and 4916L are down-gradient wells (see Figure 4.8-5, Location of Production Wells within 1 Mile of Bradley Landfill).

uses. Therefore, the proposed landfill expansion would be considered to be compatible with the surrounding land uses. (Policy 2.4.1-6)

- Under Phase I of the Proposed Project, a 4,000 tpd TS would be constructed. Construction of the TS would allow for the development of infrastructure which could support the shipping of solid waste to other facilities in Los Angeles County or to facilities located in other counties. (Policy 2.4.1-10)
- As part of Phase I, the existing MRF would be expanded to accommodate 99 tons of recyclables per day. This increase in recycling activity would reduce the amount of materials entering the landfill, extending the life of the existing landfill slightly. (Policy 2.4.2-1)
- Phase I of the Proposed Project would extend the height of the landfill to allow it to continue accepting waste for disposal until its permit expires in April 2007. During this time, a TS would be constructed which would be able to handle the trash the landfill currently receives and ship it to other facilities. This would allow for uninterrupted levels of solid waste service for the communities which the Bradley Landfill serves. (Policy 2.4.3-3)
- Individuals within three miles of the Bradley Landfill and Recycling Center were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. Copies of all responses received from the Notice of Preparation (NOP) are provided in Appendix B-1. Additionally, a copy of the transcript from the scoping meeting held on April 24, 2004 is provided in Appendix B-2. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 2.4.4-3)
- As of August 2005, the Bradley Landfill and Recycling Center is in compliance with all federal, State, and local environmental regulations with respect to solid waste disposal facilities. (Policy 2.4.4-5).
- During Phase I of the Proposed Project, the BLRC will maintain its green and wood waste recycling programs. In addition, the existing green and wood waste processing area on Bradley East would be expanded by 1,240 tpd to handle 2,500 tpd. (Policy 2.4.5-1)
- This policy requires the County to maintain and/or expand the Yard Waste Management Program. During Phase I, the existing green and wood waste processing area at Bradley Landfill would be expanded by 1,240 tpd to accommodate up to 2,500 tpd of green and wood waste. This increase in processing capacity would enable the County to maintain or expand their yard waste program, if desired. (Policy 2.4.5-2)

- The existing Bradley Landfill has a waste salvage/diversion operation which would be expanded during Phase I of the Proposed Project. These operations are conducted in compliance with all applicable rules and regulations and would continue to be operated accordingly. (Policy 2.4.7-1)
- The BLRC provides all required data, as specified in the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), to the County of Los Angeles. The Bradley Landfill would continue to meet the mandates of AB 939 during Phase I of the Proposed Project. (Policy 2.4.7-2).

Mitigation Measures: No mitigation measures are required.

Phase II – Transfer Station/Materials Recycling Facility

Impact 4.2-5: Operation of the new TS/MRF and existing green and wood waste facility would not generate any significant land use compatibility impacts due to the distance of sensitive receptors from the operations and procedures currently in place to reduce impacts. (Less Than Significant)

Phase II of the Proposed Project would involve the closure of the existing landfill operations. No additional solid waste would be accepted for landfilling activities. Activities associated with landfill closure would occur and include final grading, installation of final cover, planting of vegetation, and constructing surface water control structures. With completion of the landfill closure, a vegetated mound or hill would remain (see Section 4.6, Aesthetics, for simulations of future landfill conditions).

In addition to the closure of the landfill, Phase II includes the operation of the new TS/MRF and the expanded greenwaste area that were constructed under Phase I. These uses would not involve any new types of impacts that do not occur with the existing operational landfill. Procedures currently in place to reduce impacts to air quality, noise, geology and soils, hazards, etc. would continue to be utilized with Phase II of the Proposed Project. However, typical procedures for controlling odors at a landfill (e.g., daily cover) would not be appropriate for a TS due to different operational constraints. The TS proposed under the Proposed Project would be entirely enclosed and approximately 200 feet further away from the nearest sensitive receptors than the existing active landfill. A detailed discussion regarding potential odor impacts associated with the TS/MRF is provided in Section 4.4 and mitigation measures have been identified to reduce potential impacts. Therefore, land use impacts from Phase II of the Proposed Project are anticipated to be less than significant.

Mitigation Measures: No mitigation measures are required.

Impact 4.2-6: Phase II of the Proposed Project would be generally consistent with the following adopted plans and policies: City of Los Angeles General Plan, SCAG's Regional Comprehensive Plan and Guide, the LARWQCB Basin Plan, and the Los Angeles County Siting Element. (Less Than Significant)

Under Phase II of the Proposed Project, the TS/MRF constructed under Phase I would be operated, replacing the existing landfill operation. The portions of the landfill that have not undergone closure would encompass activities associated with closing the landfill (e.g., installation of final cover, planting of vegetation, constructing surface water control structures, and transition of the landfill to an end use).

Consistency of these activities with the plans and policies identified above is discussed below. Phase II activities would be consistent with both the General Plan and the RCPG.

City of Los Angeles General Plan

Phase II of the Proposed Project would not conflict with any of the applicable policies of the City of Los Angeles General Plan and would work to implement a number of those policies, as discussed below.

Framework Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Framework Element and would work to implement a number of those policies as discussed below.

- Phase II of the Proposed Project would result in the closure of the existing Bradley Landfill and the loss of landfill daily tonnage capacity. However, the new TS/MRF and expanded greenwaste facility would become operational. These facilities would allow for solid waste to be consolidated in one location before being shipped to other landfills outside of the Sun Valley area. This would allow for the BLRC to continue providing solid waste processing services, at a slightly reduced daily tonnage capacity, without operating an active landfill on the project site. (Policy 3.1.2)
- Section 5.4 of this EIR discusses the potential for disproportionate adverse impacts to groups of individuals based on their race and/or income level as a result of the implementation of Phase II of the Proposed Project. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 3.1.9)
- The project site is currently developed with an existing landfill. With implementation of Phase II of the Proposed Project, the existing landfill would be closed. Additionally, a new type of solid waste facility would be established on the project site – TS/MRF. These facilities would be constructed under Phase I and become operational under Phase II. Additionally, the Sun Valley – La Tuna Canyon Community Plan, a portion of the City of Los Angeles General Plan, identified a future recycling-type facility on the subject property as the “Sun Valley Recycling Park of Los Angeles”. (Policy 3.4.2 and 3.14.1)

- Phase II of the Proposed Project would be subject to the environmental conditions placed upon the existing landfill in their permits such as the Title V Air Quality permit, the Industrial Wastewater Discharge Permit, etc. In addition, mitigation measures are provided in this EIR to reduce impacts associated with air quality, noise, transportation/circulation, hazards, geology, and hydrology. These sections also address any potential cumulative impacts associated with implementation of Phase II of the Proposed Project. (Policy 7.2.14)
- Under Phase II of the Proposed Project, wastewater from the closed landfill would continue to be collected and treated as prescribed in the Industrial Wastewater Permit. Stormwater and irrigation runoff would be handled as described in Section 4.8, Hydrology. Additionally, all federal, State, and local laws and regulations would be followed with respect to landfills. The small amount of wastewater anticipated to be generated from the use of the TS/MRF will be treated in a clarifier and routed to the sewer system pursuant to an Industrial Wastewater Permit. (Policy 9.2.1)
- With implementation of Phase II of the Proposed Project, the existing landfill would be closed. Wastewater (leachate) generated by the landfill would continue to be collected and disposed of in accordance with the existing Industrial Wastewater Permit. Stormwater and irrigation runoff from the closed landfill would be collected and disposed of in accordance with all applicable laws and regulations. Additionally, hazardous waste would not be accepted for disposal at the TS/MRF. The procedures in place to prevent the acceptance of hazardous waste at the landfill under Phase I would continue to be implemented at the TS/MRF. Therefore, the potential for hazardous waste to contaminate the wastewater, stormwater, and irrigation runoff from the project site would be minimal. (Policy 9.3.1)
- Water conservation measures would be utilized for the irrigation of the final vegetative cover installed during the closure of the landfill. (Policy 9.3.2)
- The Bradley Landfill would continue to use water conservation practices in its day-to-day operations under Phase II of the Proposed Project. The final vegetative cover installed during the closure of the landfill would be drought resistant and would require less water than other plant species. Additionally, any watering of dirt roads utilized in the operation of the TS/MRF would be conducted as required. Water conservation would be employed in these activities to the maximum extent feasible. (Policy 9.9.7)
- Under Phase II of the Proposed Project, current refuse collection trucks would continue to be converted to or replaced by low emission alternatives. Landscaping and dirt roads would be watered with reclaimed water, as feasible. (Policy 9.29.2)
- Under Phase II of the Proposed Project, current refuse collection trucks would continue to be converted to or replaced with low emission alternatives. (Policies 9.29.3 and 9.29.7)

Housing Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Housing Element and would work to implement a number of those policies as discussed below.

- The nearest legally conforming residences are located approximately 350 feet from the boundary of the landfill property. Table 4.2-1 provides a summary of the distances from various sensitive receptors to different aspects of the Proposed Project. Under Phase II of the Proposed Project, the existing landfill would be closed and a TS/MRF would be operated. Measures are in place and additional mitigation would be required which would protect the nearby residences from potential impacts. These existing measures and mitigation measures for each issue area are described in the respective sections of this document. (Policy 2.3.5)
- Section 5.4 of this EIR discusses potential adverse impacts to groups of individuals based on their race and/or income level as a result of the implementation of Phase II of the Proposed Project. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 3.1.7)

Noise Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Noise Element and would work to implement a number of those policies as discussed below.

- Under Phase II of the Proposed Project, noise impacts would be generated by the trash trucks entering/exiting the project site, the operation of the flares, generators, and any construction equipment required to establish the final contours of the landfill. Mitigation measures have been identified in Section 4.5, Noise, for any noise impacts which may be potentially significant. (Policy 2.2)

Air Quality Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Air Quality Element and would work to implement a number of those policies as discussed below.

- Under Phase II of the Proposed Project, the existing Bradley Landfill would be closed. Construction-type activities associated with this closure include installation of final cover; planting of vegetation on all slopes; and constructing surface water control features. These activities have the potential to generate particulate emissions. Mitigation measures have been

identified in Section 4.4, Air Quality, to reduce the amount of emissions generated during these activities. (Policy 1.3.1)

- Vehicles/trucks driving on unpaved roads during the landfill closure activities and during operation of the TS/MRF and the greenwaste facility have the potential to generate particulate emissions. Measures to reduce the amount of particulate emissions, such as regular water of dirt roads, have been identified in Section 4.4, Air Quality. (Policy 1.3.2)
- Under Phase II of the Proposed Project, current refuse collection trucks would continue to be converted to or replaced by low emission alternatives. This would reduce the amount of energy consumed and would shift the type of fuel consumed to a less polluting and renewable energy source. (Policy 5.1.2)
- Under Phase II of the Proposed Project, the new MRF and the expanded greenwaste facility would be fully operational and the landfill would be closed. All loads entering the new MRF would be sorted and the residual trash sent to other area landfills. The new MRF would accept up to 1,000 tpd and the green and wood waste area would accept 2,500 tons tpd. (Policy 5.1.4)
- During Phase II of the Proposed Project, the current refuse collection trucks would continue to be converted to or replaced by low emission alternatives. Therefore, emissions generated by the operation of the trash trucks would be reduced during Phase II. (Policy 5.2.1)

Transportation Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Transportation Element and would work to implement a number of those policies as discussed below.

- While telecommuting and teleconferencing are not viable options for employees of the BLRC due to the nature of the work performed, somewhat flexible schedules are utilized as the hours of operation necessitate the use of shifts. During Phase II of the Proposed Project, some type of activities would be occurring on the project site; 24 hours, six days a week (see Table 3-10 for detailed description of operations). Since activities would be occurring throughout a 24-hour time period, employee arrival and departures would be staggered throughout the day reducing the number of employee trips during peak traffic hours. (Policy 2.7)
- A traffic analysis was completed in order to address potential impacts associated with the implementation of Phase II of the Proposed Project. The recommendations of the traffic analysis have been included in this EIR as mitigation measures in order to reduce potentially significant traffic impacts. Further discussion of potential traffic impacts can be found in Section 4.3, Transportation/Circulation. A copy of the traffic report can be found in Appendix E. (Policies 2.8 and 3.1)

- As identified for Phase I in the traffic report, the applicant would be required to contribute towards funding the City of Los Angeles' expanded signal system improvement (ATSAC/ATCS). Funding of this system during Phase I would reduce the potential traffic impacts associated with Phase II of the Proposed Project. (Policy 2.35)
- During Phase II of the Proposed Project, current refuse collection trucks would continue to be converted to or replaced by low emission alternatives. These trucks would help meet mandates for zero emissions vehicle and alternative fuel vehicles. (Policies 2.36 and 2.37)
- The criteria of significance used in this EIR are the standard ones utilized by the City of Los Angeles to determine traffic impacts. While traffic impacts associated with Phase II of the Proposed Project were identified, none of these impacts would remain significant upon incorporation of the identified mitigation measures. Additionally, none of the impacted intersections are located within residential neighborhoods. (Policy 3.2)
- As part of the traffic analysis prepared for the Proposed Project, the Proposed Project's consistency with the CMP was analyzed. The project's impacts on the freeway segments utilized by the trash trucks were analyzed and it was determined that the project would not impact any CMP roadways/freeways. A detailed description of the CMP analysis performed for Phase II of the Proposed Project can be found in Section 4.3, Transportation/Circulation. (Policy 3.3)
- Mitigation measures were identified which reduce traffic impacts at the four specified intersections. In some instances, the resulting conditions at these intersections, after implementation of the required mitigation measures, would be better than without the Proposed Project. (Policy 3.11)
- Section 5.4 of this EIR discusses the potential for disproportionate adverse impacts to groups of individuals based on their race and/or income level. Individuals living within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. The Notice of Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 7.3)

Conservation Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Conservation Element and would work to implement a number of those policies as discussed below.

- The Bradley Landfill was formerly a sand and gravel mine. Upon depletion of these resources, it was converted into the existing landfill. Under Phase II of the Proposed Project, the landfill would be closed (see list of closure activities in Section 3.0, Project Description) and the new

TS/MRF and expanded greenwaste area would be operated. There are no biological or cultural resources located on the project site. There are also no ecologically important areas immediately adjacent to the landfill. Groundwater under the landfill is protected by following the conditions listed in the landfill's permits and all applicable State, federal and local laws and regulations with respect to landfills. (Policy 18.1)

- Under Phase II of the Proposed Project, current refuse collection trucks would continue to be converted to or replaced by low emission alternatives. (Policy 19.1)

Safety Element

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Safety Element and would work to implement a number of those policies as discussed below.

- Under Phase II of the Proposed Project the existing landfill would be closed and the new TS/MRF would become operational. The new TS/MRF would not accept hazardous materials and the same procedures in place for the existing landfill to prevent the acceptance of hazardous materials would be utilized to prevent the acceptance of hazardous materials at the new TS/MRF. (Policy 1.1.4)

Land Use Element (Community Plan for the Sun Valley – La Tuna Canyon Community)

Phase II of the Proposed Project would not conflict with any applicable policies of the City of Los Angeles Land Use Element and would work to implement a number of those policies as discussed below.

- The Bradley Landfill has existing procedures to reduce impacts to nearby receptors from traffic, noise, air quality, hazards, etc. These procedures are explained under each issue area. Additionally, mitigation measures have been identified in this EIR to further reduce potential impacts in these issue areas. (Policy 3-1.3)
- The project site was formerly used as a sand and gravel mine before its conversion to a solid waste landfill. Under Phase II of the Proposed Project, the landfill would be closed and a new TS/MRF would be operated on the project site. The operation of these facilities does not prevent sand and gravel resources from being mined in the surrounding areas. (Policy 3-1.4)
- Phase II of the Proposed Project would involve the closure of the existing landfill. As part of this closure process, vegetation would be planted on the final slopes to prevent erosion and to present an attractive looking hillside. This vegetation would not be tall and obtrusive and therefore would not block visibility on the project site. (Policy 8-2.1)
- Adequate lighting would be provided at the new TS/MRF and other working areas on the project site. This lighting would be provided for the safety of the workers and would not intrude on the neighboring uses. (Policy 8-2.2)

- It was determined through the preparation of an Initial Study (see Appendix A-3) that Phase II of the Proposed Project would not produce a significant impact on fire protection services. Additionally, as part of the review process for the Draft EIR, the Fire Department was sent a copy of the Draft EIR for their review and comment. (Policy 9-1.1)

Regional Comprehensive Plan and Guide

The Regional Comprehensive Plan and Guide (RCPG) includes several policies which could be potentially applicable to Phase II (TS/MRF) of the Proposed Project. These were identified in a letter from the Southern California Association of Governments dated May 7, 2003.⁷ Phase II of the Proposed Project's consistency with identified policies is discussed in Table 4.2.3.

⁷ See Appendix B-1

**Table 4.2-3
Comparison of Phase II (TS/MRF) Project Characteristics to RCPG Policies**

Policies and Guides	Characteristics of the Proposed Project
<p><u>Consistency with Regional Comprehensive Plan and Guide Policies</u> 3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region’s growth policies.</p>	<p>Phase II of the Proposed Project is anticipated to add approximately 87 permanent employees to the local economy, in addition to those already added during Phase I. Potential impacts to utilities, with the exception of wastewater, were determined to be less than significant during the preparation of the Initial Study for the Proposed Project (see Appendix A-3). Impacts to wastewater and transportation systems have been addressed in Sections 4.10 and 4.3 of this document, respectively. Therefore, Phase II of the Proposed Project would be consistent with this RCPG policy.</p>
<p><u>Consistency with Growth Management Chapter Policies Related to the RCPG Goal to Improve the Regional Quality of Life</u> 3.18 Encourage planned development in locations least likely to cause environmental impact.</p>	<p>The project site is located in an urbanized area and currently contains the existing BLRC. Phase II of the Proposed Project would close the existing landfill operations and operation of the new TS/MRF would begin. No new types of environmental impacts are anticipated as a result of the landfill closure or operation of the new TS/MRF. Measures that are currently in place to prevent environmental impacts would continue to be implemented. However, typical procedures for controlling odors at a landfill (e.g., daily cover) would not be appropriate for a transfer station due to different operational constraints. The TS proposed under the Proposed Project would be entirely enclosed and approximately 200 feet further away from the nearest sensitive receptors than the existing active landfill. A detailed discussion regarding potential odor impacts associated with the new TS/MRF is provided in Section 4.4, Air Quality, and mitigation measures have been identified to reduce potential impacts.</p>
<p>3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.</p>	<p>There are no known wetlands, woodlands, or land containing unique and endangered plants and animals. The landfill was formerly a sand and gravel mine, whose resources had been exhausted. Therefore, the project site is not located on an area which could be used for production lands. The project site is not located on an area which is specifically used for groundwater recharge. A large groundwater recharge area is located approximately 0.5 miles to the northwest of the project site and is identified as the Hansen Spreading Grounds. Additionally, a liner is in place which prevents groundwater recharge in the area of the landfill footprint. Therefore, Phase II of the Proposed Project would be consistent with this RCPG policy.</p>
<p>3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>The project site is located in an urbanized and extremely disturbed area. The site was formerly used as a sand and gravel mine and then was converted into the existing landfill. There are no recorded cultural resources or archaeological sites located on</p>

	<p>the project site and none are expected to be discovered. No impacts to cultural or archaeological resources are anticipated as a result of implementing Phase II of the Proposed Project. Therefore, this Phase of the Proposed Project would be consistent with this RCPG policy.</p>
<p>3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood and seismic hazards.</p>	<p>The project site is not located in an area with high fire, flood or seismic hazards. The project site does contain slopes due to the presence of the landfill. However, the steepness of these slopes are regulated by requirements placed on the landfill through the existing permits. With closure of the landfill, the final contours of the landfill will be graded in accordance with these requirements and conditions and no impacts associated with steep slopes are anticipated. A detailed discussion of the final grading of the landfill can be found in Section 3.0, Project Description. Therefore, Phase II of the Proposed Project would be consistent with this RCPG policy.</p>
<p>3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.</p>	<p>Implementation of Phase II of the Proposed Project would include mitigation measures to address any potentially significant impacts with respect to issues such as noise, air quality, and transportation/circulation. The closure of the existing landfill and the operation of the new TS/MRF would conform to all seismic safety requirements and would not conflict with any emergency response plans. No mitigation measures are required for biological resources as no impacts would occur to those resources as a result of implementing Phase II of the Proposed Project. Therefore, Phase II of the Proposed Project would be consistent with this RCPG policy.</p>
<p><u>Consistency with Growth Management Chapter Policies Related to the RCPG Goal to Provide Social, Political, and Cultural Equity</u></p>	
<p>3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.</p>	<p>Implementation of Phase II of the Proposed Project would result in the closure of the existing landfill and the operation of the new TS/MRF. With operation of the new TS/MRF, the Bradley Landfill would be able to continue to serve the solid waste needs of the City of Los Angeles. Therefore, Phase II of the Proposed Project would be consistent with this RCPG policy.</p>
<p><u>Air Quality Chapter Core Actions</u></p>	
<p>5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based projects, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.</p>	<p>This policy is not directly applicable to Phase II of the Proposed Project as it relates to the development of programs to address air quality conditions in the region. Phase II of the Proposed Project would implement all feasible mitigation measures to minimize air emissions (Section 4.4, Air Quality) which have been adopted by the SCAQMD and other agencies. Phase II of the Proposed Project would be consistent with this Air Quality Chapter action, to the degree applicable.</p>
<p>5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic</p>	<p>This EIR addresses consistency with applicable regional and local plans and policies related to air quality, land use, and transportation. Phase II of the Proposed Project would be consistent with all applicable policies and would be consistent with this Air</p>

<p>relationships to ensure consistency and minimize conflicts.</p>	<p>Quality Chapter action. Economic relationships are not relevant when comparing specific projects to adopted plans.</p>
<p>Water Quality Chapter Recommendations and Policy Options 11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.</p>	<p>Landscaping around the perimeter of the landfill and adjacent to the facility's buildings and the final vegetative cover on the landfill would be irrigated to the extent feasible with reclaimed water. Therefore, Phase II of the Proposed Project would be consistent with this Water Quality Chapter policy.</p>
<p>Goals and Objectives for Solid Waste Management 1. Promote the following waste management practices in order of priority:</p> <ul style="list-style-type: none"> • Waste Prevention • Recycling and Composting • Safe Disposal or Transformation 	<p>Waste Prevention – This policy is only indirectly related to Phase II of the Proposed Project, as waste prevention is the responsibility of individual City and County agencies. Phase II of the Proposed Project would implement the policies and programs created by these agencies to the extent feasible.</p> <p>Recycling/Composting – Under Phase II of the Proposed Project, green and wood waste operations on Bradley East would continue to accept up to 2,500 tpd and the new MRF would accept and process up to 1,000 tpd of recyclables.</p> <p>Safe Disposal – The Bradley Landfill would be closed under Phase II and would not accept any hazardous wastes. The operation of the new TS/MRF would also not accept hazardous waste and would ensure that none is accepted through the same procedures that the existing landfill currently utilizes. The wastes that would be accepted at the TS are described in Section 4.9, Hazardous Materials, of this EIR.</p> <p>Therefore, Phase II of the Proposed Project would be consistent, to the extent possible, with this Solid Waste Management objective.</p>
<p>2. Minimize unnecessary duplication of effort in solid waste programs carried out by local governments.</p>	<p>This policy is only indirectly related to Phase II of the Proposed Project, as solid waste programs are the responsibility of City and County agencies. The Proposed Project implements the policies and programs that these agencies establish.</p>
<p>3. Divert at least 25 percent of all waste from landfills by the year 1995 and divert at least 50 percent by the year 2000.</p>	<p>This policy is only indirectly related to Phase II of the Proposed Project, as solid waste source reduction programs are the responsibility of City and County agencies. The Proposed Project will help to encourage source separation of recyclable materials and thereby aid in source reduction programs that these agencies establish.</p>
<p>4. Ensure that there is adequate, environmental safe disposal capacity for the remaining wastes.</p>	<p>With implementation of Phase II of the Proposed Project, the existing Bradley Landfill would be closed and would no longer accept solid waste for disposal. However, a new TS/MRF would be operated on the project site. This would allow solid waste from the City of Los Angeles to be consolidated in one location and then shipped to other area landfills. Therefore, Phase II would be consistent with this</p>

	Solid Waste Management objective.
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Los Angeles Regional Water Quality Control Board Basin Plan

Under Phase II of the Proposed Project, the landfill would be closed and the operation of the new TS/MRF would begin. No solid waste/refuse would be accepted at Bradley for disposal. Since no additional refuse would be buried in the landfill, it is unlikely that contamination of the groundwater, in excess of the objectives outlined in the Basin Plan, would occur especially since none has occurred to date. Ground water samples would continue to be drawn on a semiannual basis for testing to ensure that no contamination occurs. All activities proposed for Phase II would be conducted in accordance with all applicable rules and regulations and in accordance with all permits. Any changes to the groundwater monitoring that might be required in the future would be approved by the LARWQCB. Therefore, Phase II of the Proposed Project would be in compliance with the LARWQCB Basin Plan.

Los Angeles County Countywide Siting Element

Phase II of the Proposed Project would not conflict with any applicable policies of the Los Angeles County Countywide Siting Element and would implement a number of those policies as discussed below.

- Similar to Phase I, a majority of the land uses adjacent to the project site would be compatible with the activities proposed under Phase II of the Proposed Project. These activities include those associated with landfill closure operations and operation of the new TS/MRF. The only incompatible land uses adjacent to the landfill are two single family residences located approximately 75 feet and 225 feet from the property boundary. However, these uses are located in an area that is zoned as M1 (Industrial) and are considered non-conforming uses. In addition, the closest conforming residence is located a minimum of 700 feet away from the primary activities (e.g., TS/MRF) proposed for Phase II. Therefore, Phase II of the Proposed Project would be considered to be predominantly compatible with the surrounding land uses. (Policy 2.4.1-6)
- With implementation of Phase II of the Proposed Project, the 4,000 tpd TS would be fully operational. This would facilitate the shipment of solid waste to other facilities in the region (either within the county or to other counties, e.g., Orange County). (Policy 2.4.1-10)
- Under Phase II of the Proposed Project, the new TS/MRF would be fully operational. This would allow the consolidation of solid waste for shipment to other facilities. Converting the landfill to a TS would allow larger quantities of solid waste to be shipped elsewhere at one time, keeping the cost of disposal at a reasonable level. (Policies 2.4.2-1 and 2.4.3-3)
- Individuals within three miles of the Bradley Landfill were notified by mail of the Proposed Project and a Community Advisory Group was formed to provide input to Waste Management regarding the concerns and opinions of the community. Copies of all responses received from the Notice of Preparation are provided in Appendix B-1. Additionally, a copy of the transcript from the scoping meeting held on April 24, 2003 is provided in Appendix B-2. The Notice of

Availability of the Draft EIR to the public for comment was provided in accordance with Section 15087 of the State CEQA Guidelines. (Policy 2.4.4-3)

- As of August 2005, the BLRC is in compliance with all federal, State, and local environmental regulations with respect to solid waste disposal facilities. No change in this condition is anticipated with implementation of Phase II of the Proposed Project. (Policy 2.4.4-5)
- During Phase II of the Proposed Project, the MRF and the green and wood waste operations would continue to operate. The new TS/MRF constructed during Phase I would become operational, increasing the amount of solid waste that could be sorted and either recycled or shipped to other facilities. Additionally, the expansion of the green and wood waste operations would have been completed and would be operating at their increased levels of 2,500 tpd. (Policy 2.4.5-1)
- This policy requires the County to maintain and/or expand the Yard Waste Management Program. The expanded green and wood waste processing area on Bradley East would continue to operate during Phase II of the Proposed Project. This would enable the County to maintain or expand their yard waste program, if desired. (Policy 2.4.5-2)
- Under Phase II of the Proposed Project, the newly constructed TS/MRF would become fully operational. This operation would be conducted in compliance with all applicable rules and regulations. (Policy 2.4.7-1)
- The BLRC provides all required data, as specified in the California Integrated Waste Management Act of 1989 (AB 939, as amended), to the County of Los Angeles. During Phase II, the existing landfill would be closed and trash would no longer be accepted for disposal. However, the new TS/MRF and expanded green and wood waste operations would continue to operate. All required data concerning these operations would be supplied to the County of Los Angeles, thereby meeting the mandates of AB 939. (Policy 2.4.7-2)

CUMULATIVE IMPACTS

Cumulative land use impacts could occur if other related projects in the vicinity of the project site would result in land use incompatibility impacts in conjunction with the impacts of the Proposed Project. The Proposed Project would be compatible with the existing land uses and would implement important local and regional goals and policies for the City of Los Angeles, which would assist the City in achieving short- and long-term planning goals and objectives. Because the Proposed Project is compatible with the surrounding land uses and is consistent with existing planning goals and objectives, it would not contribute towards any cumulative impact in the area. Therefore, land use impacts would thus not be cumulatively considerable.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Any potential land use impacts would be less than significant.