

**Responses to November 27, 2002 Notice of Preparation**



Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

Notice of Preparation

December 4, 2002

RECEIVED  
CITY OF LOS ANGELES

DEC 09 2002

ENVIRONMENTAL  
UNIT

To: Reviewing Agencies

Re: Bradley Landfill and Recycling Center Transition Master Plan  
SCH# 2002121027

Attached for your review and comment is the Notice of Preparation (NOP) for the Bradley Landfill and Recycling Center Transition Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Jimmy Liao**  
**Los Angeles City Planning Department**  
**200 N. Spring Street**  
**Suite 763**  
**Los Angeles, CA 90012**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Becky Frank  
Project Analyst, State Clearinghouse

Attachments  
cc: Lead Agency

Document Details Report  
State Clearinghouse Data Base

**SCH#** 2002121027  
**Project Title** Bradley Landfill and Recycling Center Transition Master Plan  
**Lead Agency** Los Angeles City Planning Department

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**Type** NOP Notice of Preparation  
**Description** The proposed project consists of two phases. The first phase is a transitional 43 foot vertical landfill expansion that will provide additional short term disposal capacity within the boundaries of the existing landfill to allow the landfill to operate until the established closure date of April 14, 2007. The second phase will consist of a 6,000 tons per day transfer station and 1,000 tons per day Material Recovery Facility that will be constructed adjacent to the existing landfill. The purpose of this plan is to provide for an orderly transition of Bradley Landfill and Recycling Center from an active landfill to a transfer station/Materials Recovery Facility.

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**Lead Agency Contact**

**Name** Jimmy Liao  
**Agency** Los Angeles City Planning Department  
**Phone** 213/978 1331 **Fax**  
**email**  
**Address** 200 N. Spring Street  
Suite 763  
**City** Los Angeles **State** CA **Zip** 90012

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**Project Location**

**County** Los Angeles  
**City**  
**Region**  
**Cross Streets** Glenoaks Blvd., Lankershim Blvd., Bradley Ave., Peoria Street

**Parcel No.**  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** 5  
**Airports**  
**Railways** Metrolink  
**Waterways**  
**Schools**  
**Land Use** M3-1-G and M2-1-G

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**Project Issues** Aesthetic/Visual; Air Quality; Forest Land/Fire Hazard; Water Quality; Landuse; Noise; Traffic/Circulation

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**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Department of Fish and Game, Region 5; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, District 7; Caltrans, District 1; Integrated Waste Management Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4; California Highway Patrol

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**Date Received** 12/04/2002 **Start of Review** 12/04/2002 **End of Review** 01/02/2003

**NOP Distribution List**

County: Los Angeles

SCH#

2002121027

Resources Agency

Resources Agency  
Nadell Gayou

Dept. of Boating & Waterways  
Suzi Beizler

California Coastal Commission  
Elizabeth A. Fuchs

Dept. of Conservation  
Roseanne Taylor

Dept. of Forestry & Fire Protection  
Allen Robertson

Office of Historic Preservation  
Hans Kreutzberg

Dept. of Parks & Recreation  
B. Noah Tilghman  
Environmental Stewardship Section

Reclamation Board  
Pam Bruner

S.F. Bay Conservation & Dev't Comm.  
Steve McAdam

Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Health & Welfare

Health & Welfare  
Wayne Hubbard  
Dept. of Health/Drinking Water

Food & Agriculture

Food & Agriculture  
Steve Shaffer  
Dept. of Food and Agriculture

Fish and Game

Dept. of Fish & Game  
Scott Flint  
Environmental Services Division

Dept. of Fish & Game 1  
Donald Koch  
Region 1

Dept. of Fish & Game 2  
Banky Curtis  
Region 2

Dept. of Fish & Game 3  
Robert Floerke  
Region 3

Dept. of Fish & Game 4  
William Laudermilk  
Region 4

Dept. of Fish & Game 5  
Don Chadwick  
Region 5, Habitat Conservation Program

Dept. of Fish & Game 6  
Gabrina Gatchel  
Region 6, Habitat Conservation Program

Dept. of Fish & Game 6 I/M  
Tammy Allen  
Region 6, Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Game M  
Tom Napoli  
Marine Region

Independent Commissions

California Energy Commission  
Environmental Office

Native American Heritage Comm.  
Debbie Treadway

Public Utilities Commission  
Ken Lewis

State Lands Commission  
Betty Silva

Governor's Office of Planning & Research  
State Clearinghouse Planner

Colorado River Board  
Gerald R. Zimmerman

Tahoe Regional Planning Agency (TRPA)  
Lyn Barnett

Office of Emergency Services  
John Rowden, Manager

Delta Protection Commission  
Debbie Eddy

Santa Monica Mountains Conservancy  
Paul Edelman

Dept. of Transportation

Dept. of Transportation 1  
Mike Eagan  
District 1

Dept. of Transportation 2  
Don Anderson  
District 2

Dept. of Transportation 3  
Jeff Pulverman  
District 3

Dept. of Transportation 4  
Tim Sable  
District 4

Dept. of Transportation 5  
David Murray  
District 5

Dept. of Transportation 6  
Marc Birnbaum  
District 6

Dept. of Transportation 7  
Stephen J. Buswell  
District 7

Dept. of Transportation 8  
Linda Grimes,  
District 8

Dept. of Transportation 9  
Katy Walton  
District 9

Dept. of Transportation 10  
Tom Durmas  
District 10

Dept. of Transportation 11  
Bill Figge  
District 11

Dept. of Transportation 12  
Bob Joseph  
District 12

Business, Trans & Housing

Housing & Community Development  
Cathy Creswell  
Housing Policy Division

Caltrans - Division of Aeronautics  
Sandy Hesnard

California Highway Patrol  
Lt. Julie Page  
Office of Special Projects

Dept. of Transportation  
Ron Helgeson  
Caltrans - Planning

Dept. of General Services  
Robert Sleppy  
Environmental Services Section

Air Resources Board  
Airport Projects  
Jim Lerner

Transportation Projects  
Kurt Karperos

Industrial Projects  
Mike Tollstrup

California Integrated Waste Management Board  
Sue O'Leary

State Water Resources Control Board  
Diane Edwards  
Division of Clean Water Programs

State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

State Water Resources Control Board  
Mike Falkenstein  
Division of Water Rights

Dept. of Toxic Substances Control  
CEQA Tracking Center

Regional Water Quality Control Board (RWQCB)

RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

RWQCB 3  
Central Coast Region (3)

RWQCB 4  
Jonathan Bishop  
Los Angeles Region (4)

RWQCB 5S  
Central Valley Region (5)

RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

RWQCB 6  
Lahontan Region (6)

RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

RWQCB 7  
Colorado River Basin Region (7)

RWQCB 8  
Santa Ana Region (8)

RWQCB 9  
San Diego Region (9)





# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
Carlsbad Fish and Wildlife Office  
6010 Hidden Valley Road  
Carlsbad, California 92009



In Reply Refer To:  
FWS-LA-3257.1

RECEIVED  
CITY OF LOS ANGELES

DEC 5 2002

DEC 11 2002

ENVIRONMENTAL  
UNIT

Jimmy C. Liao  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Suite 763  
Los Angeles, California 90012

Re: Notice of Preparation of a Draft Environmental Impact Report for Bradley Landfill and Recycling Center Transition Master Plan, City of Sun Valley, Los Angeles County, California

Dear Mr. Liao:

We have reviewed the above referenced Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) received by our office on December 2, 2002. The project proposes to develop a master plan for the Bradley Landfill located in Sun Valley, California. The proposed plan consists of two phases. The first phase is a transitional 43-foot vertical landfill expansion (from 1,010 to 1,053 feet above mean sea level) that will provide additional short-term disposal capacity within the boundaries of the existing landfill to allow the landfill to operate until the established closure date of April 14, 2007. The second phase will consist of a 6,000 tons per day transfer station and 1,000 tons per day material recovery facility that will be constructed adjacent to the existing landfill. The purpose of this plan is to provide for an orderly transition of Bradley Landfill and Recycling Center from an active landfill to a transfer station/material recovery facility. The project site is 79 acres (total landfill site is 209 acres).

We offer the following comments and recommendations regarding project-associated biological impacts based on our review of the NOP and our knowledge of declining habitat types and species within Los Angeles County. We provide these comments in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, we administer the Endangered Species Act (Act) of 1973, as amended. We also provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act.

To facilitate the evaluation of the proposed project from the standpoint of fish and wildlife protection, we request that the Draft EIR contain the following specific information:

1. A description of the environment in the vicinity of the project from both a local and regional perspective, including an aerial photograph of the area with the project site outlined.
2. A complete discussion of the purpose and need for the project and each of its alternatives.
3. A complete description of the proposed project, including the limits of development, grading, and fuel modification zones.
4. Quantitative and qualitative assessments of the biological resources and habitat types that will be impacted by the proposed project and its alternatives. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife associated habitats, particularly growth-accommodating effects of the project (e.g., increased population, increased development, increased traffic). All facets of the project (e.g., construction, implementation, operation, and maintenance) should be included in this assessment. Proposed developments in the surrounding area should be addressed in the analysis of cumulative impacts.

This assessment should include a list of Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species that are on or near the project site, including a detailed discussion of these species and information pertaining to their local status and distribution. We are particularly interested in any and all information and data pertaining to potential impacts to populations of federally listed species.

The analysis of impacts to biological resources and habitat types should include detailed maps and tables summarizing specific acreages and locations of all habitat types, as well as the number and distribution of all Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species, on or near the project site that may be affected by the proposed project or project alternatives.

5. A detailed discussion of measures to be taken to avoid, minimize, and offset impacts to biological resources.
6. A detailed analysis of impacts of the proposed project on the movement of wildlife and measures proposed to avoid, minimize, and offset impacts to wildlife movement.
7. An assessment of potential impacts to wetlands and jurisdictional waters of the United States. Section 404 of the Clean Water Act prohibits the unauthorized discharge of dredged or fill material into such waters, including wetlands. This section also provides that the U.S. Army Corps of Engineers (Corps) may issue permits for discharges of dredged or fill material into jurisdictional waters and wetlands. Potential areas of Corps jurisdiction should be evaluated and wetlands should be delineated using the methodology set forth in the Corps' Wetland Delineation Manual (Environmental Laboratory 1987). The Draft EIR should disclose all impacts to jurisdictional waters and wetlands, and

proposed measures to be taken to avoid and minimize impacts, and mitigate unavoidable impacts.

We appreciate the opportunity to comment on the referenced NOP for potential impacts on sensitive and endangered species, wildlife and wetlands. Should you have any questions pertaining to these comments, please contact Kerri Davis of my staff at (760) 431-9440.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen A. Evans" with a stylized flourish below it.

Karen A. Evans  
Assistant Field Supervisor

cc: Brad Henderson CDFG

**COMMUNITIES FOR A  
BETTER  
ENVIRONMENT**

*5610 Pacific Blvd., Suite 203, Huntington Park, CA 90025 \* (323) 826-9771 Fax: 323-588-7079*

**LEGAL DEPARTMENT**  
**FACSIMILE TRANSMISSION FORM**

**DATE:** December 11, 2002

**TO:** City of Los Angeles, Attn: Jimmy Liao  
**FAX:** 213-978-1343

**Cc:** Ruth Galanter (c/o Pete Brown)  
**FAX:** 818-756-9512

**Cc:** Liseth Romero-Martinez, Pacoima Beautiful  
**Fax:** 818-834-5186

**FROM:** Scott Kuhn, CBE Staff Attorney

**Number of pages (including cover):** 2

**COMMENTS:** CBE Comment on Bradley Landfill EIR

This facsimile contains confidential information that may also be privileged. Unless you are the addressee named above, or are authorized to receive the facsimile for the addressee, you may not copy, use, or distribute it. If you have received this facsimile in error, please advise Communities for a Better Environment immediately at the phone number listed above and return the facsimile to the above address by U.S. mail.

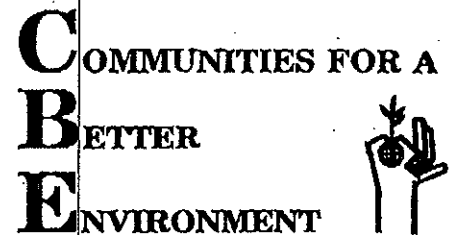
**IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION,  
PLEASE CONTACT US AT THE NUMBER ABOVE.**

***In Northern California: 1611 Telegraph Ave, Suite 450, Oakland, CA 94612, Tel: 510-302-0430; Fax: 510-302-0438***

VIA FAX (213-978-1343) and U.S. MAIL

December 12, 2002

City of Los Angeles Department of City Planning  
Attn: Jimmy Liao, Project Coordinator  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012



**RE: CBE Comments on EIR for Bradley Landfill and Recycling Center Transition EIR**

Dear City of Los Angeles and Jimmy Liao:

Communities for a Better Environment ("CBE") hereby comments on the proposed Bradley Landfill and Recycling Center Transition Master Plan project ("Project") located at 9227 Tujunga Ave, Sun Valley, Project ENV-2001-3267-EIR. CBE looks forward to a meaningful EIR process that provides for public participation and a full analysis of the Project, alternatives, and mitigations.

CBE has not had an adequate time to prepare comments for the public hearing on December 12, 2002. CBE will be studying the initial study and may submit further comments in the near future.

**Request for Public Notice and to be Added to Interested Persons Mailing list**

Pursuant to CEQA § 21092(b)(3), and all other applicable sections of state law, CBE requests that you please mail any and all public notices or information concerning the proposed Project or any other permitting or regulatory actions related to the Bradley Landfill to CBE at the following address:

Communities for a Better Environment  
Attn: Scott Kuhn  
5610 Pacific Blvd., Suite 203  
Huntington Park, CA 90255  
Fax: 323-588-7079

**CBE requests a copy of the initial study for the project. Please consider this a public records act (Gov. Code §6550) request. Please send the documents to the above address.**

Thank you for your attention to this matter. If you have any questions, please call 323-826-9771.

Sincerely,

Scott Kuhn, CBE Staff Attorney  
Carlos Porras, CBE Executive Director

Cc: Mayor James Hahn  
Councilperson Ruth Galanter  
Paçoima Beautiful

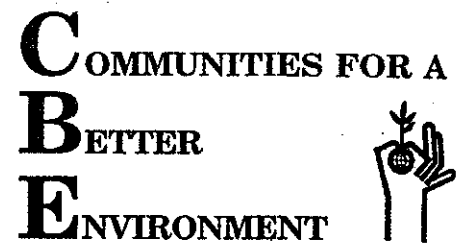
5610 Pacific Blvd., Suite 203 • Huntington Park, CA. 90255 • (323) 826-9771

In Northern California: 1611 Telegraph Avenue, Suite 450 • Oakland, CA 94612 • (510) 302-0430

VIA FAX (213-978-1343) and U.S. MAIL

December 12, 2002

City of Los Angeles Department of City Planning  
Attn: Jimmy Liao, Project Coordinator  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012



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5610 Pacific Blvd., Suite 203  
Huntington Park, CA 90255  
Fax: 323-588-7079

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Sincerely,

Scott Kuhn, CBE Staff Attorney  
Carlos Porras, CBE Executive Director

Cc: Mayor James Hahn  
Councilperson Ruth Galanter  
Pacoima Beautiful

5610 Pacific Blvd., Suite 203 • Huntington Park, CA. 90255 • (323) 826-9771

In Northern California: 1611 Telegraph Avenue, Suite 450 • Oakland, CA 94612 • (510) 302-0430

Arthur & Eleanor Sweet  
Business Owners of  
8140 Sunland Boulevard  
Sun Valley, CA 91352

Thursday, December 12, 2002  
7:00 p.m.  
Sun Valley Recreation Center  
ENV-2002-3267-EIR (Bradley Transition Master Plan)

Comments of Arthur Sweet, Local Business Owner

My name is Art Sweet, and I have been in business in Sun Valley since 1954, almost 50 years. I have also known the folks at Bradley for almost as long, way before Waste Management bought the business.

I understand that this is their last pitch to the City to extend the facility's use as a landfill, their request to go up another 43 feet. They've even put in writing a second phase that would close the landfill and transition the facility toward transfer and recycling uses. We've co-existed all these years, Bradley's been here since 1959, and they have been a responsible business and good neighbor. Please work with their people all necessary mitigation measures that will minimize any impacts this transition master plan might generate. It is important to all our community to let them stay in business.

Thank you.

*Eleanor Sweet*  
*Arthur Sweet*

**From:** Ellen Mackey <ellenmackey@sbcglobal.net>  
**To:** <Jliao@Planning.Lacity.Org>  
**Date:** 4/20/2005 10:52:55 AM  
**Subject:** Bradley EIR

Mr. Liao,

I understand that the release of the Bradley Landfill EIR is eminent. As such, I am reminding you of my request for a copy of the the EIR and all technical documents (appendices) as per my original request in the response to the Notice of Preparation for ENV-2001-3267-EIR SCH NO 200112127, dated May 23, 2003 submitted by Carol Ann Zeihler, then President of the East Valley Coalition.

Please let me know if you have any questions or need a copy of the response letter.

Ellen Mackey  
East Valley Coalition/One LA

**CC:** Cynthia Despres <cynthia.despres@nbcuni.com>, Thom Despres <tmdesp@comcast.net>, "Joshua Stehlik" <jstehlik@nls-la.org>, <UNIQUEAERONAUTICS@peoplepc.com>, <Cardenas.CCPO1.CCLA@COUNCIL.LACITY.ORG>, <wgruel@lacity.org>, <Senator.Alarcon@sen.ca.gov>, <Senator.Romero@sen.ca.gov>, <joachinsanchez@yahoo.com>





# California Integrated Waste Management Board

Linda Moulton-Patterson, Chair  
1001 I Street • P.O. Box 4025 • Sacramento, California 95812-4025 • (916) 341-6000  
www.ciwmb.ca.gov



Winston H.  
Hickox *Secretary for*  
*Environmental*  
*Protection*

Gray Davis  
*Governor*

**RECEIVED**  
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JAN 09 2003  
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**RECEIVED**  
DEC 18 2002  
**STATE CLEARING HOUSE**

December 18, 2002

Jimmy Liao  
Los Angeles Planning Department  
200 North Spring Street, Suite 763  
Los Angeles, CA 90012

**Subject: SCH No. 2002121027: Notice of Preparation of a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan (SWFP No. 19-AR-0008) in the City of Los Angeles, Los Angeles County**

Dear Mr. Liao:

Thank you for allowing the California Integrated Waste Management Board (Board) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The Board staff has reviewed the environmental document cited above; due to its brevity, we are unable to make more substantive comments at this time.

The project as understood by Board staff from the Notice of Preparation is as follows:

- Vertical expansion of the existing landfill from 1010 feet above mean sea level to 1053 feet above mean sea level, a total increase of 43 feet.
- A Transfer Station with a design capacity of 6000 tons per day
- A Material Recovery Facility with a design capacity of 1000 tons per day

If the Board staff project description varies substantially from the proposed project as understood by the Lead Agency, Board staff request that the Lead Agency clarify any significant differences in the project description of the Draft Environmental Impact Report.

In order for Board staff to evaluate and recommend whether or not the environmental document is adequate for use in the Board's permitting process, the proposed project must be described in sufficient detail for Board staff to understand and evaluate the proposed project, the potential environmental impacts, proposed mitigation measures, and findings as presented by the Lead Agency.

The DEIR should include a detailed description of all phases of the proposed projects and consideration of all potential impacts. This would be, but not limited to, a description including

California Environmental Protection Agency

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the site's total acreage as well as the projects maximum design capacities in cubic yards, peak tons per day, peak vehicles per day, impacts from transportation, storage, processing, handling, vector control, odors, dust, noise, glare, gas, leachate, public and employee health and safety. To assist the lead agency in the evaluation of this, and future solid waste facilities projects, please see the Outlines/checklists developed by CIWMB staff which are available on our website:

Disposal Facility Outline: <http://www.ciwmb.ca.gov/LEACentral/CEQA/disposal.htm>

Transfer/Processing Station Outline: <http://www.ciwmb.ca.gov/LEACentral/CEQA/transfer.htm>

Board staff request copies of any subsequent environmental documents including, the Draft Environmental Impact Report, the Final Environmental Impact Report, the RFI, any Statements of Overriding Considerations, copies of public notices, and any Notices of Determination for this project. Refer to 14 CCR, Section 15075(d) that states: "If the project requires a discretionary approval from any state agency, the local lead agency shall also file with OPR [State Clearinghouse]."

If you have any questions regarding these comments, please contact me at 916.341.6728 or email at [rseamans@ciwmb.ca.gov](mailto:rseamans@ciwmb.ca.gov).

Sincerely,



Raymond M. Seamans  
Permitting and Inspection Branch  
Environmental Review  
Permitting and Enforcement Division  
**California Integrated Waste Management Board**

cc: Katie Shulte Joung  
State Clearinghouse  
P.O. Box 3044  
Sacramento, CA 95812-3044

Bill Marciniak  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
**California Integrated Waste Management Board**

Suzanne Hambleton, Supervisor  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
**California Integrated Waste Management Board**



# South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>

December 20, 2002

**RECEIVED**  
CITY OF LOS ANGELES

JAN 02 2003

ENVIRONMENTAL  
DEPT

Mr. Jimmy C. Liao  
Los Angeles Dept. of City Planning  
Environmental Review Section  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Dear Mr. Liao:

## **Notice of Preparation of an Environmental Impact Report for Bradley Landfill and Recycling Center Transition Master Plan**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR).

### **Air Quality Analysis**

The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be considered. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the evaluation. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

**Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

**Data Sources**

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the AQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The AQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Dr. Charles Blankson, Transportation Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development and Area Sources

SS:CB:li

LAC021205-03LI  
Control Number



# Department of Toxic Substances Control



Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Gray Davis  
Governor

December 31, 2002

**RECEIVED**  
CITY OF LOS ANGELES

JAN 02 2003

ENVIRONMENTAL  
UNIT

Mr. Jimmy Liao  
Los Angeles City Planning Department  
200 N. Spring Street, Suite 763  
Los Angeles, California 90012

## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BRADLEY LANDFILL AND RECYCLING CENTER TRANSITION MASTER PLAN, SCH NO. 2002121027

Dear Mr. Liao:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

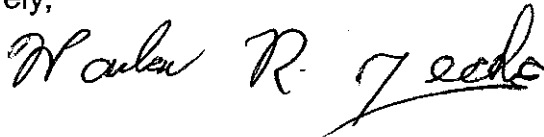
1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
2. The draft EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
4. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

Mr. Jimmy Liao  
December 31, 2002  
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,



Harlan R. Jeché  
Unit Chief  
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806



# Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
1001 "I" Street, 25<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Gray Davis  
Governor

## MEMORANDUM

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

DEC 12 2002

RECEIVED

TO: Sayareh Amirebrahimi, Branch Chief  
Site Mitigation Program, Region 3

FROM: Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section

DATE: December 9, 2002

SUBJECT: TRANSMITTAL AND REVIEW OF LEAD AGENCY ENVIRONMENTAL DOCUMENTS FOR  
*Bradley Landfill and Recycling Transition Master Plan*

The Department has received the project listed above. The project is being referred to you as a:

- Non-Essential/Information Item Only
- Sensitive Land Use Project
- Non-Sensitive Land Use Project

A Courtesy Copy of the Notice of Completion  
Transmittal Form has also been sent to:

- Permitting Branch (document not included)

The Department is encouraged to review this project and if applicable make comments pertaining to the project as it relates to hazardous waste and/or any activities which may fall within the Department's jurisdiction. Please have your staff: 1) conduct its review of the attached document prior to the end of the comment period; 2) complete the applicable items below stating whether the department made comments or that no comments were necessary for the document; and 3) return this original transmittal sheet and a copy of any response letter from your office to:

Planning & Environmental Analysis Section (PEAS)  
CEQA Tracking Center  
1001 I Street, 22<sup>nd</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806  
Fax (916) 323-3215

Date Comment Period Began: 12-4-02  
Comments due to OPR: 1-2-02

Reviewed by: *[Signature]* Date: 12/31/02

COMMENTS have been prepared and a copy has been provided to PEAS via:

- Attached Copy
- FAX (916) 323-3215

NO COMMENTS NECESSARY because:  
 All Department concerns have been adequately addressed; OR  
 Project does not fall within the Department's areas of responsibility

Thank you for your assistance with this project. If you have any questions, please contact Ken Tison, CEQA Tracking Center, at (916) 322-5266.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).



Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

January 7, 2003

RECEIVED  
CITY OF LOS ANGELES

JAN 09 2003

ENVIRONMENTAL  
UNIT

Jimmy Liao  
Los Angeles City Planning Department  
200 N. Spring Street  
Suite 763  
Los Angeles, CA 90012

Subject: Bradley Landfill and Recycling Center Transition Master Plan  
SCH#: 2002121027

Dear Jimmy Liao:

The enclosed comment (s) on your Notice of Preparation was (were) received by the State Clearinghouse after the end of the state review period, which closed on January 2, 2003. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2002121027) when contacting this office.

Sincerely,

Terry Roberts  
Senior Planner, State Clearinghouse

Enclosures

cc: Resources Agency





Mr. Jimmy Liao  
December 31, 2002  
Page 2

Win

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,

Harlan R. Jeché  
Unit Chief  
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

# Department of Toxic Substances Control

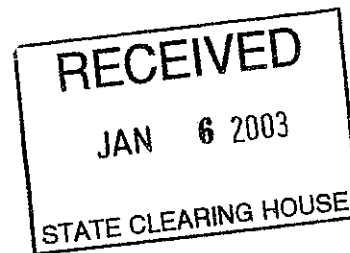


Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201

Gray Davis  
Governor

Ston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

December 31, 2002



Mr. Jimmy Liao  
Los Angeles City Planning Department  
200 N. Spring Street, Suite 763  
Los Angeles, California 90012

## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BRADLEY LANDFILL AND RECYCLING CENTER TRANSITION MASTER PLAN, SCH NO. 2002121027

Dear Mr. Liao:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
2. The draft EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
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4. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

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# Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
1001 "I" Street, 25<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Gray Davis  
Governor

## MEMORANDUM

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

DEC 12 2002

RECEIVED

TO: Sayareh Amirebrahimi, Branch Chief  
Site Mitigation Program, Region 3

FROM: Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section

DATE: December 9, 2002

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- Non-Essential/Information Item Only
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- Non-Sensitive Land Use Project

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Planning & Environmental Analysis Section (PEAS)  
CEQA Tracking Center  
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P.O. Box 806  
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Fax (916) 323-3215

Date Comment Period Began: 12-4-02

Comments due to OPR: 1-2-02

Reviewed by: [Signature]

Date: 12/31/02

COMMENTS have been prepared and a copy has been provided to PEAS via:

- Attached Copy
- FAX (916) 323-3215

NO COMMENTS NECESSARY because:

- All Department concerns have been adequately addressed; OR
- Project does not fall within the Department's areas of responsibility

Thank you for your assistance with this project. If you have any questions, please contact Ken Tison, CEQA Tracking Center, at (916) 322-5266.

12/31/02

Jimmy Liao, Project Coordinator  
LADOCF  
200 N. Spring Street, Suite 763  
LA, CA. 90012

**RECEIVED**  
CITY OF LOS ANGELES

JAN 02 2003

ENVIRONMENTAL  
UNIT

Mr. Liao,

Your letter dated 11/27/02 regarding the proposed capacity expansion of the Bradley Landfill & the construction of a transfer station was received at my place of business earlier this month. Apparently our location falls within the extremely narrow 500-foot notification area. This is my first objection to this proposed project. The project will affect an area far greater than what was canvassed for input. The process does not allow for full representation of those affected by the project. Additional notification to the surrounding community is needed if their concerns are to be seriously addressed.

I live on a hill about 2 miles from the project. The proposed 43-foot vertical increase in the height of the trash pile will have a significant negative visual impact on many hillside properties. None of these residents have been given notice of this proposed project. They should all be notified & given sufficient opportunity to respond to the proposed project.

You listed several areas of possible environmental impact in the attachment you sent with your letter. I would like to comment on them now:

#### Aesthetics

The mass of trash has already grown to a height considerably above the surrounding street level. An additional 43' increase would have a severe negative aesthetic impact for miles around in addition to the adjacent area. Perching a large transfer station on top of that will be even worse. If a transfer station is needed at this location, it should be built without increasing the existing height of the landfill.

#### Air quality

Phase I: If the additional waste were dumped at the same rate & in the same matter as it is currently being dumped, then there would presumably be no change in the level of pollution emitted into the air.

Phase II: Since the facility will be a transfer station instead of a final destination, the number of trucks will most likely double. Accordingly, the emissions from this activity will double. It would appear that phase II will have considerable negative impact on the community.

#### Hazards & Hazardous Materials

It would appear that the impact on this area, if any, would be negative, but there is not enough information in your letter to address this concern.

Hydrology/Water Quality

It would appear that the impact on this area, if any, would be negative, but there is not enough information in your letter to address this concern.

Land Use/Planning

It would appear that the impact on this area, if any, would be negative, but there is not enough information in your letter to address this concern.

Noise

The same observations I made regarding air quality would seem to apply here.

Transportation/Traffic

The same observations I made regarding air quality would seem to apply here.

Utilities/Service Systems

There is not enough information in your letter to address this concern.

Obviously the proposed projects will have a negative impact on the community.

The real questions are:

How great will the negative impact be?

Should the local community be required to bear that burden?

Are alternatives available to reduce the burden?

None of these questions can be properly addressed unless a serious effort is made to inform the entire affected area of the scope of project & they are then given adequate opportunity to respond. I hope that a serious attempt is made to determine who will be affected by the project so the Notice of completion for the EIR is made available to the entire affected area.

Sincerely,



Tom Bogna

**Classic Bath Designs, Inc.**  
**11544 Sheldon Street**  
**Sun Valley, CA 91352**

12/31/2002

JIMMY LIAO, PROJECT COORDINATOR  
LOS ANGELES DEPARTMENT OF CITY PLANNING  
200N SPRING ST #763  
LOS ANGELES CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 02 2003

ENVIRONMENTAL  
UNIT

RE BRADLEY LANDFILL.

DEAR MR LIAO

IT WAS MY UNDERSTANDING THAT BRADLEY LANDFILL WAS TO BE CLOSED. THIS CLOSURE HAS BEEN THE JUSTIFICATION FOR THE INCREASED SUNSHINE CANYON LANDFILL.


RATHER THAN A CLOSURE, LOPEZ CANYON IS A GREEN RECYCLING CENTER - BUILT TO STATE OF THE ART SPECIFICATIONS -

HOW MANY DUMPS AND MRF'S MUST SUN VALLEY ACCOMMODATE? ALREADY THE DEPARTMENT OF SANITATION IS MOVING TO WITHIN 2 BLOCKS OF THIS PROPOSED EXPANSION - FOR \$25,000,000 DPW IS BUILDING A CITY OWNED MRF. THIS WAS APPROVED BECAUSE BRADLEY WAS SUPPOSED TO BE CLOSED!! IS WASTE MANAGEMENT IN COMPETITION.

RESIDENTS WERE ASSURED THAT THE CITY WOULD NEVER ALLOW THESE TWO FACILITIES TO OPERATE SIMULTANEOUSLY.


PLEASE DO NOT ALLOW AN MRF TO BE BUILT ON TOP OF A 100 FT MOUNTAIN OF TRASH NEXT TO THE PROPOSED ONE FROM THE CITY -

MARY BENSON  
11070 Sheldon St  
Sun Valley, Ca 91352

 WALBERT ENTERPRISES  
COMPUTERS THAT MEAN BUSINESS  
11070 Sheldon Street • Sun Valley, CA 91352  
(818) 767-3237



# P A C O I M A B E A U T I F U L

 *Pacoima Beautiful*  
11243 Glenoaks Blvd., Suite 3  
Pacoima, CA 91331

December 27, 2002

Mr. Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

DEC 31 2002

ENVIRONMENTAL  
UNIT

Dear Mr. Liao,

We recently attended a meeting held at Sun Valley Recreation Center regarding Waste Management's application to increase the vertical capacity of the Bradley Landfill in Sun Valley. As an environmental organization in the Northeast San Fernando Valley, we are concerned about this request. If this application is accepted there may be many negative environmental and health effects to Sunland and Pacoima community residents.

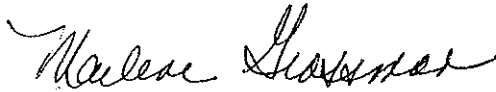
Already our communities face a variety of toxics and hazards, from the local freeways, the industries, and the landfill. With all of this, the Department of City Planning needs to take into account the cumulative environmental impacts our communities endure and how increasing the vertical capacity of the Bradley Landfill will increase this danger.

We oppose Waste Management's application because we feel that many questions are left unanswered. Pacoima Beautiful respectfully requests that there be a full Environmental Impact Report of the Bradley Landfill project, including a full analysis of the project, alternatives and all mitigation measures. Specifically, we request that the following issues be addressed:

- o The anticipated number of residents of Sun Valley and Pacoima who will suffer from asthma, high lead levels and other environmental health problems as a result of an expanded landfill.
- o An explanation of all chemicals/toxics/etc. that will be increased by the expansion of the landfill and the extent of the potential problems associated with the increase of the chemicals/toxics/etc.

- The impact of the expansion of the landfill on the ground water near the landfill and throughout the Northeast San Fernando Valley.
- The impact of increased dust particles on the health of children at schools near the landfill.

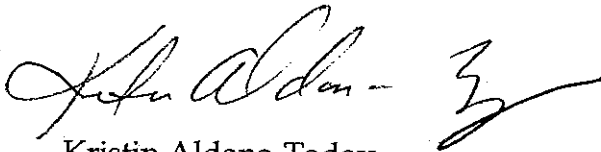
Sincerely,



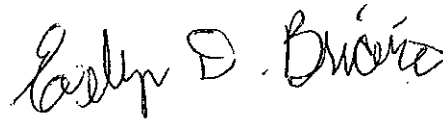
Marlene Grossman  
Executive Director



Liseth Romero-Martinez  
Associate Director of Programs



Kristin Aldana-Taday  
Associate Director of Administration



Evelyn Briceño  
Volunteer Coordinator



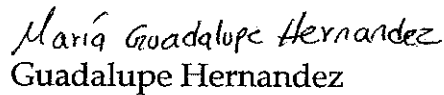
Fernando Rejón  
Youth Coordinator



Marisol Llamas  
Program Assistant



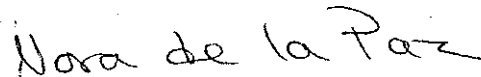
Richard Gallegos  
Outreach Representative



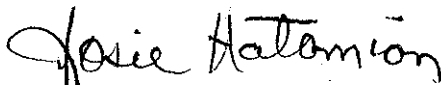
Guadalupe Hernandez  
Environmental Home Educator



Elvia Hernández  
Environmental Home Educator



Nora de la Paz  
Environmental Home Educator



Josie Hatamian  
Environmental Home Educator



Mineola Newman  
Community Inspector

cc:

Michael Paparian, Board Member

California Environmental Protection Agency, Integrated Waste Management Board

11243 Glenoaks Boulevard, Suite 3 · Pacoima, CA 91331 · Phone: 818-899-2454 · Fax: 818-834-5186





# P A C O I M A B E A U T I F U L

December 27, 2002

Mr. Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Mr. Liao,

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Already our communities face a variety of toxics and hazards, from the local freeways, the industries, and the landfill. With all of this, the Department of City Planning needs to take into account the cumulative environmental impacts our communities endure and how increasing the vertical capacity of the Bradley Landfill will increase this danger.

We oppose Waste Management's application because we feel that many questions are left unanswered. Pacoima Beautiful respectfully requests that there be a full Environmental Impact Report of the Bradley Landfill project, including a full analysis of the project, alternatives and all mitigation measures. Specifically, we request that the following issues be addressed:

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- o The impact of the expansion of the landfill on the ground water near the landfill and throughout the Northeast San Fernando Valley.
- o The impact of increased dust particles on the health of children at schools near the landfill.

Sincerely,

Marlene Grossman  
Executive Director

Liseth Romero-Martinez  
Associate Director of Programs

Kristin Aldana-Taday  
Associate Director of Administration

Evelyn Briceño  
Volunteer Coordinator

Fernando Rejón  
Youth Coordinator

Marisol Llamas  
Program Assistant

Richard Gallegos  
Outreach Representative

Guadalupe Hernandez  
Environmental Home Educator

Elvia Hernández  
Environmental Home Educator

Nora de la Paz  
Environmental Home Educator

Josie Hatamian  
Environmental Home Educator

Mineola Newmar  
Community Inspector

cc:

Michael Papanian, Board Member

California Environmental Protection Agency, Integrated Waste Management Board

11243 Glencaks Boulevard, Suite 3 · Pacoima, CA 91331 · Phone: 818-899-2464 · Fax: 818-834-5186

Jimmy Liao, Project Coordinator  
Los Angeles Dept. of Planning  
200 N. Spring St. Suite 763  
Los Angeles CA 90012  
Re: ENV. 2001-3267-EIR

Terry Hake-Church  
9738 Commerce Ave  
Tujunga, CA 91042

RECEIVED  
CITY OF LOS ANGELES

DEC 31 7 00Z

ENVIRONMENTAL  
UNIT

Dec. 30, 02

Dear Mr. Liao,

I just recently learned of this proposed project which appears to be at its most basic interpretation a proposal to allow a mountain of garbage equivalent to a three-story building in Sun Valley. I believe the alternative of no project is the only acceptable decision for this site.

The stench and airborne particulate material from the Bradley dump is already problematic for our area, and allowing this pile of garbage to expand vertically only ascerbates the problem of airborne bacteria which will harm the air quality of this area. At present, according to the AQMD we have some of the best air in southern California and many of us are working hard to continue to maintain that quality.

Council member Ruth Galantier recently was quoted in a local paper saying that Sun Valley is a city-neglected disaster which needs to be cleaned up. Adding more garbage is not going to help clean this area up, but rather adds to the local notion that the city views our area as the dumping grounds for the rest of the city's problems.

This area also provides about 1/2 of the city's water and maintaining and protecting that water source should be paramount in addressing this project.

Thank you for your time,  
Terry Hake-Church

December 30, 2002

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street, Suite 763  
Los Angeles, California 90012

**RECEIVED**  
CITY OF LOS ANGELES  
DEC 31 2002  
ENVIRONMENTAL  
UNIT

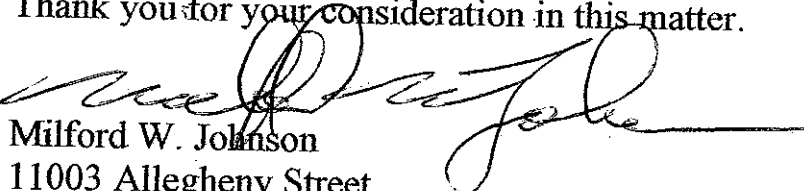
Re: ENV-2001-3267-EIR  
Bradley Landfill and Recycling Center Transition Master Plan

I object to the increase in height of the Bradley Landfill. This will eliminate my view of the buildings on Ventura Boulevard and the aesthetics of the area.

I just purchased my residence in February, 2002, as you know the three main things in real estate are location, location, location. This location provides a view of the valley over the existing landfill. I had no idea the height would be increased when I purchased.

I understand the need for disposal of waste but your plan calls for this to be a recycling center and not an active landfill in the future. It is your responsibility to provide for long range planning and not disturb the existing aesthetics.

Thank you for your consideration in this matter.

  
Milford W. Johnson  
11003 Allegheny Street  
Sun Valley, Ca. 91532

(818) 504-4355

Thomas and Cynthia Despres  
10340 Valley Glow Drive  
Shadow Hills, CA 91040

December 26, 2002

Mr. Jimmy Liao  
Project Coordinator  
Los Angeles Dept. of City Planning  
200 N. Spring St., St. 763  
Los Angeles, CA 90012

Dear Mr. Liao,

RE: Case No: ENV-2001-3267-EIR (Bradley Landfill and Recycling Center Transition Master Plan)

We strongly oppose the proposed zone variance plan that would raise Bradley landfill to an additional height of 43 feet in order to allow this site to accept more trash. Raising the already prominent mountain of trash an additional 43 feet would make this the most prominent mountain in this area creating an unsightly monstrosity. Already this area is blighted with an unfair proportion of facilities that process trash. Raising the height of Bradley to accommodate even more of L.A.'s trash would further negatively impact the quality of life and property values of the residents of Sun Valley and Shadow Hills.

Often, the stench from Bradley landfill is unbearable and has become progressively more frequent. This is already in direct violation of the terms of their current permit. Daily, we are disturbed by unhealthful odors and pollution. We suspect Bradley landfill is already creating hazardous conditions to our health as well as that of our neighbors.

At its current height, within the last year, the view from every room of our home in Shadow Hills has changed. We see a mountain of trash traveled by an endless stream of trash trucks. We purchased our home 6 years ago here in Shadow Hills because of the beautiful rural character of this community. The Shadow Hills Property Owners Association's mission statement includes the goal of preserving the rural nature of this community. Sunland Boulevard, a ¼ of a mile south of our home, has just been designated a scenic corridor. Ironically, this area has been officially recognized for its value not only to the immediate community, but to the greater Los Angeles area as well. In sharp contrast, the prospect of a mountain of trash being piled on our community owing to poor planning on the part of the Department of Sanitation, is absolutely unjust to say the least.

We understand the need for trash disposal for the greater Los Angeles area. However, our immediate community has more than done its share to support this unhealthful

We strongly urge that the City take no final action until a complete and extensive public hearing process be completed as well as a full environmental impact report subject to a public hearing.

Sincerely,

*Thomas Despres*  
*Cynthia Despres*

Thomas and Cynthia Despres

Thomas and Cynthia Despres  
10340 Valley Glow Drive  
Shadow Hills, CA 91040

December 26, 2002

Mr. Jimmy Liao  
Project Coordinator  
Los Angeles Dept. of City Planning  
200 N. Spring St., St. 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

DEC 30 2002

ENVIRONMENTAL  
UNIT

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RE: Case No: ENV-2001-3267-EIR (Bradley Landfill and Recycling Center Transition Master Plan)

We strongly oppose the proposed zone variance plan that would raise Bradley landfill to an additional height of 43 feet in order to allow this site to accept more trash. Raising the already prominent mountain of trash an additional 43 feet would make this the most prominent mountain in this area creating an unsightly monstrosity. Already this area is blighted with an unfair proportion of facilities that process trash. Raising the height of Bradley to accommodate even more of L.A.'s trash would further negatively impact the quality of life and property values of the residents of Sun Valley and Shadow Hills.

Often, the stench from Bradley landfill is unbearable and has become progressively more frequent. This is already in direct violation of the terms of their current permit. Daily, we are disturbed by unhealthy odors and pollution. We suspect Bradley landfill is already creating hazardous conditions to our health as well as that of our neighbors.

At its current height, within the last year, the view from every room of our home in Shadow Hills has changed. We see a mountain of trash traveled by an endless stream of trash trucks. We purchased our home 6 years ago here in Shadow Hills because of the beautiful rural character of this community. The Shadow Hills Property Owners Association's mission statement includes the goal of preserving the rural nature of this community. Sunland Boulevard, a ¼ of a mile south of our home, has just been designated a scenic corridor. Ironically, this area has been officially recognized for its

enterprise. We feel our future health and that of our families is being unduly compromised for the profit and by the mismanagement of the Bradley Landfill, among others.

Strong opposition has also been raised by City Council President Alex Padilla and Mayor Hahn in a letter sent on August 17, 2001 to Mr. Con Howe, Director of City Planning and

We strongly urge that the City take no final action until a complete and extensive public hearing process be completed as well as a full environmental impact report subject to a public hearing.

Sincerely,

*Thomas Despres*  
*Cynthia Despres*

Thomas and Cynthia Despres



December 29, 2002

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 North Spring Street - Suite 763  
Los Angeles, CA 90012  
Fax: (213)978-1343 Phone: (213)978-1331

Dear

RE: Bradley Dump

We want all operations, current and future, to cease at Bradley dump in Sun Valley. Waste Management must be held to their original contract, their promise.

First they filled a huge hole with garbage, then they kept going, up and up, and up! The height is now five stories or more, blocking the view of the beautiful San Gabriel Mountains. The visual blight is repulsive. The smell is terrible, and now they want to go up another four more (43 feet) stories of garbage! It will be 6:00am to midnight, seven days a week.

We already have far too many dumps in this area as well as transfer stations and recycling businesses. Right now, the Los Angeles Department of Public Works is building a \$24,740,000.00, 14 acre, East Valley Solid Resources District Yard, just across the street from the Bradley dump. And, among other things, they will accept recycleables including hazardous items!

On October 21, 2002, Doug Corcoran of Waste Management said their heavy truck traffic would triple. On November 04, 2002 Mike Qualls of Department of Public Works, said Bradley's traffic would be about as much as theirs at the East Valley Solid Resources, and he said they would have 1,390 trips per day!! And this is not to mention the rest of the traffic!

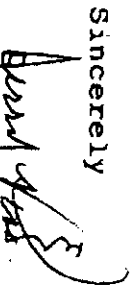
Our air quality is bad enough as it is. There are many schools and churches around this area. People complain about illnesses that could be related to the dumps. My wife has cancer, I have

high blood pressure and a heart condition, and operating on 40% of kidney function. Even our dog has diabetes and gets two insulin injections per day, compared with my one injection daily.

We are all working very hard to make Sun Valley a better community. Our property value is in jeopardy, it is difficult to get decent businesses to locate here because of the dump, and Sun Valley's reputation reputation is suffering.

The land occupied by Bradley dump would make a nice business park. We need CLEAN, people friendly businesses here in Sun Valley. We need to revitalize this area. We have suffered much too long.

Sincerely



Jerry Piro, Vice President  
East Valley Coalition



Lee Piro, Treasurer  
East Valley Coalition

8600 Robert Avenue  
Sun Valley, CA 91352-3357

RECEIVED  
CITY OF LOS ANGELES

December 29, 2002

JAN 06 2003

CITY PLANNING DEPT  
EXECUTIVE OFFICE  
ROOM 1600

Con Howe, Director  
Department of City Planning  
200 North Spring St., Room 525  
Los Angeles, CA 90012-4801

Phone: (213)978-1271 Fax: (213)978-1275

Dear Director Howe

RECEIVED  
JAN 06 2003

CITY PLANNING  
DIVISION OF LAND

RE: Bradley Dump

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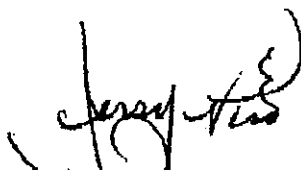
Bradley Dump, Page 2

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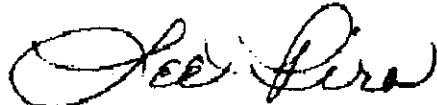
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Sincerely



Jerry Piro, Vice President  
East Valley Coalition

Phone = (818) 767-8677  
FAX = Same No.



Lee Piro, Treasurer  
East Valley Coalition

8600 Robert Avenue  
Sun Valley, CA 91352-3357

Bradley Dump, Page 3

P.S.

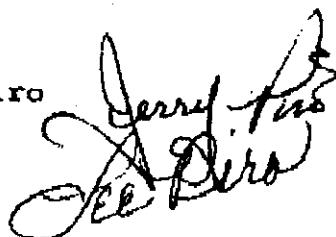
At the meeting of December 12, 2002 (what was supposed to be the Planning Department's scoping meeting) many things were wrong.

1. Almost no one was notified of the meeting. Word leaked out on December 10th, only two days before the meeting. After a great amount of work, we got over 103 people there. Only four of those said they had been notified, (however, we forgot to ask if they were employed for Bradley Dump). Residents living within 500 feet of the dump said they were not notified. Neither was Councilmember Ruth Galanter of CD6 (in whose district Bradley dump is located).
2. From December 12th to December 30th is not 30 days, the time allotted for accepting our comments.
3. The meeting was held at the Sun Valley Recreation Center during the filming of a television program, therefore no parking was available. No parking cones along the streets had that space reserved for cast and crew and the parking lot was full. People had to walk in. We did not see any signs posted outside the building to notify people of a meeting.
4. The population of Sun Valley is roughly 70% Hispanic, yet all material put out at the meeting was in English only.

After much insistence, Jimmy Liao, Project Coordinator of the Planning Department, and Doug Corcoran, District Manager of Waste Management, agreed to postpone the scoping meeting until after the new year. That is why we're concerned about the Permitting and Enforcement Committee's Agenda Item D, concerning the Bradley dump, January 6, 2003.

Respectfully

Jerry & Lee Piro



Bradley dump, Page 4

P.P.S.

Now we discover a hearing in Sacramento at the Permitting and Enforcement Committee regarding a permit for Bradley Landfill West and West Extension, L.A. County (Sun Valley) without anyone knowing about it, much less being able to comment.

I was told by that committee's staff that the obligation to outreach Sun Valley concerned citizens was the Los Angeles Planning Department! Why wasn't this done? What does this revised permit entail??? I hope and pray this pattern isn't going to continue throughout the entire EIR process.

The vast majority of people who live here, not only in Sun Valley, but the entire Northeast Valley wants the dump out! We've been dumped on long enough!!!

Respectfully

Jerry Piro

*Jerry Piro*  
*Lee Piro*

Lee Piro

**V. J. TARANDEK**

PROPERTY MANAGEMENT  
8426 SAN FERNANDO ROAD  
SUN VALLEY, CA, 91352  
818-771-0035  
FAX 818-771-0036

12-30-2002

**Jimmy Liao, Project Coordinator**  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA, 90012

**RE: EIR Case # ENV-2001-3267-EIR**  
**Bradley Landfill and recycling Center Transition Master Plan**

**Mr. Liao,**

**I am a property owner of 11782 Sheldon St., Sun Valley, CA 91352. My property consists of industrial units that are occupied by 14 small business owners and their employees.**

**I am completely against this project.**

**My tenants have had to deal with the foul smell, dust, cannon shots, bird waste and flying debris long enough. The fact that the current height of the landfill will not support the continued use though the established closure date of April 14, 2007 does not matter. Waste Management Recycling is a for profit business and the waste going into the dump is measured by the ton and has been paid for by their customers. The capacity of this dump is no magical number. They have taken in more then their site can support with-in the established closure date.**

**Please do not allow this project to move forward.**

**The city does not need extend this poorly managed waste site to make up for it lack of foresight. The waste needs to be separated and recycled now, not 5 years from now. This would have extended the life of the waste site.**

**Sincerely**

**Vladimir Tarandek**

# **V. J. TARANDEK**

**PROPERTY MANAGEMENT  
8426 SAN FERNANDO ROAD  
SUN VALLEY, CA, 91352  
818-771-0035  
FAX 818-771-0036**

**RECEIVED  
CITY OF LOS ANGELES**

**JAN 02 2003**

**ENVIRONMENTAL  
UNIT**

**12-30-2002**

**Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA, 90012**

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Bradley Landfill and recycling Center Transition Master Plan**

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**Sincerely**

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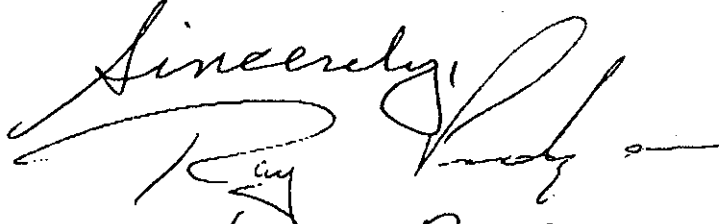
December 30, 2002

Attention: Jimmy Liao Fax (213) 978-1343  
Project Co-Ordinator  
L.A. Dept. of City Planning

From: Ray & Phyllis Pridgen Home (818) 768-6953  
9966 Stonehurst Ave. Fax (818) 768-6462  
Sun Valley, CA 91352

We strongly oppose increasing the capacity of the dump. We also, are not in favor of the many MRF's in our city of Sun Valley. That includes the transfer stations. We should not have to deal with other cities trash.

We feel that all these things harm our water table, harm our health & bring down our property values.

Sincerely,  
  
Phyllis Pridgen



# Pacoima Beautiful Youth Environmentalists

December 20, 2002

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES  
**DEC 26 2002**  
ENVIRONMENTAL  
UNIT

Dear Mr. Jimmy Liao,

We, the Pacoima Beautiful Youth Environmentalists (PBYES), dislike the fact that you want to increase the vertical capacity of the Bradley Landfill. As residents of Pacoima, we are against it because of the adverse affects it has on our community. First, the pollution resulting from a large number of trash trucks that drive through our community disperse toxic fumes that our community breathes. This directly affects the residents health, especially when they are forced to walk and breathe in the pollution. Another issue is the smell that is caused by the landfill. Many people have complained about the odors emitted by the landfill. The smell of the landfill affects the surrounding communities because the stench travels, especially with the existing wind patterns.

We believe that businesses are less willing to invest in our communities because the landfill dissuades them. Why would they want to start a business in an area where there is pollution from trash trucks and a local landfill? It also brings a bad reputation to our community because people associate our environment with pollution. It is also known that our water supply is affected by the trash that is collected, therefore polluting our ocean. The environmental impact of the landfill affects our natural resources and the health of youth in the surrounding communities.

In regards to the Public Scoping Meetings, we would like the letters that are distributed to the community about the plans for the landfill to be translated into Spanish and have a translator present at the meetings, so all residents can participate. There needs to be sufficient opportunities for residents to have a voice in the politics that affect their health. We feel that you should relocate this landfill to an area where it does not affect people. The residents of the surrounding community have the right to live in a healthy environment, therefore we do not agree with the plans of increasing the vertical capacity of the landfill by 43 feet. We do not want it to be transitioned into a transfer station/Materials Recovery Facility. We feel that you should close the landfill because it affects our community and our health.

Sincerely,

*Chyals, Verónica*  
Pacoima Beautiful Youth Environmentalists  
*Jenny Brant*

*Judith Cervantes*  
*Maria Lopez*

*John Pardo*  
*JADIRA LANDEROS*

## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
 SACRAMENTO, CA 95814  
 (916) 653-4082  
 (916) 657-5390 - Fax



December 20, 2002

**RECEIVED**  
 CITY OF LOS ANGELES

DEC 26 2002

ENVIRONMENTAL  
 UNIT

Jimmy Liao  
 Los Angeles City Planning Department  
 200 N. Spring Street, Suite 763  
 Los Angeles, CA 90012

RE: SCH# 2002121027 - Bradley Landfill and Recycling Center Transition Master Plan, Los Angeles County

Dear Mr. Liao:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

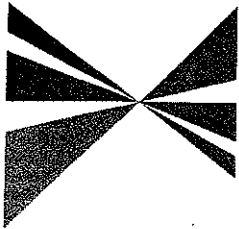
- ✓ Contact the appropriate Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check.
  - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Rob Wood  
 Environmental Specialist III  
 (916) 653-4040

CC: State Clearinghouse

SOUTHERN CALIFORNIA



**ASSOCIATION of  
GOVERNMENTS**  
Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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**Imperial County:** Hank Kuiper, Imperial County • Jo Shields, Brawley

**Los Angeles County:** Yvonne Brathwaite Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Melanie Andrews, Compton • Harry Baldwin, San Gabriel • Bruce Barrows, Cerritos • George Bass, Bell • Hal Bernson, Los Angeles • Ken Blackwood, Lomita • Robert Bruesch, Rosemead • Gene Daniels, Paramount • Ruth Galanter, Los Angeles • Mike Dispenza, Palmdale • Judy Dunlap, Inglewood • Eric Garcetti, Los Angeles • Wendy Greuel, Los Angeles • James Hahn, Los Angeles • Janice Hahn, Los Angeles • Nate Holden, Los Angeles • Sandra Jacobs, El Segundo • Tom LaBonge, Los Angeles • Bonnie Lowenthal, Long Beach • Keith McCarthy, Downey • Cindy Miscikowski, Los Angeles • Pam O'Connor, Santa Monica • Nick Pacheco, Los Angeles • Alex Padilla, Los Angeles • Jan Perry, Los Angeles • Beatrice Proo, Pico Rivera • Ed Reyes, Los Angeles • Karen Rosenthal, Claremont • Dick Stanford, Azusa • Tom Sykes, Walnut • Paul Talbot, Alhambra • Sidney Tyler, Jr., Pasadena • Dennis Washburn, Calabasas • Jack Weiss, Los Angeles • Bob Yousefian, Glendale • Dennis R. Zine, Los Angeles

**Orange County:** Charles Smith, Orange County • Ron Bates, Los Alamitos • Art Brown, Buena Park • Lou Bone, Tustin • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Shirley McCracken, Anaheim • Bev Perry, Brea • Tod Ridgeway, Newport Beach

**Riverside County:** Bob Buster, Riverside County • Ron Loveridge, RIVERSIDE • Greg Pettis, Cathedral City • Ron Roberts, Temecula • Jan Rudman, Corona • Charles White, Moreno Valley

**San Bernardino County:** Bill Alexander, Rancho Cucamonga • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Lien, San Bernardino • Gary O'vitt, Ontario • Deborah Robertson, Rialto

**Ventura County:** Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

**Riverside County Transportation Commission:** Robin Lowe, Hemet

**Ventura County Transportation Commission:** Bill Davis, Simi Valley

December 23, 2002

Mr. Jimmy C. Liao  
Project Coordinator  
City of Los Angeles  
Department of Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

DEC 26 2002

ENVIRONMENTAL  
UNIT

RE: **Comments on the Notice of Preparation for a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan – SCAG No. I 20020639**

Dear Mr. Liao:


Thank you for submitting the **Notice of Preparation for a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Notice of Preparation** and have determined that the proposed Project is regionally significant per SCAG mandates for regionally significant projects that directly relate to policies and strategies contained in the Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP). The proposed Project considers the expansion of an existing waste disposal site in excess of 40-acres. CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and **regional plans (Section 15125 [d])**. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan, which may be applicable to your project, are outlined in the attachment. **We expect the Draft EIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies.** Please use our policy numbers to refer to them in your Draft EIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.

Please provide a minimum of 45 days for SCAG to review the Draft EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

  
JEFFREY M. SMITH, AICP  
Senior Planner  
Intergovernmental Review

**COMMENTS ON THE PROPOSAL TO DEVELOP A  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
VICTORVILLE SANITARY LANDFILL  
EXPANSION PROJECT  
SCAG NO. I 20020509**

**PROJECT DESCRIPTION**

The proposed Project considers a short-term expansion of an existing landfill and the future construction of a material recovery facility. The purpose of the project is to provide for an orderly transition of the Bradley Landfill and Recycling Center from an active landfill to a transfer station / material recovery facility. The proposed project will be completed in two phases.

**CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the Bradley Landfill and Recycling Center Transition Master Plan.

*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.*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

*3.18 Encourage planned development in locations least likely to cause environmental impact.*

- 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.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 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.*

#### **GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY**

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 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.*

#### **AIR QUALITY CHAPTER CORE ACTIONS**

The **Air Quality Chapter** core actions related to the proposed project includes:

- 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.*

- 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 relationships to ensure consistency and minimize conflicts.*

## **WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

- 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.*

## **GOALS AND OBJECTIVES FOR SOLID WASTE MANAGEMENT**

The existing Solid Waste goals for the SCAG region are articulated in the state law. (Cal. Pub. Res. Code Sec. 40000 et. seq.) that governs solid waste management. These goals form the basis for solid waste planning at the city and county level and can be summarized as follows:

1. Promote the following waste management practices in order of priority:
  - Waste Prevention
  - Recycling and Composting
  - Safe Disposal or Transformation
2. Minimize unnecessary duplication of effort in solid waste programs carried out by local governments

The regional objectives for solid waste are also identified in the state solid waste law and include the following:

3. Divert at least 25 percent of all waste from landfills by the 1995, and divert at least 50 percent by the year 2000.

December 23, 2002  
Mr. Jimmy C. Liao  
Page 5

4. Ensure that there is adequate, environmentally safe disposal capacity for the remaining wastes

### **CONCLUSIONS**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.



## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

**THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)** is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
120 SO. SPRING ST.  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337  
E-Mail: NersesYerjanian@dot.ca.gov



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*Flex your power!  
Be energy efficient!*

Mr. Jimmy C. Liao  
Los Angeles Department of Planning  
Environmental Review Section  
City of Los Angeles  
200 N. Spring St., Room 763  
Los Angeles, CA. 90012

IGR/CEQA # 021207NY  
Bradley Landfill & Recycling Center  
Transition Master Plan  
LA/5/34.99

December 12, 2002

Dear Mr. Liao:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Bradley Landfill & Recycling Center Transition Master Plan.

Based on the information received, and to assist us in our efforts to completely evaluate and assess the impacts of this project on the State transportation system, a traffic study in advance of the DEIR should be prepared to analyze the following information:

Please reference the Department's **Traffic Impact Study Guideline** on the Internet at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to interstate freeway 5.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM, and PM peak-hour volumes for both existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - description of transportation infrastructure improvements
  - financial costs, funding sources and financing
  - sequence and scheduling considerations
  - implementation responsibilities, controls and monitoringAny mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.
6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The ratio should be estimated, of additional traffic due to the project, to that amount of increase in traffic for which real mitigation must be provided (see Traffic Impact Study Guidelines). We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-link travel forecast modeling might be used.

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

Stephen Buswell  
IGR/CEQA Branch Chief  
Caltrans District 07  
Regional Transportation Planning Office  
120 S. Spring St., Los Angeles, CA 90012

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 021207NY.

Sincerely,



STEPHEN J. BUSWELL  
IGR/CEQA Branch Chief  
Transportation Planning Office  
Caltrans, District 7

*"Caltrans improves mobility across California"*

**Responses to April 24, 2003 Notice of Preparation**

## Department of Water and Power



## the City of Los Angeles

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FRANK SALAS, *Chief Administrative Officer*

May 19, 2003

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Mr. Jimmy C. Liao  
Los Angeles Department of  
City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

MAY 22 2003

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Dear Mr. Liao:

Subject: Bradley Landfill and Recycling Center Transition Master Plan Project  
Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

The Los Angeles Department of Water and Power (LADWP) is in receipt of a NOP for an EIR with a due date of May 23, 2003 for public comments. The proposed project is located in the Sun Valley – La Tuna Canyon Community of the City of Los Angeles. The proposed project involves a transitional 43-foot vertical landfill expansion that will provide short-term disposal capacity and 6,000 tons of solid waste for disposal per day (tpd) transfer station, including a 1,000 tpd Material Recovery Facility.

Since the Adelanto-Toluca Transmission Line 1 appears to overlap the Bradley Landfill in the west perimeter area near Sheldon Street, LADWP offers the following comments related to proposed facility construction and operation activities:

1. Need for cleaning of insulators and related costs. Due to the construction and/or operational activities at the project site (e.g., handling of soil to cover landfill solid waste), especially those areas nearest the subject transmission line, dust from this activity may become airborne and contaminate the transmission tower insulators. Should insulators be affected by landfill operations, LADWP would install polymer insulators in the area to avoid the need for washing them on an ongoing basis. The Project Applicant is responsible for absorbing the cost for these maintenance expenses.
2. Avoid undermining structural integrity of transmission line tower(s). Since the western expansion perimeter of the landfill is not known with respect to the LADWP transmission line, there will be a need to ensure that landfill design is coordinated with LADWP. Please contact Mr. James Gokey at (213) 367-2487 to ensure structural integrity of towers and footings is not compromised, especially for any work that falls within a buffer area of any of our transmission lines.

**Water and Power Conservation ... a way of life**

111 North Hope Street, Los Angeles, California Mailing address: Box 51111, Los Angeles 90051-0100  
Telephone: (213) 367-4211 Cable address: DEWAPOLA



Mr. Jimmy C. Liao  
Page 2  
May 16, 2003

3. Standard Conditions for Construction. Enclosed is a copy of the current LADWP Standard Conditions for Construction. Conditions thereof may apply to work on the transmission line right-of-way. Any work, crossings, or other activities within the transmission line right-of-way are subject to the written approval of LADWP. Additionally any work, or activities that impact LADWP facilities shall be subject to whatever action deemed appropriate by LADWP. LADWP has made a good-faith effort to provide suitable conditions of approval for construction and operational activities near Power System assets. However, because details of the project are not available and because projects invariably encounter unforeseen circumstances, LADWP reserves the right to add or modify conditions in the future. Therefore, Project Proponent is hereby requested to submit construction plans for review and approval to:

Los Angeles Department of Water and Power  
Attention: Mr. Craig Luna, Property Manager  
111 North Hope Street, Room 1031  
Los Angeles, CA 90012

4. Water Access for the Transfer Station Site. Site plans indicate that the transfer station will be located along the San Fernando Access Road, south of Art Street. LADWP does not have a water main in this portion of the access road. There is a six-inch main on Art Street, between Ralston Avenue and Sutter Avenue. However, LADWP does have facilities at the end of Wicks Street, east of Ralston Avenue. There are three active water meters at this location serving 11724, 11720, and 11737 Wicks Street.

Please include LADWP in your EIR mailing list and address it to the undersigned in Room 1050. If there are any additional questions, please contact Mr. Val Amezcua at (213) 367-0429.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

VA:gc

Enclosure

c/enc: Mr. James Gokey  
Mr. Craig Luna  
Mr. Val Amezcua

STANDARD CONDITIONS FOR CONSTRUCTION

LADWP has made a good faith effort to provide suitable conditions of approval for construction and operational activities near Power System assets. However, because details of the project are not available and because projects invariably encounter unforeseen circumstances, LADWP reserves the right to add or modify conditions in the future.

1. Energized transmission lines can produce electrical effects including, but not limited to, induced voltages and currents in persons and objects. Licensee hereby acknowledges a duty to conduct activities in such manner that will not expose persons to injury or property to damage from such effects.
2. Department personnel shall have access to the right of way at all times.
3. Unauthorized parking of vehicles or equipment shall not be allowed on the right of way at any time.
4. Unauthorized storage of equipment or material shall not be allowed on the right of way at any time.
5. Fueling of vehicles or equipment shall not be allowed on the right of way at any time.
6. Patrol roads and/or the ground surfaces of the right of way shall be restored by the Licensee to original conditions, or better.
7. All trash, debris, waste, and excess earth shall be removed from the right of way upon completion of the project, or the Department may do so at the sole risk and expense of the Licensee.
8. All cut and fill slopes within the right of way shall contain adequate berms, benches, and interceptor terraces. Revegetation measures shall also be provided for dust and erosion control protection of the right of way.
9. All paving, driveways, bridges, crossings, and substructures located within the right of way shall be designed to withstand a combined weight of 40,000 pounds in accordance with the American Association of State Highway and Transportation Officials H20-44 (M18) wheel loadings.
10. The location of underground pipelines and conduits shall be marked at all points where they cross the boundaries of the right of way and at all locations where they change direction within the right of way. The markings shall be visible and identifiable metal post markers for underground pipelines. Utility markers flush with surface may be used on pavement.



11. All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with American National Standards Institute of Electrical and Electronics Engineers Standard 80-latest edition, IEEE Guide for Safety in AC Substation Grounding.
12. Licensee shall neither hold the Department liable for nor seek indemnity from the Department for any damage to the Licensee's project due to future construction or reconstruction by the Department within the right of way.
13. Burning shall not be allowed on the right of way.
14. Licensee shall control dust by dust-abatement procedures approved by the Department, such as the application of a dust palliative or water.
15. The right of way contains high-voltage electrical conductors; therefore, the Licensee shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
16. Licensee is hereby notified that grounding wires may be buried in the right of way; therefore, the Licensee shall notify the Department's Transmission Construction and Maintenance Business Group at (818) 771-5061, or (213) 367-8917, at least 48 hours prior to the start of any construction activities in the right of way.

17A. Vehicle Parking

An area within 50 feet on one side of each tower measured along the longitudinal direction of the right of way, 25 feet on the opposite side of each tower, and 10 feet on the remaining two sides of each tower, shall remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray.

17B. Trucking Operations and Storage Operations

An area within 50 feet on one side of each tower measured along the longitudinal direction of the right of way, and 25 feet on the remaining three sides of each tower, shall remain open and unobstructed for maintenance and

emergencies, including periodic washing of insulators by high-pressure water spray.

17C. Permanent Structures

An area within 100 feet on all sides of each tower shall remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray.

18. Detailed plans for any grading, paving, and construction work within the right of way shall be submitted for approval to the Real Estate Business Group, Department of Water and Power, P. O. Box 51111, Room 1031, Los Angeles, California 90051-0100, no later than 45 days prior to the start of any grading, paving, or construction work. Notwithstanding any other notices given by Licensee required herein, Licensee shall notify the Department's Transmission Construction and Maintenance Business Group at (818) 771-5061, or (213) 367-8917, no earlier than 14 days and no later than two days prior to the start of any grading, paving, or construction work.
19. "As Constructed" drawings showing all plans and profiles of the Licensee's project shall be furnished to the Real Estate Business Group, Department of Water and Power, P. O. Box 51111, Room 1031, Los Angeles, California 90051-0100, within five days after completion of Licensee's project.
20. In the event that construction within the right of way is determined upon inspection by the Department to be unsafe or hazardous to Department facilities, the Department may assign a line patrol mechanic at the Licensee's expense.
21. If the Department determines at any time during construction that the Licensee's efforts are hazardous or detrimental to Department facilities, the Department shall have the right to immediately terminate said construction.
- 22A. All concentrated surface water which is draining away from the proposed facility shall be directed to an approved storm drain system where accessible, or otherwise restored to sheet flow before being released within or from the right of way.
- 22B. Drainage from the paved portions of the right of way shall not enter the unpaved area under the towers. Drainage diversions such as curbs shall be used on three sides of each tower. The open side of each tower shall be the lowest elevation side to allow storm water which falls under the tower to drain. The area under the towers shall be manually graded to sheet flow out from under the towers.
- 22C. Ponding or flooding conditions within the right of way shall not be allowed, especially around the transmission towers. All drainage shall flow off of the right of way.

- 22D. Licensee shall comply with all Los Angeles County Municipal Storm Water Permit and Standard Urban Storm Water Mitigation Plan requirements.
- 23A. Fills, including backfills, shall be in horizontal, uniform layers not to exceed six inches in thickness before compaction, then compacted to 90 percent relative compaction in accordance with the American Society for Testing and Materials D1557.
- 23B. The top two inches to six inches of the concrete footings of the towers shall remain exposed and not covered over by any fill from grading operations.
- 23C. Licensee shall provide the Department with one copy each of the compaction report and a Certificate of Compacted Fill, for clean fill compaction within the Department's right of way in accordance with the American Society for Testing and Materials D1557, approved by a geotechnical engineer licensed in the State of California.
24. A surety bond in the amount to be determined by the Department shall be supplied by the Licensee to assure restoration of the Department's right of way and facilities, and compliance with all conditions herein.
25. The Licensee shall obtain and pay for all permits and licenses required for performance of the work and shall comply with all laws, ordinances, rules, orders, or regulations including, but not limited to, those of any agencies, departments, districts, or commissions of the State, County, or City having jurisdiction thereover.
26. The term "construction", as used herein, refers only to that construction incidental to the maintenance or repair of the existing (requested facility) and shall not be construed to mean permission to construct any additional (requested facility).
27. Signs shall not exceed 4 feet wide by 8 feet long, shall not exceed a height of 14 feet, shall be constructed of noncombustible materials, and shall be installed manually at, and parallel with, the right of way boundary.
28. Remote-controlled gates, or lock boxes containing the device or key for opening the remote-controlled gates, shall be capable of being interlocked with a Department padlock to allow access to the right of way by the Department. Licensee shall contact the Right of Way Supervisor at (818) 771-5061, or (213) 367-8917, to coordinate the installation of a Department padlock.
29. Licensee's cathodic protection system, if any, shall have a

design that does not cause corrosion to Department facilities. A detailed design of the Licensee's cathodic protection system shall be submitted for approval to the Real Estate Business Group, Department of Water and Power, P. O. Box 51111, Room 1031, Los Angeles, California 90051-0100, no later than 45 days prior to the start of construction or installation of the cathodic protection system.

- 30A. Licensee shall install K-rails at a distance of 10 feet from each side of the tower base for protection of towers. A distance of 5 feet from the tower base may be acceptable in locations where the patrol roads would be obstructed.
- 30B. Licensee shall install removable pipe bollards, spaced 4 feet apart, and at a distance of 10 feet from each side of the tower base for protection of towers. A distance of 5 feet from the tower base may be acceptable in locations where the patrol roads would be obstructed.
- 31A. Licensee shall provide and maintain a minimum 16-foot wide transition ramp for the patrol roads from the pavement to the ground surface. The ramp shall not exceed a slope of ten percent.
- 31B. Licensee shall provide and maintain a minimum 16-foot wide driveway and gate at all locations where the (road/street) crosses the Department's patrol roads.
32. Licensee shall post a sign on the entrance gate to the right of way, or in a visible location inside the entrance gate, identifying the contact person's name and telephone number for the prompt moving of (vehicles/trucks/trailers/containers) at times of Department maintenance or emergency activities, or any other event that (vehicles/trucks/trailers/containers) must be moved. In emergency conditions, the Department reserves all rights at any time to move or tow (vehicles/trucks/trailers/containers) out of specific areas for any transmission operation or maintenance purposes.

# michael helms

P H O T O G R A P H Y

*Jim Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca 90012*

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MAY 22 2003

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May 13, 2003

Dear Jim Liao;

*I am a concerned citizen who would like to go on record as being strongly opposed to the granting of any permit that would allow Waste Management Inc to continue to expand its operations at Bradley landfill in Sun Valley. I am also very much opposed to the proposed phase II project at Bradley that includes a MRF and transfer station.*

*This area is home to 17 landfills, each with their share of environmental, aesthetic and health issues. The Bradley landfill has contributed to the noise, water and air pollution in the area for decades, and the proposed mitigation measures would not be sufficient to guarantee no potential associated health risks.*

*Local residents have long been patient with the many negative impacts from the landfill, anticipating this year's closure. We have waited for this closure to finally occur so that the smell, noise and unsightly mound of garbage would finally be reduced and put to an end.*

*Allowing the proposed transfer station and MRF would be granting permission for the landfill's continued contribution to the decline of the health and well being of nearby residents, workers, and school children. There are many other more appropriate areas for siting the transfer station that would not be as proximate to residential areas. It is a tragedy that children are unable to go outside to play because of air quality issues that are directly associated with the landfill.*

*I strongly urge you to support our Mayor, City Council President, and our local City Council members, along with thousands of local residents in opposing both the expansion and the transfer station/MRF project at the Bradley landfill.*

Thank you!

Sincerely,



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May 19, 2003

Mr. Jimmy Liao, Project Coordinator  
 Los Angeles Department of City Planning  
 200 N. Spring Street, Suite 763  
 Los Angeles, CA 90012

Dear Mr. Liao:

As long-time residents of Sun Valley, we are writing to let you know of our concerns about the latest landfill expansion.

We are aware of the environment harms and do not feel we need to increase the pollution in our city. If there is a possibility of radioactive waste, it is imperative that this expansion be stopped.

We hope you can assist us in our request not to expand this landfill.

Sincerely,



Harvey Nakamoto



Laurel Nakamoto

Harvey Nakamoto 9125 Onizuka Ave. Sun Valley, CA 91352-1320
---

Department of Water and Power



the City of Los Angeles

JAMES K. HAHN  
Mayor

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JOHN C. BURMAHLN, *Secretary*

DAVID H. WIGGS, *General Manager*  
FRANK SALAS, *Chief Administrative Officer*

Cliff Plumb  
City of Los Angeles  
Department of Water and Power  
Room 1368  
111 North Hope Street  
Los Angeles, CA 90012-2607  
(213) 367-0341

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Mr. Jimmy Liao  
Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012  
(213) 978-1331.

*LADWP*  
Comments from the City of Los Angeles, Department of Water and Power (LADWP) Regarding Preparation of an Environmental Impact Report and Public Scoping Meeting for the Proposed Bradley Landfill and Recycling Center Transition Master Plan; EIR No.: ENV-2001-3267-EIR; SCH No. 2002121027.

Dear Mr. Liao:

Please see the attached memoranda dated May 13, 2003, From: Clifford Plumb to James B. McDaniel, Deputy Assistant General Manager – Water Services, titled "Proposed Bradley Landfill and Recycling Center Transition Master Plan Request to Comment on Possible effects on Groundwater Quality".

The memorandum outlines several areas of concern regarding possible adverse effects from the proposed Bradley Landfill expansion. We request that these areas of concern be thoroughly researched and documented. Additionally, we request that some ongoing problems and, potential problems be remediated before any approval is granted.

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111 North Hope Street, Los Angeles, California Mailing address: Box 51111, Los Angeles 90051-0100  
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## Department of Water and Power



the City of Los Angeles

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DAVID H. WIGGS, *General Manager*  
FRANK SALAS, *Chief Administrative Officer*

We have one additional comment of concern that should be added, but was not included in the memorandum, as follows:

We ask that perchlorate be investigated in upstream and downstream monitoring wells. That would mean changes to the monitoring requirements in their permit. We observe perchlorate (as well as VOCs) downgradient at Tujunga Wells and have not identified the source.

Please contact me at the telephone number provided above if you require further information.

Sincerely,

*LA's the Place* *Clifford Plumb*  
Clifford Plumb

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*C. Plumb*

**CITY OF LOS ANGELES  
DEPARTMENT OF WATER AND POWER  
INTRADEPARTMENTAL CORRESPONDENCE**

Date: May 13, 2003

To: James B. Mc Daniel, Deputy Assistant General Manager – Water Services

From: Clifford C. Plumb, Engineering Geologist *Cliff Plumb*

Subject: Proposed Bradley Landfill and Recycling Center Transition Master Plan Request to Comment on Possible Effects on Groundwater Quality

---

The proposed Bradley Landfill and Recycling Center Transition Master Plan consist of two phases.

For Phase I, it is proposed that the height of the Bradley Landfill West will be increased by 43 feet from elevation 1110 to 1053. This will add approximately 4.7 million yards of additional trash to the landfill and increase the elevation of the landfill from approximately 100 feet above the surrounding ground surface to approximately 143 feet above the ground surface. The Bradley west landfill is approximately 175 feet in depth from the ground surface. Therefore, the total height of the trash would be approximately 318 feet at its highest point initially, as the landfill is expected to settle up to 50 feet. Therefore, it is anticipated that approximately 55 percent of the landfill will be below the ground surface and 45 percent will be above the ground surface.

I spoke with Bruce Matlock, Manager of Environmental Health for Bradley Landfill and Recycling. Mr. Matlock stated that there are two landfills, Bradley West and Bradley East. Both landfills are located in what was previously one large gravel aggregate mining pit. Bradley East is older, unlined, and has been closed. Bradley West is lined. However, the type of liner has changed over the years due to regulation changes from primarily clayey material liners to geotextile liners.

Clayey soil was placed at the boundary between Bradley West and Bradley East to separate the two landfills. The sides of the western portion of Bradley West are primarily lined with geotextile from the ground surface to approximately 50 feet below the ground surface. Below the geotextile sidewall liner, clayey material lines the sidewalls to total depth. At the bottom of Bradley West landfill there is a leachate collection system of drains that slope to a sump location. At the present landfill level, typically 40,000 gallons per month of leachate is pumped from the Bradley West landfill.

Mr. Matlock stated that there are groundwater monitoring wells located within 300 feet of the landfills both up-and-down-gradient. He also stated that water quality is checked regularly. There have been no significantly high levels contaminants detected other than elevated levels of VOCs such as 6.4 ppb (parts per billion) of vinyl chloride. Vinyl chloride is very toxic and can be a by-product constituent of landfill gases. Mr. Matlock theorized that the vinyl chloride is the result of landfill gas migrating through the clayey soil boundary at the east side of Bradley West Landfill and entering the alluvium and groundwater therein.

James B. Mc Daniel  
Page 2  
May 13, 2003

The 6.4 ppb of vinyl chloride was detected in groundwater in August 2001. As a result the gas collection system at the landfill was enhanced and the vinyl chloride level lowered to 2 ppb in 2002.

Mr. Matlock stated that they continually monitor local groundwater wells to ensure that groundwater does not rise and leak into the landfill. He stated that for the two decades that he has worked there, he has never seen groundwater rise to the level of the landfill. However, there was an alert issued for rising groundwater in the mid-1990s.

Additionally, I spoke with Doug Cross of the State Regional Water Quality Control Board about the preceding to verify Mr. Matlock's statements. Mr. Cross, for the most part, concurred with the aforementioned scenario.

For Phase II, it is proposed that a trash Transfer Station and a Materials Recovery Facility (MRF) be constructed adjacent to the west side of Bradley West landfill. The Transfer Station and MRF will process 6,000 tons and 1,000 tons per day of trash, respectively.

### Conclusions and Recommendations

Regarding Phase I; the thickest portion of the landfill is proposed to increase by approximately 30 percent. This will add significant weight to the existing landfill. Based on this, there is a question if the existing liners, either clay or geotextile, can withstand the extra stress from the overburden that will be placed on them. Also, an increase in height of the landfill and internal leachate collection plumbing system may place extra stress on pipes and sumps possibly causing damage to, or failure of, the existing leachate collection system.

Open File Report 80-10 LA, published by the California Geological Survey, shows the Verdugo Fault crossing the southern portion of the Bradley Landfill. Richard B. Saul, Geologist, and others have seen faults and their associated clay gouge in the east facing wall of the gravel pits at a depth of 130 feet. According to the authors, these faults are associated with the Verdugo Fault. The Verdugo Fault has a moment magnitude in the order of 6.7 and could generate large near-source ground motions during an earthquake. Additionally, a rupture on the fault could produce relatively large offsets along the main trace and subsidiary splays from the main fault.

The liners and leachate collection systems must be able to handle additional overburden stresses combined with seismic shaking and fault movements. In addition, the liner and leachate collection system must be capable of withstanding periods of seismic-induced differential settlements in order to preclude leachate from escaping from the landfill and entering the groundwater below.

Placing the proposed additional 4.7 million cubic yards trash will cause additional liquid to enter into the landfill. The liquid or leachate will be derived from the trash itself, from water used for dust and fill control, and from rainfall at the time of placement.

James B. Mc Daniel  
Page 3  
May 13, 2003

Based on the preceding discussion, we recommend that a comprehensive engineering study be conducted to determine the following before approval of this project:

- Determine if the existing liners and internal leachate collection systems can withstand the extra stress from the proposed increased overburden without being damaged and allowing fluids to leak from the landfill. Include the effects of earthquake shaking in this evaluation.
- Determine if the existing liner and internal leachate collection systems can withstand movement from the Verdugo Fault, which crosses the southern portion of the landfill.
- Determine if the existing leachate collection system can handle the extra liquid (leachate) which could increase by 25 percent or more and add a significant amount of liquid material to the landfill. If the existing system can not handle the additional liquid, then there is a potential that liquid under increased head in the landfill could escape into the surrounding groundwater aquifer.
- Determine if the piping, sumps, etc. for the leachate collection system can withstand the increase in height of the system without being damaged.
- Review the current groundwater monitoring program to ensure that the monitoring frequency and types of compounds tested meet all current standards and are sufficient to detect any leakage from both Bradley Landfills.
- Review the groundwater elevation "buffer zone" requirements and monitoring program and make sure it is in compliance with today's standards and that there is a comprehensive and adequate system of monitoring wells and constant monitoring program to detect any potentially high groundwater levels caused by water spreading at local groundwater recharge basins such as Hansen Spreading Grounds. Additionally, there should be an adequate notification system that will alert the Los Angeles County Department of Public Works immediately if groundwater reaches the danger level.
- Investigate and contain the leachate of vinyl chloride. The Federal MCL is 2 ppb and the State is 0.5 ppb. At the last testing in 2002, the groundwater below the landfill was 2 ppb; this is above the State limit. This problem should be fully understood and ameliorated before the expansion is approved. The increase in trash in the landfill is expected to increase the amount of vinyl chloride unless remediated.

For Phase II, it is proposed that a Transfer Station and Materials Recycling Facility (MRF) be built to process 6,000 tons and 1,000 per day of trash, respectively. Much of the facility apparently will be located within the footprint of the old gravel pit and possibly on some unprotected alluvium. It is imperative that these facilities and any trash stockpiles be founded on impervious material that will not allow leachate from the trash to enter the unprotected underlying alluvium and enter the groundwater.

James B. Mc Daniel  
Page 4  
May 13, 2003

Additionally, portions of the Transfer Station and MRF apparently will be located on top of the Verdugo Fault. As previously mentioned, a rupture on the Verdugo Fault could seriously damage these facilities and cause offset and damage to impervious material placed to preclude leachate from entering the alluvium and groundwater therein.

The following is recommended:

- An impermeable groundcover, possibly clayey material and a geotextile moisture barrier, should be placed on top of the alluvium. The impermeable groundcover should be overlain by a concrete slab, if possible. Prior to placement of the impermeable groundcover, a sub-drain system with sumps and pumps for leachate collection should be installed below the location of the Transfer Station, MRF, and any other proposed trash stockpiles. This sub-drain system should be constantly monitored for leachate.
- A system of Groundwater Monitoring Wells and Vadose Zone Monitoring Wells should be installed in and around the Transfer Station, MRF, and any trash stockpiles. The wells should be constantly monitored and tested for signs of leachate entering the vadose zone and / or groundwater.
- A comprehensive Engineering Design Report should be prepared to indicate where the above-mentioned, impermeable pads, underlying subdrain system, and monitoring wells would be placed and how they would work.
- A comprehensive study to determine if rupture on the underlying Verdugo Fault will damage the above-described impermeable groundcover, geotextile moisture barrier and subdrain system, and allow leachate to enter the alluvium and groundwater below the site.

For further information, please contact Clifford C. Plumb on extension 70341.

CCP:dw

Attachment

c w/att: Thomas M. Erb  
Melvin Blevins  
Mark G. Mackowski  
Hadi S. Jonny

Glenn C. Singley  
Scott J. Munson  
Craig A. Davis  
Clifford C. Plumb

Geology Group File

Groundwater Supply  
Inquiries

FileNet  
w:\geology\CCP-I-Bradley Landfill Comments.doc

# Melinda Kelley

PHOTOGRAPHY

Jim Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca 90012

RECEIVED  
CITY OF LOS ANGELES

MAY 16 2003

ENVIRONMENTAL  
UNIT

May 13, 2003

Dear Jim Liao;

*I am a concerned citizen who would like to go on record as being strongly opposed to the granting of any permit that would allow Waste Management Inc to continue to expand its operations at Bradley landfill in Sun Valley. I am also very much opposed to the proposed phase II project at Bradley that includes a MRF and transfer station.*

*This area is home to 17 landfills, each with their share of environmental, aesthetic and health issues. The Bradley landfill has contributed to the noise, water and air pollution in the area for decades, and the proposed mitigation measures would not be sufficient to guarantee no potential associated health risks.*


*Local residents have long been patient with the many negative impacts from the landfill, anticipating this year's closure. We have waited for this closure to finally occur so that the smell, noise and unsightly mound of garbage would finally be reduced and put to an end.*

*Allowing the proposed transfer station and MRF would be granting permission for the landfill's continued contribution to the decline of the health and well being of nearby residents, workers, and school children. There are many other more appropriate areas for siting the transfer station that would not be as proximate to residential areas. It is a tragedy that children are unable to go outside to play because of air quality issues that are directly associated with the landfill.*

*I strongly urge you to support our Mayor, City Council President, and our local City Council members, along with thousands of local residents in opposing both the expansion and the transfer station/MRF project at the Bradley landfill.*

Thank you!

Sincerely,



10349 Siesta Drive Shadow Hills, Ca. 91040 (818) 353-8008

Los Angeles Dept. of City Planning  
200 N. Spring St. Suite 763  
Los Angeles, Calif. 90012

**RECEIVED**  
CITY OF LOS ANGELES

MAY 16 2003

ENVIRONMENTAL  
UNIT

Attn: Jimmy Liao

Dear Sir:

I am a homeowner who has lived at my Sun Valley home since 1954. I have seen this area grow through the years, and most of that growth has been desirable and has improved my living conditions. However, lately there has been some undesirable developments within my area, one of the worst being the creation of the Bradley dump, which is about 10 or 12 blocks east of my property.

Since I live this distance from the dump, I don't see it every day, but anytime I travel east, I pass it and have to be subjected to that distasteful mountain of trash. The aesthetic effect of this on any one is very negative, especially since it blocks what used to be a pleasant view of the mountains to the east. Although I cannot smell any offensive odors, I know that the air I breathe has to be somewhat affected by the dump, and the quality of the underground water in that area is also deteriorated.

As I mentioned, this area has grown, and as a result, the traffic has increased significantly, a large part of which is due to the many trucks that use the main streets near my house that lead to the dump. Besides creating a noise and traffic problem this also is causing a rapid deterioration of the street paving.

All of these effects on our standard of living are bad enough but now that the dump operator has requested approval to expand the height and size of the dump by 43 feet, it will only add to the negative effect it has on my area, including a definite reduction in my property value, since anyone would think twice about buying my house knowing that such an ugly trash dump could grow even larger than it already is.

Therefore, I would strongly request that you disapprove the operator's request for an Environmental Impact Report that would allow the expansion, and the development of a trash recycling station that in effect would prolong the use of the dump indefinitely.

Yours truly,

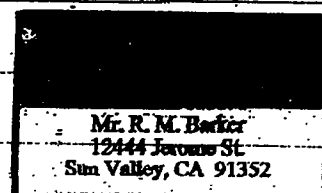
*Robert M. Barker*

*Celia M. Garcia*

**RECEIVED**  
CITY OF LOS ANGELES

MAY 15 2003

CITY PLANNING DEPT.  
ZONING ADMINISTRATION



May 6, 2003

Honorable Cindy Montañez  
Assemblymember, 39<sup>th</sup> District  
State Capitol  
P.O. Box 942849  
Sacramento, CA 94249-0039

Honorable Assemblymember Montañez:

This letter is to express my support of, Assembly Bill 1497, regarding solid waste facility permitting. I look forward to the implementation of the provisions of this bill.

AB 1497 would improve the standards for environmental reviews and mandate the consideration of environmental justice issues as part of each review. The bill would further require a closure plan for employees of landfills, prohibit changes in facility design or operation without providing notice to the community, and require that the local enforcement agency determine that the operator provided adequate notice and complied with all CEQA requirements prior to approving a permit application.

I believe these measures are a positive step in reducing the negative impact of landfills in our communities and increase the public's ability to provide meaningful input.

Sincerely,

*Robert M. Barker*

CC

Los Angeles Dept. of City Planning  
200 N. Spring St. Suite 763  
Los Angeles, Calif. 90012

RECEIVED  
CITY OF LOS ANGELES

MAY 20 2003

ENVIRONMENTAL  
UNIT

Attn: Jimmy Liao

Dear Sir:

I am a homeowner who has lived at my Sun Valley home since 1954. I have seen this area grow through the years, and most of that growth has been desirable and has improved my living conditions. However, lately there has been some undesirable developments within my area, one of the worst being the creation of the Bradley dump, which is about 10 or 12 blocks east of my property.

Since I live this distance from the dump, I don't see it every day, but anytime I travel east, I pass it and have to be subjected to that distasteful mountain of trash. The aesthetic effect of this on any one is very negative, especially since it blocks what used to be a pleasant view of the mountains to the east. Although I cannot smell any offensive odors, I know that the air I breath has to be somewhat affected by the dump, and the quality of the underground water in that area is also deteriorated.

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All of these effects on our standard of living are bad enough but now that the dump operator has requested approval to expand the height and size of the dump by 43 feet, it will only add to the negative effect it has on my area, including a definite reduction in my property value, since anyone would think twice about buying my house knowing that such an ugly trash deump could grow even larger than it already is.

Therefore, I would strongly request that you disapprove the operator's request for an Environmental Impact Report that would allow the expansion, and the development of a trash recycling station that in effect would prolong the use of the dump indefinitely.

Yours truly,

*Robert M. Barker*

*Celia M. Garcia*

CC



Mr. Robert M. Barker  
12444 Jerome St  
Sun Valley, CA 91352



May 6, 2003

Honorable Cindy Montañez  
Assemblymember, 39<sup>th</sup> District  
State Capitol  
P.O. Box 942849  
Sacramento, CA 94249-0039

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I believe these measures are a positive step in reducing the negative impact of landfills in our communities and increase the public's ability to provide meaningful input.

Sincerely,

*Robert M. Barker*

CC



Mr. William H. Arthur  
9243 Oneida Ave.  
Sun Valley, CA 91352

May 18, 2003

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MAY 20 2003

ENVIRONMENTAL  
UNIT

Mr. Jimmy Liao, Project Coordinator.  
Los Angeles Dept. of City Planning  
200 N. Spring St. - Suite 763  
Los Angeles, Calif 90012

Dear Mr. Liao.

I am writing this letter to you  
to protest the expansion of the  
landfill in Sun Valley. We already  
have enough landfills, recycling  
centers (plastic companies, washing  
yards) etc. The street by  
me, Treadwell, is a landfill  
itself as everyone dumps  
their furniture etc. and it's  
never picked up. Enough is  
enough! Put it in Encino!  
Thank you. Sincerely, William H. Arthur  
9243 Oneida Ave.  
Sun Valley, 91352

The deadline is May 23, '03



Date 5-19-03

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MAY 20 2003  
ENVIRONMENTAL  
UNIT

Dear Mr. Sinos

I Bob RENNA am a concerned citizen who would like to go on record as being opposed to the granting of any permit that would allow Waste Management Inc., to continue to expand its operations at Bradley Landfill in Sun Valley, or allow a MRF or transfer station. They are asking to operate from 6:00am to midnight ---FOREVER!

Since the 1950s my community has been home to 17 landfills. Bradley Landfill in particular has had significant impacts on the community ranging from declined property values, to air pollution, aesthetic nuisances (i.e., the mountain of trash), and heavy truck traffic near residential areas, just to name a few. By their own admission, heavy truck traffic would triple. Please do not grant them any more intrusions upon our community.

Thank you for your time and consideration to this very important letter.

Sincerely, Bob Renna

Name \_\_\_\_\_  
Address \_\_\_\_\_  
Phone \_\_\_\_\_

**BOB RENNA**  
10534 COLEBROOK ST.  
SHADOW HILLS, CA 91040  
818.951.9632

ENOUGH IS ENOUGH!

Any questions?

FAX & Phone (818) 767-8677



**California Integrated Waste Management Board**

Linda Moulton-Patterson, Chair  
 1001 I Street • P.O. Box 4025 • Sacramento, California 95812-4025 • (916) 341-6000  
 www.ciwmb.ca.gov



Gray Davis  
 Governor

Winston H.  
 Hickox Secretary for  
 Environmental  
 Protection

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 MAY 15 2003  
 ENVIRONMENTAL  
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**RECEIVED**  
 MAY 12 2003  
**STATE CLEARING HOUSE**

May 12, 2003

Jimmy Liao  
 Los Angeles Planning Department  
 200 North Spring Street, Suite 763  
 Los Angeles, CA 90012

**Subject: SCH No. 2002121027: Re-circulation of a Notice of Preparation of a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan (SWFP No. 19-AR-0008) in the City of Los Angeles, Los Angeles County**

Dear Mr. Liao:

Thank you for allowing the Environmental Review Section staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The California Integrated Waste Management Board's (Board) staff has reviewed the environmental document cited above; the project as understood from the Notice of Preparation will be done in two phases.

1. A 43 foot vertical expansion that will provide additional short-term disposal capacity within the boundaries of the existing landfill
2. A 6,000 tons per day Transfer Station and 1,000 tons per day Materials Recovery Facility that will be constructed adjacent to the existing landfill

The purpose of this plan is to provide for an orderly transition for Bradley Landfill and Recycling Center from an active landfill to a Transfer Station/MRF operation that will process solid waste for transport to other regional landfills and recycled materials processing facilities. If an end disposal site is located and the proposed Transfer Station/MRF is approved, transport may occur via rail at some point in the future.

Under Phase I of the plan, the applicant proposes to increase the maximum height of the landfill from 1010 feet above mean sea level to 1053 feet above mean sea level. The height increase will create an additional 4.7 million cubic yards of disposal capacity and allow the landfill to operate until the established closure date of April 14, 2007.

California Environmental Protection Agency

Printed on Recycled Paper

**Comment Letter Bradley Landfill SWFP 19-AR-0008**

**May 12, 2003**

During Phase I, the landfill will continue to use existing facilities and environmental controls. No changes to existing landfill operations or procedures will be required. The landfill will continue to operate under the conditions set forth under City Case No. 94-0472 (ZV) and Solid Waste Facility Permit No. 19-AR-0008. The only change requested for Phase I would be the increase in permitted height.

Phase I of the proposed plan would also encompass activities associated with closing the landfill. These would include: (1) installing a 4-foot soil cap over all surfaces of the landfill; (2) planting of vegetation on all slopes, as well as the landfill cap; and (3) constructing surface water control structures.

Under Phase II of the plan, the applicant proposes to construct a 6,000 tons per day Transfer Station and a 1,000 tons per day Materials Recovery Facility to replace the current landfill operation. As the landfill capacity is depleted, the applicant proposes to transition the existing landfill operation into a Transfer Station/MRF operation where solid waste and commercial/residential recyclable materials will be received, consolidated and transported to other regional landfills and recycled materials processing facilities.

The Transfer Station/MRF facility will be located on the west side of the existing landfill in reclaimed sand and gravel mine. The existing entrance, scales and internal roads will be used for the Transfer Station/MRF operation. All roads leading to the Transfer Station and aprons around the Transfer Station will be paved and will be capable of accommodating the projected number of trash trucks, recycling collection trucks and private vehicles that would be expected to bring materials into the facility on a daily basis, along with the projected daily number of transfer trucks and other trucks (e.g. flatbed trucks and other transport trucks) that would remove trash and recycled materials from the facility. No demolition would be required as part of this phase.

The Transfer Station/MRF will consist of a three-sided building with the open side facing the landfill. This building will be metal sided with two distinct tipping areas separated by the MRF. A small one story metal building will be located adjacent to the Transfer Station and will be used primarily for employee services. Employee parking will be adjacent to this building.

<p><b>Transfer Station</b></p>	<ul style="list-style-type: none"> <li>• Use: Incoming trucks discharge to tipping floor where waste is consolidated and re-loaded into transfer trucks for transport to other regional landfills</li> <li>• Maximum: 55,000 square feet</li> <li>• Maximum height: 55 feet above lowest grade</li> <li>• Hours of operation: 6 am to mid-night daily. Waste accepted for disposal between 6 am and 8 pm</li> <li>• Four truck loading wells for out going transfer trucks</li> </ul>
<p><b>Material Recovery Facility</b></p>	<ul style="list-style-type: none"> <li>• Use: Incoming trucks discharge single source and pre-separated materials to tipping floor where recyclables are removed and processed</li> <li>• Maximum: 40,000 square feet</li> <li>• Mechanical sorting and processing equipment</li> </ul>

**Comment Letter Bradley Landfill SWFP 19-AR-0008**

**May 12, 2003**

Support building	<ul style="list-style-type: none"> <li>• Use: office, break room and rest rooms</li> <li>• Maximum: 2,500 square feet</li> <li>• Maximum height: 15 feet</li> </ul>
Parking	<ul style="list-style-type: none"> <li>• 50 employee spaces</li> </ul>

Entitlements for the proposed project could include, but not limited to the following:

- Projected plan approval to permit an increase in the maximum height of the landfill from 1010 feet above mean sea level to 1053 feet above mean sea level.
- Solid Waste Facility Permits for transitional landfill expansion and Transfer Station/MRF.
- Waste Discharge Requirements for transitional landfill expansion.
- Air permit for transitional landfill expansion.
- Waste water discharge permit for Transfer Station/MRF.

If the Board staffs project description varies substantially from the project as understood by the Lead Agency, Board staff request that the Lead Agency clarify any significant differences in the project description of the Draft Environmental Impact Report.

### **ROLE OF THE BOARD**

The Board must ensure that solid waste facilities meet required state standards for the protection of public health, safety and the environment. The Board implements this goal through programs such as: permit oversight for solid waste facilities, certification and evaluation of Local Enforcement Agencies (LEA), which administer specific provisions of the Integrated Waste Management Act of 1989. Review of environmental documents for proposed, new or expanded solid waste facilities for compliance with CEQA, enforcement of state standards for Solid Waste Facilities, corrective action programs for facilities out of compliance with state standards and research and development for special waste management issues.

### **California Environmental Quality Act Review**

CEQA compliance is required for the establishment, expansion or change in operation(s) of a Solid Waste Facility requiring the issuance or revision of a Solid Waste Facility Permit. Board staffs review of the Draft Environmental Impact Report is to help decision-makers (1) identify potential impacts from proposed projects, (2) determine whether any such impacts are significant, and (3) ascertain whether significant impacts can be mitigated to a level of insignificance in compliance with the CEQA statute and guidelines. In order for Board staff to ascertain that the Draft Environmental Impact Report is complete and adequate for our use in the Solid Waste Facility Permit permitting process, the proposed project should be described in sufficient detail and the potential environmental impacts must be identified clearly in the environmental assessment/Initial Study Section of the Draft Environmental Impact Report.

Comment Letter Bradley Landfill SWFP 19-AR-0008

May 12, 2003

Mitigating measures to reduce potentially significant environmental impacts should be incorporated into the project, when feasible, in order to avoid potentially significant effects upon project implementation. When a potential significant environmental effect is identified and an argument is made as to why no mitigation is necessary, the discussion/analysis should be in sufficient detail that the reviewer/decision-maker can understand the Lead Agency's reasoning for their determination. In order to expedite document preparation and minimize redundancy - supporting documentation and/or studies would be helpful and should be incorporated by referenced in the Draft Environmental Impact Report.

## **BOARD STAFF'S COMMENTS**

Since the Board would be a responsible agency involved in the discretionary approval process for the Solid Waste Facility design and operational aspects of the project proposals, Board staff will need to perform an environmental review and analysis. For this project, the Board will use the Environmental Impact Report developed by the Lead Agency as required in CEQA Guidelines, Title 14 California Code of Regulations (14 CCR) Section 15096.

To assist Board staff's analysis and evaluation of this project, and aid in the determination of the adequacy of the Environmental Impact Report and related CEQA document(s), we request that the following comments and questions be addressed in the Draft Environmental Impact Report under preparation by the Lead Agency prior to circulation of the document. If these have already been addressed in an existing document (e.g. Report of Facility Information, Closure Plans and previous environmental documents), please indicate the document, page number(s) and section(s), and provide copies to the State Clearinghouse and Board along with the Draft Environmental Impact Report.

### **Final Elevation**

The Notice of Preparation indicates clearly, "the applicant proposes to increase the maximum height of the landfill from 1010 to 1,053 feet above mean sea level." Further, in the document there is mention of "installing a 4-foot soil cap over all surfaces of the landfill." Please make it clear in the Draft Environmental Impact Report what the final elevation of the landfill including the final cover is - before settlement. Please make it clear in the Draft Environmental Impact Report whether once the peak elevation is reached whether waste will continue to be added to the upper elevations as settlement occurs until final closure is completed, in its entirety. Will waste be added to maintain the landfill during the post-closure period to control differential settlement?

### **Typical Considerations for Solid Waste Facility Permits**

As required by 14 CCR §§ 15126.2, 15126.4 and 15126.6, Board staff requests that the Draft Environmental Impact Report contain detailed considerations and discussions of the significant effects, mitigation measures and alternatives for the proposed project including the alternative of "no project"

The Draft Environmental Impact Report must detail all provisions in order to indicate the ability of the facility to meet State Minimum Standards for environmental protection (see 27 CCR §§ 20005, et. seq. and 14 CCR §§ 17000 et. seq.). The following Internet link accesses checklists

**Comment Letter Bradley Landfill SWFP 19-AR-0008**

**May 12, 2003**

developed by Board staff as a guide to Lead Agencies in the preparation of Environmental Impact Reports for landfills, Transfer Stations, material recovery facilities, and composting facilities: <http://www.ciwmb.ca.gov/PermitToolbox/CheckItems/CEQA/default.htm#Guidelines>.

### **Possible Environmental Impacts**

Aesthetics, Air Quality, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Transportation/Traffic and Utilities/Service Systems have been identified by the Lead Agency as areas of possible environmental impacts. The community surrounding Bradley Landfill, in an April 24, 2003, public scoping meeting identified the following as area of concern and potential environmental impact.

- Blight
- Odors
- Road Conditions
- Cumulative Impacts
- Future Cumulative Impacts
- Health Issues
- Asthma
- Property Values
- Illegal Dumping
- Ground Vibrations
- Environmental Justice
- Social Equity
- Water Quality
- Hours of Operation
- Unlined Cells
- Gas Migration
- Set Back Issues
- Toxicity
- No Project
- Closure
- View Shed
- Load Checking
- LEA not responsive

### **CONCLUSION**

Board staff has no further comments on the project as proposed at this time. Board staff requests copies of any subsequent environmental documents including, the Draft Environmental Impact Report, the Final Environmental Impact Report, the RFI, any Statements of Overriding Considerations, copies of public notices and any Notices of Determination for this project. Refer to 14 CCR, Section 15094(c) that states: "If the project requires a discretionary approval from a state agency, the notice of determination shall also file with OPR [State Clearinghouse]."

If you have any questions regarding these comments, please contact me at 916.341.6728 or email at [rseamans@ciwmb.ca.gov](mailto:rseamans@ciwmb.ca.gov). Additional information regarding Environmental Impact Reports for Transfer Stations and/or landfills can be found on the Board's website at [www.ciwmb.ca.gov/LEACentral/CEQA/transfer.htm](http://www.ciwmb.ca.gov/LEACentral/CEQA/transfer.htm) or <http://www.ciwmb.ca.gov/LEACentral/CEQA/disposal.htm>

Sincerely,



Raymond M. Seamans  
 Permitting and Inspection Branch  
 Environmental Review  
 Permitting and Enforcement Division  
 California Integrated Waste Management Board



**Comment Letter Bradley Landfill SWFP 19-AR-0008**

**May 12, 2003**

**cc: Bill Marciniak  
Permitting and Inspection Branch, Region 1  
Permitting and Enforcement Division  
California Integrated Waste Management Board**

**Suzanne Hambleton, Supervisor  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
California Integrated Waste Management Board**

**Mark De Bie, Branch Manager  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
California Integrated Waste Management Board**

**Michael Bledsoe, Staff Council  
Legal Office  
California Integrated Waste Management Board**

**Wayne Tsuda  
Vivian Marquez  
Environmental Affairs Department  
City of Los Angeles  
200 North Spring Street, Room 1905 MS 177  
Los Angeles, CA 90012**

MARK TUTTLE

---

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CITY OF LOS ANGELES

**MAY 12 2003**

**ENVIRONMENTAL  
UNIT**

10646 Art Street  
Shadow Hills  
California 91040-1304  
Phone: 818-352-6081  
Fax: 818-352-6082  
mark.p3ts@att.net

9 May 2003

Mr. Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street  
Suite 763  
Los Angeles, CA 90012  
**RE: BRADLEY GARBAGE DUMP EXPANSION**

Dear Mr. Liao:

I have been a Shadow Hills resident for twenty-three years. When I first moved into my neighborhood, the Bradley "landfill" was relatively unobtrusive. In the years since it has grown to become a behemoth, rising above every surrounding building, visible from miles around as it creates dust, noise and more importantly: STENCH.

I have read the Waste Management public relations releases as to how carefully they control the odors and gases omitted from this rising mountain of waste in our neighborhood. Hogwash. Every year there are more and more days when the sweet stink of garbage permeates the surrounding residential neighborhoods, especially approaching along Sheldon Street or Glenoaks Boulevard, where this towering mound of garbage has now risen to dominate the skyline. The last few years there have been days when the stink is detectable over two miles away, amid the homes of Shadow Hills. Ask me how I know. The gall of the landfill's management claiming to have the stench of garbage controlled when that is so obviously not the case is infuriating.

The expansion plans this corporation is hoping to carry out will only bring further blight to a neighborhood struggling, and winning the struggle, to rise above its beginnings. Much of the northeast valley is low income, granted, but allowing dinosaurs of the past such as Bradley to broaden its deleterious influence preclude it from ever being anything more. This for-profit monster no longer belongs in its inappropriate site, convenience its only virtue. It is simply unacceptable.

Please mandate that this huge, stinking mound finally stop growing and cover the grave of Bradley once and for all. Virtually everybody other than those whose only concern is making money demand it.

Sincerely yours,

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

May 8, 2003

Re: Bradley Landfill Expansion & Transfer Station

Dear Mr. Liao:

RECEIVED  
CITY OF LOS ANGELES

MAY 09 2003

ENVIRONMENTAL  
UNIT

In addition to all the issues I brought up in my letter dated April 16, 2003, I urgently request that you read the articles I have attached and pass the information on to the correct E.I.R. personnel for the upcoming study. One is an article from the March 5, 2003, edition of the Los Angeles Daily News in which it sites a report that the Bradley Landfill has higher than normal gross beta radiation.

The second article is from the Environmental Protection Agency and sites the health impact of these beta particles. I am very concerned about the following excerpt:

*"How can beta particles affect people's health?"*

*Beta radiation can cause both acute and chronic health effects. Acute exposures are uncommon. Contact with a strong beta source from an abandoned industrial instrument is the type of circumstance in which acute exposure could occur. Chronic effects are much more common.*

*Chronic effects result from fairly low-level exposures over a long period of time. They develop relatively slowly (5 to 30 years for example). The main chronic health effect from radiation is cancer.* "

The E.I.R. needs to include a study of the impact of constant low-level exposure to beta radiation on residents and employees that live and work in close proximity to the landfill. If the Bradley Landfill is granted its' permit to add an additional 43' of garbage one can only deduce that the risks of ongoing exposure will be greatly increased as well.

I would also like to have the E.I.R. address how the sorting of toxic and/or radio active garbage at a Transfer Station impacts possible toxic particles loosened into the air and the effect that will have on the surrounding community.

Sincerely,



Sharon McEveety  
10901 Elinda Place (corner of Peoria)  
Sun Valley, CA 91352  
818-504-2633

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Article Published: Wednesday, March 05, 2003 - 7:31:21 PM PST

## Calabasas dump water tests radioactive

By Kerry Cavanaugh  
Staff Writer

State-ordered tests detected three types of radioactive material in the groundwater and runoff at Calabasas Landfill, but officials said Wednesday that they need to do more studies to determine whether the levels are hazardous.

Officials tested for six categories of radiation at 50 landfills statewide and found contamination at 29, including the Calabasas Landfill, as well as the Bradley Landfill in Sun Valley and Sunshine Canyon in Granada Hills.

The information in the report will be used as lawmakers consider legislation that would ban the dumping of low-level radioactive waste at landfills.

"What we've got gives us a good starting point in terms of pursuing how California will go about solving this issue," said William Rukeyser, spokesman for the California Environmental Protection Agency.

He also noted that the contamination had not migrated off-site.

"The main thing for people to remember is this, most of the high readings are found in the (landfill liquid), contained within landfills just as it should be," Rukeyser said.

Nuclear watchdogs and community activists said they were worried by the results.

"We have a problem that is vastly larger than we initially thought," said Daniel Hirsch, president of Committee to Bridge the Gap, an outspoken anti-nuclear dumping group.

But landfill operators downplayed the findings, saying low-level radiation is present in refuse dumped routinely at municipal landfills.

"There doesn't appear to be anything alarming," said John Gulledege, head of solid waste management at the Los Angeles County Sanitation Districts, which operates Calabasas Landfill.

"I think all that is reflection that there are certain levels of radioactivity in household trash that comes to landfills," he said.

The results come nearly a year after Rocketdyne's Santa Susana Field Laboratory revealed it had disposed of low-level radioactive waste at Bradley Landfill for nearly a decade. The U.S. Department of Energy, which oversaw the cleanup at the nuclear and

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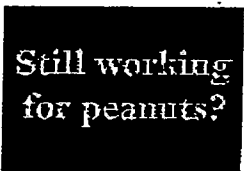
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rocket research facility near Simi Valley, later said Rocketdyne also dumped refuse at the Sunshine Canyon and Calabasas landfills.

The tests found that at the Calabasas Landfill, levels of three categories of radiation — uranium, and gross-alpha and gross-beta radiation — exceeded those that would be allowed if the water were used for drinking. Gullledge attributed the high uranium levels at Calabasas Landfill to the natural presence of the element in the soil, rather than to the dumping of radioactive waste.

"We looked at both background water quality and downstream water quality and saw it was basically the same," Gullledge said.

But Calabasas Mayor Lesley Devine was troubled by the initial findings.

"If the results are significantly higher than they should be, we have to look at a variety of options to make sure it is, No. 1, contained and, No. 2, not increased," Devine said.

Bradley exceeded recommended levels of gross-beta radiation, but the dump's owner said the amounts were not extraordinary.

"They are certainly in the range of what you would find in solid waste (landfill (runoff)," said Charles White, director of regulatory affairs with Waste Management Inc., which runs Bradley.

Sunshine Canyon tested for excessive levels of tritium, an element that was found in many of the landfills surveyed during the state-ordered study.

State environmental officials said the initial tests give them the chance to get a "statistical handle on what in fact is out there," Rukeyser said.

He also noted that tests generally showed the radioactivity had not migrated from the landfill sites.

"The main thing for people to remember is this: Most of the high readings are found in the (runoff), contained within landfills, just as it should be," Rukeyser said.

However, Hirsch was not satisfied with those assurances.

"This is a very powerful warning flag that we have to ban immediately any radioactive waste going into landfills."

Gov. Gray Davis last year vetoed a bill that would have banned the dumping of low-level radioactive waste at landfills.

Sen. Gloria Romero, D-Rosemead, has reintroduced similar legislation this session. A hearing on her bill will be held at 10 a.m. Friday at the Ronald Reagan State Building, 300 S. Spring St., Los Angeles.



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Feedback

## Gross Beta Radiation

### Environmental Protection Agency fact sheet

#### What are beta particles?

Beta particles are subatomic particles ejected from the nucleus of some radioactive atoms. They are equivalent to electrons. The difference is that beta particles originate in the nucleus and electrons originate outside the nucleus.

#### What are the properties of beta particles?

Beta particles have an electrical charge of -1. Beta particles have a mass of 549 millionths of one atomic mass unit, or AMU, which is about 1/2000 of the mass of a proton or neutron. The speed of individual beta particles depends on how much energy they have, and varies over a wide range.

While beta particles are emitted by atoms that are radioactive, beta particles themselves are not radioactive. It is their energy, in the form of speed, that causes harm to living cells. When transferred, this energy can break chemical bonds and form ions.

#### What conditions lead to beta particle emission?

Beta particle emission occurs when the ratio of neutrons to protons in the nucleus is too high. Scientists think that an excess neutron transforms into a proton and an electron. The proton stays in the nucleus and the electron is ejected energetically.

This process decreases the number of neutrons by one and increases the number of protons by one. Since the number of protons in the nucleus of an atom determines the element, the conversion of a neutron to a proton actually changes the radionuclide to a different element.

Often, gamma ray emission accompanies the emission of a beta particle. When the beta particle ejection doesn't rid the nucleus of the extra energy, the nucleus releases the remaining excess energy in the form of a gamma photon.

The decay of technetium-99, which has too many neutrons to be stable, is an example of beta decay. Scientists think that a neutron in the nucleus converts to a proton and a beta particle. The nucleus ejects the beta particle and some gamma radiation. The new atom retains the same mass number, but the number of protons increases to 44. The atom is now a ruthenium atom.

Other examples of beta emitters are phosphorous-31, tritium (H-3), carbon-14, strontium-90, and lead-210.

#### Which radionuclides are beta emitters?

There are many beta emitters.

- tritium
- cobalt-60
- strontium-90

Gross Beta Radiation Environmental Protection Agency fact sheet

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- technetium-99
- iodine-129 and -131
- cesium-137

### **What happens to beta particles in the environment?**

Beta particles travel several feet in open air and are easily stopped by solid materials. When a beta particle has lost its energy, it is like any other loose electron. Whether in the outdoor environment or in the body, these electrons are then picked up by a positive ion.

### **How are people exposed to beta particles?**

There are both natural and man-made beta emitting radionuclides. Potassium-40 and carbon-14 are weak beta emitters that are found naturally in our bodies. Some decay products of radon emit beta particles, but its alpha-emitting decay products pose a much greater health risk.

Beta emitters that eject energetic particles can pose a significant health concern. Their use requires special consideration of both benefits and potential, harmful effects.

- Key beta emitters used in medical imaging, diagnostic and treatment procedures are technetium-99m, phosphorus-32, and iodine-131. For example, people who have taken radioactive iodine will emit beta particles. They must follow strict procedures to protect family members from exposure.
- Radioactive iodine may enter the environment during a nuclear reactor accident and find its way into the food chain.
- Industrial gauges and instruments containing concentrated beta-emitting radiation sources can be lost, stolen, or abandoned. If these instruments then enter the scrap metal market, or someone finds one, the sources they contain can expose people to beta emitters.

At one time, strontium-90 was the major man-made beta emitter in the environment. Fallout from atmospheric nuclear testing from the 1950's to the early 1970's spread strontium-90 worldwide. However, most of the strontium-90 from these tests has now decayed away.

Testing also released large amounts of cesium-137 into the environment. Although, cesium-137 emits beta radiation, its gamma radiation is of greater concern. Some cesium-137 from fallout remains in the environment, but most of it has decayed as well.

### **Does the way a person is exposed to beta particles matter?**

Yes. Direct exposure to beta particles is a hazard, because emissions from strong sources can redden or even burn the skin. However, emissions from inhaled or ingested beta particle emitters are the greatest concern. Beta particles released directly to living tissue can cause damage at the molecular level, which can disrupt cell function. Because they are much smaller and have less charge than alpha particles, beta particles generally travel further into tissues. As a result, the cellular damage is more dispersed.

## How can beta particles affect people's health?

Beta radiation can cause both acute and chronic health effects. Acute exposures are uncommon. Contact with a strong beta source from an abandoned industrial instrument is the type of circumstance in which acute exposure could occur. Chronic effects are much more common.

Chronic effects result from fairly low-level exposures over a long period of time. They develop relatively slowly (5 to 30 years for example). The main chronic health effect from radiation is cancer. When taken internally beta emitters can cause tissue damage and increase the risk of cancer. The risk of cancer increases with increasing dose.

Some beta-emitters, such as carbon-14, distribute widely throughout the body. Others accumulate in specific organs and cause chronic exposures:

- Iodine-131 concentrates heavily in the thyroid gland. It increases the risk of thyroid cancer and other disorders.
- Strontium-90 accumulates in bone and teeth.

## What is gross beta radioactivity?

The gross beta radioactivity analyses is performed on the samples collected weekly. It is simply a measurement of all beta activity present, regardless of specific radionuclide source. Gross measurements are used as a method to screen samples for relative levels of radioactivity.

Specific analyses of beta-emitting isotopes are made at the end of each quarter when samples are composited by location.

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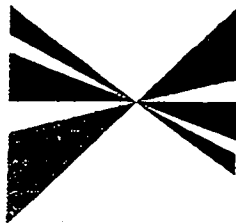


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John Lowe, Hemet

Santa Clara County Transportation Commissioners:  
Bill Davis, Simi Valley

May 7, 2003

Mr. Jimmy C. Liao  
Project Coordinator  
City of Los Angeles  
Department of Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

RE: **Comments on the Notice of Preparation for a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan - SCAG No. 1 20030204**

Dear Mr. Liao:

Thank you for submitting the **Notice of Preparation for a Draft Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan to SCAG** for review and comment. As areawide clearinghouse for regionally significant projects SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Notice of Preparation** and have determined that the proposed Project is regionally significant per SCAG mandates for regionally significant projects that directly relate to policies and strategies contained in the **Regional Comprehensive Plan and Guide (RCPG)** and **Regional Transportation Plan (RTP)**. The proposed Project considers the expansion of an existing waste disposal site in excess of 40-acres. CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's **Regional Comprehensive Plan and Guide** and **Regional Transportation Plan**, which may be applicable to your project, are outlined in the attachment. We expect the **Draft EIR** to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your **Draft EIR**. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the **Proposed Project**.

Please provide a minimum of 45 days for SCAG to review the **Draft EIR** when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Regional Planner  
Intergovernmental Review

May 7, 2003  
Mr. Jimmy C. Liao  
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**COMMENTS ON THE PROPOSAL TO DEVELOP A  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
BRADLEY LANDFILL / RECYCLING CENTER  
TRANSITION MASTER PLAN PROJECT  
SCAG NO. I 20030204**

**PROJECT DESCRIPTION**

The proposed Project considers a short-term expansion of an existing landfill and the future construction of a material recovery facility. The purpose of the project is to provide for an orderly transition of the Bradley Landfill and Recycling Center from an active landfill to a transfer station / material recovery facility. The proposed project will be completed in two phases.

**CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the Bradley Landfill and Recycling Center Transition Master Plan.

*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.*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

*3.18 Encourage planned development in locations least likely to cause environmental impact.*

May 7, 2003  
Mr. Jimmy C. Liao  
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- 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.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 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.*

### **GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY**

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 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.*

### **AIR QUALITY CHAPTER CORE ACTIONS**

The Air Quality Chapter core actions related to the proposed project includes:

- 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.*

May 7, 2003  
Mr. Jimmy C. Liao  
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*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 relationships to ensure consistency and minimize conflicts.*

## **WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

*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.*

## **GOALS AND OBJECTIVES FOR SOLID WASTE MANAGEMENT**

The existing Solid Waste goals for the SCAG region are articulated in the state law. (Cal. Pub. Res. Code Sec. 40000 et. seq.) that governs solid waste management. These goals form the basis for solid waste planning at the city and county level and can be summarized as follows:

1. Promote the following waste management practices in order of priority:
  - Waste Prevention
  - Recycling and Composting
  - Safe Disposal or Transformation
2. Minimize unnecessary duplication of effort in solid waste programs carried out by local governments

The regional objectives for solid waste are also identified in the state solid waste law and include the following:

3. Divert at least 25 percent of all waste from landfills by the 1995, and divert at least 50 percent by the year 2000.

May 7, 2003  
Mr. Jimmy C. Liao  
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4. Ensure that there is adequate, environmentally safe disposal capacity for the remaining wastes

### **CONCLUSIONS**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

May 7, 2003  
Mr. Jimmy C. Liao  
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## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '194, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity of Projects, Plans and Programs* to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

May 5, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca. 90012

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**ENVIRONMENTAL  
UNIT**

Re: Bradley Landfill and Recycling Center Transition Master Plan  
ENV-2001-3267-EIR; SCH NO 2002121027

The proposed increase in height of the Bradley Landfill will obstruct my view, and hundreds of others in the San Fernando Valley. When I purchased my home last year, I was informed of earthquakes, floods, airplanes, and many other things that would affect my property value but not one mention of a large mountain rising up an additional 10 feet and then 43 feet that would cut off my view of the buildings along Ventura Blvd.

The definition of a valley is a stretch of low land lying between hills or mountains. Not a large man made mountain built in the middle for no other reason than to make huge sums of money for a private company. "I sure hope no one at City Hall is getting any".

Currently the man made mountain effects the views of all of the hill property in Sun Valley, Shadow Hills, Lakeview Terrace, and Pacoima. If the proposed height increase is approved the views of the home owners in all of the following areas will be affected by the orange glow at night and hundreds of heavy trucks dumping raw trash in daylight. Studio City, Sherman Oaks, Encino, Tarzana, Woodland Hills, and beyond including all of the north side of the Hollywood Hills.

My home is located on the side of a small hill in Shadow Hills. I have a great view of the high-rise buildings along Ventura Blvd across the valley from me. I have enclosed a photocopy of a picture taken from my patio. As you know the three main things in real estate are location, location, location. You can see how cutting off my entire view of these buildings would effect my property value. And the aesthetics and property value of all of the view property in the communities mentioned above.

I am sure you have a large problem with waste disposal but please don't let poor planning in the past effect our future. Do not allow the Bradley Landfill to increase in height.

Thank you for your consideration in this matter.

Butch Johnson                      [www.battketch@aol.com](mailto:www.battketch@aol.com)  
11003 Allegheny St              (818) 504 4355  
Sun Valley, Ca. 91352

CC; Mayor James Hahn  
City Attorney Rocky Delgadillo  
Councilmembers;

Sherman Oaks Homeowners Association  
Sherman Oaks Neighborhood Council  
Studio City Chamber of Commerce  
East Valley Coalition

Wendy Greuel-2  
Dennis Zine-3  
Tom LaBonge-4  
Jack Weiss-5  
Ruth Galanter-6  
Alex Padilla-7  
Hal Benson-12



## Department of Toxic Substances Control



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California Environmental  
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Edwin F. Lowry, Director  
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Glendale, California 91201

Gray Davis  
Governor

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**ENVIRONMENTAL  
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Mr. Jimmy Liao  
Los Angeles City Planning Department  
200 North Spring Street, Suite 763  
Los Angeles, California 90042

### NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BRADLEY LANDFILL AND RECYCLING CENTER TRANSITION MASTER PLAN, SCH NO. 2002121027

Dear Mr. Liao:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of a draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area.
2. The draft EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
3. The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
4. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

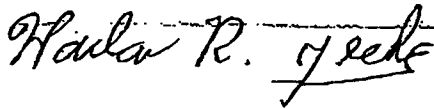
*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*



Mr. Jimmy Liao  
May 2, 2003  
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,



Harlan R. Jeché  
Unit Chief  
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806



# Department of Toxic Substances Control



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
1001 "I" Street, 25<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Gray Davis  
Governor

## MEMORANDUM

DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

APR 18 2003

RECEIVED

TO: Sayareh Amirebrahimi, Branch Chief  
Site Mitigation Program, Region 3

FROM: Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section

DATE: April 15, 2003

SUBJECT: TRANSMITTAL AND REVIEW OF LEAD AGENCY ENVIRONMENTAL DOCUMENTS FOR  
Bradley Landfill and Recycling Center Transition master Plan  
2002/17/027

The Department has received the project listed above. The project is being referred to you as a:

- Non-Essential/Information Item Only
- Sensitive Land Use Project
- Non-Sensitive land Use Project

A Courtesy Copy of the Notice of Completion Transmittal Form has also been sent to:

- Permitting Branch (document not included)

The Department is encouraged to review this project and if applicable make comments pertaining to the project as it relates to hazardous waste and/or any activities which may fall within the Department's jurisdiction. Please have your staff: 1) conduct its review of the attached document prior to the end of the comment period; 2) complete the applicable items below stating whether the department made comments or that no comments were necessary for the document; and 3) return this original transmittal sheet and a copy of any response letter from your office to:

Planning & Environmental Analysis Section (PEAS)  
CEQA Tracking Center  
1001 I Street, 22<sup>nd</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806  
Fax (916) 323-3215

Date Comment Period Began: 04/11/2003

Comments due to OPR: 05/12/2003

Reviewed by: Moskat

Date: 5/01/03

COMMENTS have been prepared and a copy has been provided to PEAS via:

- Attached Copy
- FAX (916) 323-3215

NO COMMENTS NECESSARY because:

- All Department concerns have been adequately addressed; OR
- Project does not fall within the Department's areas of responsibility

Thank you for your assistance with this project. If you have any questions, please contact Ken Tipon, CEQA Tracking Center, at (916) 322-5266.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).

*Michael & Victoria Gaffney  
10254 Sunland Boulevard  
Shadow Hills, CA 91040  
Ph: 818-951-0481*

May 2, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

MAY 06 2003

ENVIRONMENTAL  
UNIT

**Re: EIR No.: ENV-2001-3267-EIR; SCH NO.: 2002121027  
Bradley Landfill and Recycling Center Transition Master Plan**

Dear Jimmy:

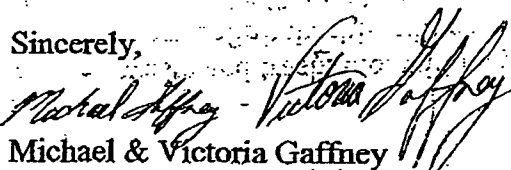
Thank you for advising me to send our comments to you regarding the above project, via letter. As property owners and residents in the greater Sun Valley – La Tuna Canyon community, both my husband and I are concerned with the proposition of new plans for Bradley Landfill. Our understanding of the proposed new landfill and concerns are as follows:

- waste and trash, etc. will be piled up instead of buried as it is now
- most definitely this will cause unpleasant odor in the surrounding areas of Sun Valley, La Tuna Canyon, Sunland, Tujunga and Shadow Hills
- the environment will be impacted as this project calls for "expansion"
- plant and animal life will be at risk
- the beauty and value of Sun Valley, La Tuna Canyon, etc. will be impacted

We appreciate and realize that our communities have grown, population has increased, thus obviously creating a strong need to provide proper landfill & recycling operations. We ask that you consider our concerns listed above seriously and include us in any planning or upcoming meetings. Have the Project Manager's considered other alternatives? If so, what are they? Has shipping/trucking the waste to other locations been considered? Is this too costly? As members of the proposed, affected community, we are concerned and would like to be included if possible in the decision making process.

Thank you for taking the time to read our letter and we look forward to a response regarding this project.

Sincerely,

  
Michael & Victoria Gaffney

**RECEIVED**  
CITY OF LOS ANGELES

MAY 06 2003

ENVIRONMENTAL  
UNIT

Doris Alwag  
12572 Mineola St.  
Pacoima, Ca. 91331

May 5, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Dept. of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca. 90012

---

Dear Mr. Liao:

It seems again that Los Angeles is continuing to expand its trash dumping to the east San Fernando Valley. Last month it was a new wrecking yard on San Fernando Road, this month you want to expand the Bradley Dump. I live approximately ½ mile from Bradley Dump. On a hot day the smell is extremely nauseating. You have allowed them to completely take over the east side. They have dug gigantic holes on property on San Fernando Road and on Glenoaks without even notifying the neighbors of these ventures. These I am sure you will eventually let them fill in with stinky trash. This is against building and safety standards of what should be allowed in a residential area. These dumps need to be put where families don't have to smell this. Stop the expansion, PLEASE.

Thank You

  
Doris Alwag

Royal Orchid Sheraton Hotel & Towers

2 CAPTAIN-BUSH LANE, SIPHYA ROAD  
BANGKOK 10500, THAILAND. TELEPHONE 2345599



We are very much  
against the expansion  
of the Broadway  
Junction. Please  
stop it!

Learn with Wattana  
Director Wattana

7653 Center  
Sun Valley,

Los Angeles

Phone 818-267-128

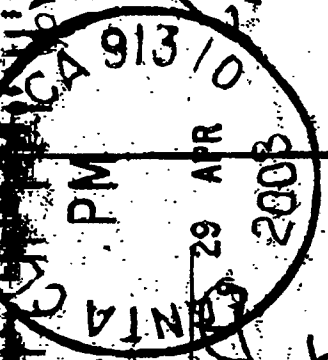
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CITY OF LOS ANGELES  
MAY 02 2003  
ENVIRONMENTAL  
UNIT



Learning  
Project Center  
Los Angeles Dr.

City Planning  
2007. Spaving  
Suite 763

Los Angeles  
CA 90012



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Hotel & Resorts network.

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CITY OF LOS ANGELES

MAY 02 2003

ENVIRONMENTAL  
UNIT9095 Rincon Ave  
Sun Valley, Calif.  
April 24, 2003

Jimmy Liao  
Los Angeles Dept of City Planning  
200 N. Spring Street Suite 762  
L.A. Ca 90012

Dear Mr. Liao:

How could you subject Sun Valley to another slap in the face. We have been down trodden in the San Fernando valley area for years. Many of the residents of this area can't read or write English and can't understand the implications of this proposal. You are taking advantage of this situation

I have lived in Sun Valley for about 40 years. I no longer want to go out on my patio in the evening and smell rotten oranges. We deserve clean water and don't want hazardous materials in our area. Let us live.

Give us a break when we are trying to upgrade our location. Please reconsider this proposal.

Sincerely

Virginia M. Helke

Susan Ball  
11205 Peach Grove Street #5  
North Hollywood, California 91601

Mr. Jimmy Liao  
Los Angeles Department of City Planning  
200 N. Spring Street Suite 763  
Los Angeles, California 90012

**RECEIVED**  
CITY OF LOS ANGELES  
MAY 02 2003  
ENVIRONMENTAL  
UNIT

April 27, 2003

Re: Bradley Landfill Expansion

Dear Mr. Liao,

As a resident and taxpayer in Los Angeles, I am very disappointed that the city is even considering expanding the Bradley Landfill. The resources used for studying expansion and setting up committees would be better spent finding an alternative dumpsite. I am surprised to hear that the landfill is scheduled to reach full capacity this year and the City of Los Angeles is now scrambling for a plan. This issue should have been addressed and resolved some 20 years ago.

I think the residents and property owners in Sun Valley have suffered enough with the landfill in their community since 1958. A landfill or dump in existence for 45 years in a residential community should alarm anyone especially during the decades when the surrounding aerospace industry has been forced to cleanup toxic and lethal wastes. One has to wonder where the cleanup ends up. Not to mention all of the bio-hazardous wastes from all of the surrounding hospitals.

I am opposed to the expansion of the Bradley Landfill. Please find an alternative dumping ground and close the landfill now.

Sincerely,



Susan Ball

CC: Mayor James Hahn  
Senator Richard Alarcon

8618 CRANFORD AVE  
 SUN VALLEY, CA. 91352  
 April 28, 03

RECEIVED  
 CITY OF LOS ANGELES

APR 30 2003

ENVIRONMENTAL  
 UNIT

Jimmy Liao, Project Coordinator  
 Los Angeles Dept. of City Planning  
 200 N. Spring Street Suite 763  
 Los Angeles, Ca. 90012

Dear Sir:

She said about plans to increase the Bradley Landfill 17 stories above the corner of San Fernando and Lankashim. Sun Valley has had enough of dumping over the years, it is time to find another area. The area had put up with the barrels, odor, dust, trucks on the streets, ruining the pavement - we have had enough!! Please consider the home owners in the Sun Valley area and close this land fill!!

Sincerely,  
 Virginia Starke



VIRGINIA STARKE  
 8610 Cranford Ave.  
 Sun Valley, CA 91352





Mr. & Mrs. Gary Remington  
8708 Sharp Ave.  
Sun Valley, CA 91352

Jimmy Liao  
Project Coordinator  
L.A. Dept. of City Planning  
200 N. Spring St.  
Suite 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES  
APR 29 2003  
ENVIRONMENTAL  
UNIT

This letter is in regards to two subject of great concern to my neighbors and my family:

My name is Delores Remington

I've lived at 8708 Sharp in Sun Valley since 1988. I have three children, one of which has breathing problems as well as myself. In 1993 I worked at Waste Management for about four months. That is all I could possible take of being ill the entire time a worked there and the down right nasty work place. I worked in their accounting office where the only windows faced the garage. There was forced or central air but often trucks came in on fire and the office filled with a horrible smoke. I complained and was told I'd get used to it. When I left, I called Cal Ocea I believe it was, but they found no violations. I went to court for my unemployment benefits and lost. They had a great legal attorney. At the time too many people had the same problem of leaving their employ and they were fighting the claims. I only have one thing to say now that I have numerous health problems and the only part of my family of five living in Sun Valley. Please, please for the children and the future of these kids in Sun Valley. Close the Bradley Dump! The water tastes nasty here. The water filter needs constant replacement. The air is horrible on trash day and lingers in the summertime. I have bone disease, use a cane and just turned 50! And I have tumors. Now they want to build a so

called Baseball Academy across the street on the old Wicks dump. This is my second concern. What are the City Planners thinking? We smell gasses all the time from over there. Can they not find a clean area to build on? Come on. Poly High's gym area has been closed at least a few times from the problem of gasses. Lawsuit regarding cancer, I believe, have been recently filed. I'm forwarding this letter to anyone I think might listen with sensitivity. When we went to see the plans for the Wicks dump, they were not even available for us to see, as stated, in the Los Angeles Times.(see attached) What a fiasco among other things! With that I close and pray everyday for the children of Sun Valley, they are my children too.

Sincerely,

*Delores Remington*

D. Remington

*A Sun Valley resident  
since 1978*

*(moved from 13137 Roscoe  
to 8708 Sharp)*

## Attachment #1 How I am aggrieved by the decision

This project will negatively impact the neighborhood close to the proposed site in a significant manner. There is already a burdensome degree of lights, noise, trash, and traffic arising from the proximity of the 170 and 5 freeways, Polytechnic High School, and Fernangeles Park. The Commission's report admits as much on in section 3 of its findings. It cynically asserts that since "The physical setting... next to the I-170 Freeway which currently provides and existing and relatively high level of ambient noise" then the project will not "... result in a perceivable increase for the surrounding residents". Sound and light levels are additive any increase will be palpable not only because of the increase of intensity, but also because of the increase of their frequency.

Currently Polytechnic High School's athletic program impacts the neighborhood with lights, noise, traffic, trash, school based and gang based physical rivalries. These difficulties are tolerable on a seasonal and sporadic basis. The proposed project will inflict these nuisances on the community on a year round, seven day per week schedule owing to the desire of the city to get maximum use from the facility, using it even when the Youth Foundation is taking a break on Sundays.

The mitigations proposed will be insufficient to bring the impact to zero.

### Attachment #3 Procedural errors

Per the Notice of Public Hearing issued by the Office of Zoning Administration concerning case no. 2002-5290(cu)(zv), the "plot plan and radius map" were to be on file at 6251 Van Nuys Boulevard. This appellant attempted to view those materials on February 19, 2003, and was told that there was no such file on the premises. Associate Zoning Administrator Jon Perica told me that I would have to come to City Hall to view the information.

Prior to the March 28 Planning Commission meeting a large, professionally made sign was erected on the landfill site. It declared sponsorship for the *proposed* Baseball Academy by the L.A. Department of Public Works and the Department of Water and Power. Since the Planning Commission had yet to approve the variance, which would allow signage on the property, the sign should not have been erected. This appellant left a message with Jon Perica concerning the sign. Mr. Perica, in turn, left a message on my answering machine stating, "That is an illegal sign".

Since I brought both of these procedural errors to the Zoning administrator's attention during the comment period, he knew or should have known that these were procedural errors under CEQA guidelines. These procedural errors should have resulted in the halting of the process. This appellant asks that the Los Angeles City Planning Commission's determination of April 9, 2003, concerning Case No. CPC 2002-5290-CU-ZV be set-aside for this reason.

Bradley Dump.!

Dear Persons April 25 - 2003

Regarding Bradley dump in  
Sun Valley as a resident of Sun  
Valley 60 yrs - (my home) here;  
I wish to express my opinion  
to not continue of Bradley dump  
be put up with this element  
in district long enough as  
I. President. Wish to move  
to Beverly Hills or some other  
district no longer here. I  
called a secretary on my  
objections at this time no noise,  
it smells also - Garbage trucks  
down my St traffic to much on  
Sheldon St. (Not in my backyard. No  
More) Sincerely, I thank you.  
Beulah O. Morley.  
12059 Sheldon St  
Sun Valley Cal  
91352

J. Eric Freedner  
11157 Leadwell Street  
Sun Valley, CA 91352  
(818) 982-2174  
email: Freedner@msn.com

April 24, 2003

RECEIVED  
CITY OF LOS ANGELES

APR 28 2003

ENVIRONMENTAL  
UNIT

Mr. Jimmy Liao  
Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Re: Bradley Landfill and Recycling Center Transition Master Plan  
EIR: ENV-2001-3267-EIR; SCH No.: 2002121027

Dear Mr. Liao:

I wished to speak at the public scoping hearing held earlier this evening at Sun Valley Middle School, but due to a schedule conflict with a North Hollywood North East Neighborhood Council meeting, I was unable to return in time. Actually, I got back exactly one minute before the 9:00 p.m. cutoff time, but the personnel were already in the process of packing up. I was encouraged to write instead.

I join with numerous community members in opposing the proposed 43-foot height increase to the landfill as set out in your Phase I. The main objection can be summarized by the fact that while a landfill up to ground level might be tolerated (with appropriate environmental concerns addressed), public outcry with the Bradley Landfill seems to rise with every proposed elevation change. A "landfill mountain" would serve as a constant reminder of the operations at Bradley. It would also seem logical that the additional weight of the proposed 4.7 million cubic yards of disposal capacity atop the existing contents would increase the rate of leachate at the bottom, causing substantial danger of incursion into the ground water supply.

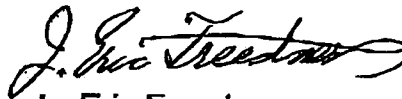
On the other hand, I do not oppose in principle the materials recovery facility as set out for Phase II. It does seem that the proposed hours of operation (6 a.m. to midnight) might be objectionable to persons living or working in the vicinity, as I do not comprehend how incoming and outgoing trucks can conduct their operations quietly. Perhaps those could be limited somewhat.

As I mentioned at the very end of tonight's meeting, however, I feel that the City may be doing an injustice to Waste Management as the landowner and user of the Bradley Landfill if it intends to "shut down the dump" as so many political figures – including Mayor Hahn – are now advocating. Waste Management bought the land with the expectation of profits from it over a set time period. What may well have happened is that due to the scarcity and shutdown of other landfills in Los Angeles (such as Lopez Canyon), a far greater amount of refuse has ended up at Bradley, shortening its expected useful life.

The City of Los Angeles has become known as a "tough place" to do business. Many large businesses have moved out due to a number of regulations and the business tax structure. The City has stated it wants to become known as a friendlier place for businesses. If that's a true municipal sentiment, and if the landfill is closed at this point, the City should carefully consider some manner of recompensing Waste Management for its loss of expected use of Bradley Landfill, perhaps in the form of business tax credits or assistance in relocating to a landfill site outside of the City limits, which will in any event have to be done for future refuse collection. Or maybe the City should buy Bradley Landfill at a reasonable price and turn it into a park or nature refuge at an appropriate future time. Said consideration should include assistance to Waste Management's employees who stand to lose their jobs when Bradley Landfill closes (now or in 2007).

I'm sure that the 3-minute clock would be ringing right about now if I were speaking these words, so I shall close and thank you for your including this letter in the official records on this matter and considering its contents.

Very truly yours,



J. Eric Freedner

cc: Mr. Doug Corcoran, Waste Management

*P.S.: I'm not a paid lobbyist nor connected in any way with Waste Management.*



George & Sarah Tenet  
CIA Base Station  
8147 Whitsett Ave.  
North Hollywood, CA 91605 -1234

because of my work, I  
have immunity from  
prosecution.

Wednesday, April 16, 2003

To: L.A. DEPT OF CITY PLANNING, 200 N. SPRING ST.,  
Room 525, LOS ANGELES, CA 90012-4801

Ladies and Gentlemen:

Thank you for sending me your notice regarding  
the BRADLEY LANDFILL TRANSITION PLAN - EIR NO.:  
ENV-2001-3267-EIR; SCH NO.: 2002121027.

You addressed the report to SARAH WEINBERGER  
because of the property records. Actually, my  
name is SARAH TENET, and I am a judge.  
My husband is CIA DIRECTOR GEORGE J. TENET,  
and we are first cousins.

To clear up the confusion, my husband's  
name will appear on the property records as  
the owner.

A reminder: President Bill Clinton appointed  
me to my judicial position, and the U. S.  
Senate voted me in. I began my judicial  
appointment on January 01, 2000, and my  
position is permanent.

I hope that you will continue to  
send me information about L.A. CITY problems.

Sincerely,  
Sarah Tenet

JUDGE SARAH TENET  
CIA BASE STATION

RECEIVED  
CITY OF LOS ANGELES

APR 18 2003

ENVIRONMENTAL  
UNIT



Coordinator

Director of City Planning

Suite 763

P. 03

12 (213) 978-1331; (213) 978-1343 (FAX)

Ms. Eleanor D. Yavarone  
11150 Chenecks Blvd #24  
Pasadena, CA 91331-6626

4-19-03

E. Yavarone

Mr. David:

I am a 15 year resident of this area, I support the above described project. It makes sense to me to use and develop an existing landfill rather than spend on build another site.

Personally, I have not experienced

any negative environmental impact, including aesthetic. On the contrary, quality appearance is being maintained.

Fax Cover: 1 Pages. (including cover) -

1.

---

**TONY PINIZZOTTO & ERIK LARSON**

11433 Stagg St., North Hollywood CA, 91605 (818) 765 - 7323/ emailonthebeach@aol.com

Attn: Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St. #763  
LA, CA 90012  
re: Landfill in Sun Valley  
April 18, 2003

**RECEIVED**  
CITY OF LOS ANGELES

APR 21 2003

ENVIRONMENTAL  
UNIT

Dear Mr. Liao,

We recently received a notice in the mail regarding a landfill development planned for the Southern area of Sun Valley, not far from our new home on 11433 Stagg St, in North Hollywood. We are writing to voice our opinions regarding this plan.

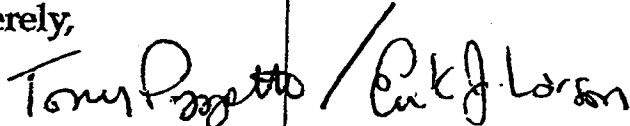
We are solely against this expansion/development. We are new to the area and would not have purchased this property had we known about these plans in advance. Therefore, we can only feel that property values would severely drop in this area, effecting an already impoverished and economically feeble area of the city.

Also, this development presents a slew of environmental dangers in an already industrial and polluted area. With the combination of air quality difficulties from nearby factories and junk yards, there is also Burbank Airport which contributes to this pollution, not to mention possible contamination to water supply, noise, traffic, and smell of rotting trash in what is essentially our backyard. We must argue to halt all plans of development. We see no economical benefit helping just this area of LA county and am disgusted that LA proper would use our area of town as their trash can. The LA offices have chosen an area of the city where *they will get almost no resistance*, taking advantage of the non-English speaking residents who's heads will be spinning so fast they won't be able to argue back. Quite clever gentlemen, indeed.

We are writing this letter because we cannot guarantee our attendance at the 4/24/2003 meeting. A copy of this letter will be sent to you as well as faxed and sent to the office of: Mayor Hahn, Mitchell Menzer, Joseph Klein, Con Howe, Franklin P. Eberhard, Gordon B. Hamilton, and Robert Sutton of the Executive Offices. *Should* this be approved we will make our opposition known in the voting booth come the next election.

We look forward to hearing from you.

Sincerely,



TONY PINIZZOTTO & ERIK LARSON

cc:Dept. of City Planning

Mitchell B. Menzer

Joseph Klein

Richard Brown

Mabel Chang

Dorene Dominguez

Javier O. Lopez

Pastor Gerard McCallum II

Bradley H. Mindlin

Tom Schriff

Executive Offices

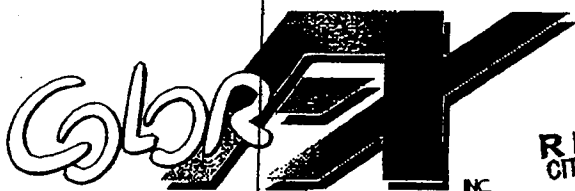
Mayor Jim K. Hahn

Con Howe - Dir.

Franklin P. Eberhard

Gordon b. Hamilton

Robert H. Sutton

RECEIVED  
CITY OF LOS ANGELES

APR 17 2003

ENVIRONMENTAL  
UNIT11050 Randall St.  
Sun Valley, CA 91352-2621  
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Toll Free. (866) 767-7675  
www.colorfxinc.com • e-mail: info@colorfxinc.com

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April 16, 2003

Attn: Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Sir,

We have received Notice of Preparation of an Environmental Impact Report for Bradley Landfill and Recycling Center (BLRC).

We are located quite close to the site of the Project. Going through the details of the Environmental Impact of the Project in the area we are seriously concerned about a number of matters that may affect our business.

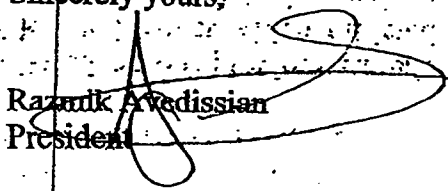
Based on our previous experience with the Project taken place in the northern side of Randall Street which inflicted heavy losses upon our company due to power shortages we are compelled to write this letter and express our serious concern about BLRC Project impacts upon our business.

Our machineries are heavy duty equipment which can not run with any kind of common power generators. Sudden power shortages can gravely cause human bodily irrevocable damages as well as financial heavy losses. Another serious environmental issue for our machinery is the fact of dust caused by the Project activities. The dust could damage our machinery and affect the quality of print we do for our clients resulting in loss of business and reputation. And finally, even though we are sure you have already considered the matter of traffic and transportation, we are mentioning this factor to express our concern as it may affect all the businesses around the site of the Project including us.

We are hoping that you would consider all these factors to avoid any later hassles.

Thank you and may God bless you.

Sincerely yours,

  
Razmik Arvedissian  
President

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

April 16, 2003

RECEIVED  
CITY OF LOS ANGELES

APR 17 2003

ENVIRONMENTAL  
UNIT

Re: April 24th Public Scoping Meeting, Bradley Landfill Expansion

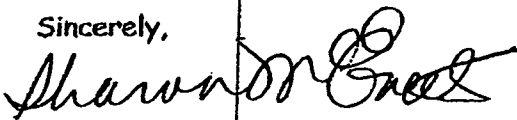
Dear Mr. Liao:

I have been a resident of Sun Valley for the past 15 years and our home is only a mile or so from the Bradley Landfill. When we purchased our home, we were assured that the dump would be at capacity and closing by the year 2000. During this time, we have experienced what life is like living in close proximity to thousands of cubic yards of garbage and the monumentally negative impact the operation of a solid waste facility has on a community. If the Landfill doesn't close and the capacity is increased, these impacts will only increase and are as follows:

- Noxious odors/lack of air quality especially noticed on hot summer nights.
- Increase of poisonous methane gas output into surrounding area.
- Heavy truck traffic and exhausts, resulting in damage to streets and air quality.
- Close proximity of children attending local schools and health risks from poor air quality.
- Health risks from unknown hazardous wastes collected with trash and left at dump.
- Toxic materials leaching into the water table and surrounding area.
- Additional noise.
- Illegal dumping (toxic?) in the areas and residential streets adjacent to the landfill.
- Earthquake impact on dump's new height and possible methane gas leaks.
- Mountain of trash obscuring views.
- Lowering of property values.
- Illegal (trucks over 6000 lbs.) use of residential streets as a short cut to the dump.
- Continuing the bad reputation which inhibits reputable business development.
- Willingness of the City of L.A. to further degrade area with ill-chosen land use allocation.
- Lack of City interest in improving the aesthetics of the surrounding area.

All of the above negative impacts will be greatly exaggerated by an additional 43 feet of garbage, plus the addition of a Transfer Station and the possible additional train traffic that may occur. And finally, the knowledge that the people of Sun Valley will NEVER be rid of the brand "dumping ground" for the City of Los Angeles.

Sincerely,



Sharon McEveaty  
10901 Elinda Place (corner of Peoria)  
Sun Valley, CA 91352  
818-504-2633

A. & S. Servera  
9168 Oneida Ave.  
Sun Valley, CA 91352

RECEIVED  
CITY OF LOS ANGELES  
April 17, 2003  
APR 16 2003

ENVIRONMENTAL  
UNIT

Dear Dept of City Planning / Jim Liao  
re: Bradley Landfill  
9227 Tujunga blv. Sun Valley,

My family and I are very much against anymore exposure of this dump. We especially hate the smell that fills our air, and the fact that it blocks the view of the mountains from San Fernando Road. We recently attended the community meeting, at Sun Valley Jr. High School, on this same subject. We were saddened that the children of surrounding schools, are coming down with illnesses such as asthma and nose bleeds.

Please do all you can for our neighbors and my family, to protect our health and environment.  
Thank you very much. Sincerely,  
A. & S. Servera

Jimmy Liao, Project Coordinator  
Bradley Landfill and Recycling Center Transition Master Plan  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca., 90012

RECEIVED  
CITY OF LOS ANGELES

APR 16 2003

ENVIRONMENTAL  
UNIT

Re: EIR NO.: ENV-2001-3267-EIR; SCH NO.: 2002121027

Mr. J. Liao,

As President of the Shadow Hills Property Owners Association, I am herewith forwarding to you concerns expressed to me by residents of the western area of Shadow Hills, the area that would be most effected by any changes to Waste Management's Bradley Landfill.

Concerns relating to the 43 foot height permit extension:

First is that of increased odor. Odor impacts do depend on a wide variety of factors including such things as emission rate, emission composition, meteorological conditions, etc. The American Society of Test and Materials has designed an odor dispersion model based on emission rates, meteorological conditions and distance from the source. Atmospheric turbulence is a process by which odors are dispersed – the greater the atmospheric turbulence, the greater the odor dispersion. In it's beginning, refuse at the Bradley Landfill was filling a hole. While there was unquestionably always a definite and unpleasant odor associated with the landfill at it's perimeter, dispersion was not a factor since atmospheric turbulence would little effect the contents of a hole. However, we are now being asked to accept an additional 53 feet of refuse atop the already 100 feet above ambient level. Just from this 100 foot mountain, atmospheric turbulence DOES disperse emitted odors which have reached totally unacceptable levels for residents living notable distances away from the source.

Secondly is that of the visual blight such a mountain would impose on residents of western Shadow Hills. They purchased their homes for the expansive view of the San Fernando Valley that came with those homes – not for a view of a mountain of garbage.

Concerns relating to the MRTF

Let's talk about noise. Recently Waste Management was trying out new generators to convert Methane into clean fuel for City cars. Nearby residents complained about the irritating noise levels and the generators were turned off. Fast-forward to the MRTF. At present, working hours are noted to be 6 am to 6 pm Mon thru Fri and 7 am to 3 pm on Sat.'s. The proposed working hours for the MRTF are noted to be 6 am to MIDNIGHT daily (Pg 3 Notice of Preparation of an EIR). Just imagine the noise and traffic associated with incoming trucks discharging contents to a tipping floor for waste consolidation and reloading via four loading wells, mechanical sorting and processing equipment – all running from 6 am to midnight topped off with the possibility of future installation of rail service for refuse transfer. For heavens sake, this is a hop-skip-and-a-jump from Shadow Hills, one of

the last remaining semi-rural environments within the boundaries of the City of Los Angeles, it is not the City of Industry.

Concerns regarding permit extensions

Bradley Landfill's existing permit allowed for operation until the year 2007 or a maximum height of 1010 ft above mean sea level, whichever came first. Waste Management is now requesting an extension of this permit to allow for an increase in the maximum height of the landfill to 1,053 feet above mean sea level or 2007, whichever comes first. What assurance do we have that once that 1,053 feet is attained we will not once again be asked to extend the permit?

Questions regarding employee job status

One of the major arguments presented by Waste Management is that all existing employees will retain jobs with the new MRTF facility. Are there only 50 persons presently employed by Waste Management? According to Pg 3 of the EIR Notice of Preparation, there will be only 50 employee parking spaces available.

General thoughts and comments

No one is opposed to the concept of a MRTF - it is a wonderful idea, it is just that such an operation with it's associated noise, traffic, odor, visual blight etc belongs in a more industrial portion of the city not in the direct viewshed of a resident who has purchased a home in a community touted to be environmentally conscious and semi-rural. From this more suitable industrially-based location, rail transfer can then utilize existing railways to transport refuse to a landfill located far from ANY existing or imminent residential area so that this same conflict between community and landfill operation may hopefully never happen again.

Thank you for your time and consideration,

Elektra Kruger, President  
Shadow Hills Property Owners Association

ELEKTRA KRUGER  
c/o SHPOA  
P.O. BOX 345  
SUNLAND, CA  
91041-0345





Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

Notice of Preparation

April 11, 2003

RECEIVED  
CITY OF LOS ANGELES

APR 16 2003

ENVIRONMENTAL  
UNIT

To: Reviewing Agencies

Re: Bradley Landfill and Recycling Center Transition Master Plan  
SCH# 2002121027

Attached for your review and comment is the Notice of Preparation (NOP) for the Bradley Landfill and Recycling Center Transition Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jimmy Liao  
Los Angeles City Planning Department  
200 N. Spring Street  
Suite 763  
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

for  Philip Crimmins

Scott Morgan  
Associate Planner, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2002121027  
**Project Title** Bradley Landfill and Recycling Center Transition Master Plan  
**Lead Agency** Los Angeles City Planning Department

**Type** NOP Notice of Preparation  
**Description** The proposed project consists of two phases. The first phase is a transitional 43 foot vertical landfill expansion that will provide additional short-term disposal capacity within the boundaries of the existing landfill. The second phase will consist of a 6,000-tpd-transfer station and 1,000 tpd Materials Recovery Facility (MRF) that will be constructed adjacent to the the existing landfill. The purpose of this plan is to provide for an orderly transition of Bradley Landfill and Recycling Center from an active landfill to a transfer station/Materials Recovery Facility.

**Lead Agency Contact**

**Name** Jimmy Liao  
**Agency** Los Angeles City Planning Department  
**Phone** 213/978 1331 **Fax** 213-978-1343  
**email**  
**Address** 200 N. Spring Street  
 Suite 763  
**City** Los Angeles **State** CA **Zip** 90012

**Project Location**

**County** Los Angeles  
**City**  
**Region**  
**Cross Streets** Glenoaks Blvd., Lankershim Blvd., Bradley Ave., Peoria Street  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** 5  
**Airports**  
**Railways** Metrolink  
**Waterways**  
**Schools**  
**Land Use** M3-1-G and M2-1-G

**Project Issues** Air Quality; Forest Land/Fire Hazard; Water Quality; Landuse; Noise; Traffic/Circulation

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Health Services; Department of Fish and Game, Region 5; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, District 7; California Highway Patrol; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; State Water Resources Control Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

**Date Received** 04/11/2003 **Start of Review** 04/11/2003 **End of Review** 05/12/2003

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

Resources Agency

Resources Agency  
Nadell Gayou

Dept. of Boating & Waterways  
Suzi Beizer

California Coastal Commission  
Elizabeth A. Fuchs

Dept. of Conservation  
Roseanne Taylor

Dept. of Forestry & Fire Protection  
Allen Robertson

Office of Historic Preservation  
Hans Keutzbarg

Dept. of Parks & Recreation  
B. Noah Tilghman  
Environmental Stewardship Section

Reclamation Board  
Lois Buford

S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam

Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Health & Welfare

Health & Welfare  
Wayne Hubbard  
Dept. of Health/Drinking Water

Food & Agriculture

Food & Agriculture  
Steve Shafter  
Dept. of Food and Agriculture

Fish and Game

Dept. of Fish & Game  
Scott Ficht  
Environmental Services Division

Dept. of Fish & Game 1  
Donald Koch  
Region 1

Dept. of Fish & Game 2  
Berkly Curtis  
Region 2

Dept. of Fish & Game 3  
Robert Fiorke  
Region 3

Dept. of Fish & Game 4  
William Laudermilk  
Region 4

Dept. of Fish & Game 5  
Don Chedwick  
Region 5, Habitat Conservation Program

Dept. of Fish & Game 6  
Gabrina Gaidtel  
Region 6, Habitat Conservation Program

Dept. of Fish & Game 6 UM  
Tammy Allen  
Region 6, Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Game M  
Tom Napoli  
Marine Region

Independent Commissions

California Energy Commission  
Environmental Office

Native American Heritage Comm.  
Debbie Treedway

Public Utilities Commission  
Ken Lewis

State Lands Commission  
Betty Silve

Governor's Office of Planning & Research  
State Clearinghouse Planner

County: LOS ANGELES

Colorado River Board  
Gerald R. Zimmerman

Tahoe Regional Planning Agency (TRPA)  
Lyn Barnett

Office of Emergency Services  
John Rowden, Manager

Delta Protection Commission  
Debby Eddy

Santa Monica Mountains Conservancy  
Paul Edelman

Dept. of Transportation

Dept. of Transportation 1  
Mike Eagan  
District 1

Dept. of Transportation 2  
Don Anderson  
District 2

Dept. of Transportation 3  
Jeff Pulverman  
District 3

Dept. of Transportation 4  
Tim Sable  
District 4

Dept. of Transportation 5  
David Murray  
District 5

Dept. of Transportation 6  
Marc Bimbaum  
District 6

Dept. of Transportation 7  
Stephen J. Buswell  
District 7

Dept. of Transportation 8  
Linda Gimnes,  
District 8

Dept. of Transportation 9  
Gayle Roseorder  
District 9

Dept. of Transportation 10  
Tom Dumas  
District 10

Dept. of Transportation 11  
Bill Figgie  
District 11

Dept. of Transportation 12  
Bob Joseph  
District 12

Business, Trans & Housing

Housing & Community Development  
Cathy Cresswell  
Housing Policy Division

Caltrans - Division of Aeronautics  
Sandy Heenard

California Highway Patrol  
Lt. Julie Page  
Office of Special Projects

Dept. of Transportation  
Ron Helgeson  
Caltrans - Planning

Dept. of General Services  
Robert Slippy  
Environmental Services Section

Air Resources Board  
Airport Projects  
Jim Lerner

Transportation Projects  
Kurt Karperos

Industrial Projects  
Mike Tolstoup

California Integrated Waste Management Board  
Sue Olney

State Water Resources Control Board  
Jim Hockenberry  
Division of Financial Assistance

SCH# 2002121027

State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

State Water Resources Control Board  
Mike Falkenstein  
Division of Water Rights

Dept. of Toxic Substances Control  
CEQA Tracking Center

Regional Water Quality Control Board (RWQCB)

RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

RWQCB 3  
Central Coast Region (3)

RWQCB 4  
Jonathan Bishop  
Los Angeles Region (4)

RWQCB 5S  
Central Valley Region (5)

RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

RWQCB 6  
Lahontan Region (6)

RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

RWQCB 7  
Colorado River Basin Region (7)

RWQCB 8  
Santa Ana Region (8)

RWQCB 9  
San Diego Region (9)

April 12, 2003

**RECEIVED**  
CITY OF LOS ANGELES

APR 15 2003

ENVIRONMENTAL  
UNIT

TO: Jimmy Liao,  
Project Coordinator, Bradley DUMP

FROM: Claire Dine  
8051 Hinds Avenue *ed*  
North Hollywood

Claire Dine  
8051 Hinds Ave.  
North Hollywood, CA 91605

Nice of you to ask for my comments about the Bradley Dump.  
~~I strongly object to Phase I, as you would also if the  
filthy monstrosity was in your neighborhood and your family  
had to contend with the toxic fumes and soot. You neglected  
to mention the nuclear waste that is deposited there.~~

When I dust my furniture or my car, fine black particles  
come off. When I moved here more than 50 years ago, the  
dust was not black. My breathing problems are surely  
related to this smoldering Dump and its continual army of  
polluting trucks. May the good Lord, if there is one, help  
all the children who breathe this foul air.

I object even more to Phase 2, the trash-processing  
abomination that would continue the toxic pollution until  
hell freezes over. You City Hall experts really know how to  
"dump" on the Northeast Valley.

You can count on me to attend your April 24th "Public  
SCOPING", whatever that is.

**RECEIVED**  
CITY OF LOS ANGELES

APR 15 2003

ENVIRONMENTAL  
UNIT

April 10, 2003

From  
Michael Trerotola  
535 West 135<sup>th</sup> Street  
Gardena Calif. 90248

To:  
Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Spring Street, Suite 763  
Los Angeles, CA 90012

Re:  
ENV - 2001-3267-EIR SCH # 2002121027

Gentlemen:  
I own a residential condominium at 11107 Arminta Street, Unit #12 in Sun Valley.

I strongly object to the above proposal for the following reasons.

1. The possible negative impact to Ground Water Quality caused by dumping of hazardous materials so close to residential areas.
2. The negative impact to aesthetics will have a negative impact to property values particularly if allowed to rise above ground level.
3. The increase noise and possible negative impact to air quality caused by vehicular traffic of autos and large trucks entering and exiting the site.

In my opinion, this is a very bad proposal which if allowed, may cause serious health problems to nearby residents.

I urge a NO! Vote to this proposed project.



Michael Trerotola



# South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>



RECEIVED  
CITY OF LOS ANGELES

APR 14 2003

ENVIRONMENTAL  
UNIT

April 11, 2003

Mr. Jimmy Liao, Project Coordinator  
Los Angeles Dept. of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Mr. Liao:

## **Notice of Preparation of a Draft Environmental Impact Report for Bradley Landfill and Recycling Center Transition Master Plan**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR).

### **Air Quality Analysis**

The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be considered. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the evaluation. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mr. Jimmy Liao

-2-

April 11, 2003

**Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, AQMD's Rule 403 - Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

**Data Sources**

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. ~~Much of the information available through the~~ Public Information Center is also available via the AQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The AQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Dr. Charles Blankson, Transportation Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



for Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:li

LAC30410-03LI  
Control Number

Apr 11 03 08:31a

818-504-2458

P. 1

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CITY OF LOS ANGELES

APR 11 2003

ENVIRONMENTAL  
UNIT**April 11, 2003**

**Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012**

**Dear Sir:**

**I have been in business in this area for 15 years plus. I am very strongly against the expansion of the Bradley Landfill Project.**

**We have smelled this landfill for too many years and at times we believe it has made some people sick. Please put our vote in as a NO for this expansion.**

**Sincerely,***Bata Mataja***Bata Mataja****Owner**





# TEAMSTERS LOCAL UNION NO. 396

## Package and General Utility Drivers

May 29, 2003

### Executive Board

**Ros Herrera**  
Secretary-Treasurer

**Bill Huff**  
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Vice-President

**Jay Phillips**  
Recording Secretary

**Rafael Camacho**  
Trustee

**John Campa**  
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**Rey Garcia**  
Trustee

Jimmy Liao, Project Coordinator  
Environmental Review Section  
Planning Department  
City of Los Angeles  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

**MAY 30 2003**

**ENVIRONMENTAL  
UNIT**

Dear Mr. Liao:

On behalf of Teamsters Local 396, I wish to express my strong and unwavering support for Waste Management's Transition Master Plan for the Bradley Landfill and Recycling Center in Sun Valley. I urge you to measure the substantial economic contribution this facility has on the lives of working families in the Northeast San Fernando Valley communities of the City of Los Angeles when assessing the environmental impacts of this project. Local 396 represents over 10,000 members, including many of the men and women working at the Bradley Center. Waste Management has a long history of running a clean and safe facility, being a good corporate citizen, and supporting organized labor. My understanding is that the transition to transfer and recycling operations is directly connected to the extension of landfill operations until April 2007. If this extension is not granted, Waste Management will be forced to close the Bradley Facility and over 200 good paying jobs will be lost. This simply cannot happen.

The Transition Master Plan will permanently close the landfill portion of the facility by April 2007. It will bring a clean, state of the art transfer facility and recycling center to the Northeast San Fernando Valley, which will reduce long haul traffic and protect the environment by reducing emissions. But, most important, it will ensure that the 200 plus workers at the Bradley site will have good paying jobs well into the future. This latter benefit is of prime concern to my membership as 80% of the workers at the facility live in the Northeast Valley, an area long plagued with high rates of both unemployment and poverty.

Waste Management is a good corporate neighbor. Bradley workers clean the streets with street sweepers, clean up graffiti and litter, and make sure the site is watered down to control dust and odors. Waste Management even gives generous donations that support local

880 Oak Park Road • Suite 200 - Covina, California 91724

Phone (626) 915-3636 • (877) 785-8396 • Fax (626) 915-3635 • E-mail: L396TEAM@aol.com

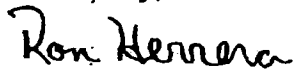


charities. Each year the company injects more than \$10 million directly into the area's economy -- over \$4 million of that in payroll. Waste Management also pays over \$1 million in taxes and fees that go directly into the City's general fund. Bradley's contributions to the local economy are significant. The City of Los Angeles simply cannot afford to loose this kind of employer.

***Teamsters Local 396 wholeheartedly supports the Transition Master Plan for the Bradley Landfill and Recycling Center.*** This is an issue of paramount importance to workers in the City of Los Angeles and the Northeast San Fernando Valley. Anything short of full approval of this plan will have a tragically negative effect on working people and their families during these very tough economic times.

On behalf of Teamsters Local 396, I urge you to take into consideration the tremendous contributions the Bradley Landfill and Recycling Center has upon the quality of Life of the Northeast San Fernando Valley when evaluating the potential impacts of this proposal.

Sincerely,



Ron Herrera  
International Brotherhood of Teamsters  
Local 396

From: "Despres, Cynthia A." <Cynthia.Despres@unistudios.com>  
 To: "jliao@planning.lacity.org" <jliao@planning.laci...>  
 Date: Fri, May 23, 2003 5:14 PM  
 Subject: FW: Public Comment Re: Bradley Landfill ENV-2001-3267-EIR

> ---Original Message---

> From: Despres, Cynthia A.  
 > Sent: Friday, May 23, 2003 4:55 PM  
 > To: 'jliao@planning.lacity.org'; 'ripley50@hotmail.com'  
 > Cc: 'cannz@earthlink.net'; 'senatorlorcon@sen.ga.gov'; 'Cenglehardt@aqmd.gov';  
 'gary.washburn@asm.ca.gov'; 'jburkhardt@mayor.lacity.org'; 'wgruel@lacity.org';  
 'senatorlarcon@sen.ca.gov'; 'maria.ammmoudian@sen.ca.gov'; 'galanter@council.lacity.org';  
 'apadilla@council.lacity.org'  
 > Subject: Public Comment Re: Bradley Landfill ENV-2001-3267-EIR

> May 23, 2003

> Jimmy, Project Coordinator  
 > Los Angeles Department of City Planning  
 > 200 N. Spring St., Room 763  
 > Los Angeles, CA 90012  
 > FAX 213-978-1343

> Bradley Landfill, EIR No.: ENV-2001-3267-EIR SCH NO.:2002121027  
 > RE: April 24, 2003 Public Scoping Mtg.

> To Those Concerned:

> We are strongly objecting to Phase I of the proposed plan to increase the height of Bradley Landfill from 1010 ft. to 1.053 ft. above mean sea level. This expansion will bring an additional 4.7 million cubic yds. of trash into our community and allow the landfill to operate until April, 2007. We have been dumped on far too long already!

> We are also strongly opposed to the Phase II proposed Plan of a transfer station to transfer 6,000 tons of trash per day as well as the Materials Recovery Facility (MRF) that would process 1,000 tons of trash a day. We are opposed to both Phases for the following reasons:

> \* Significant cumulative impact to our community

> Our community is already overburdened with landfills and other industrial waste sites. There would be no environmental justice if deep consideration is not given to the cumulative impact to our health, well being, and quality of life.

> We would like to point out the AQMD established in Oct. of 1997 an Enhanced Environmental Justice Work Plan that the AQMD Governing Board defines as "the equitable environmental policy making and enforcement to protect the health of all persons who live or work in the AQMD, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution." No more dumping in Sun Valley! This is already an over stressed environment.

> The City Planning Dept. has demonstrated an irresponsible issuance of permits in the area creating significant cumulative impact of pollution and degradation of the area.

> \* Air Quality - trash and increased traffic from trucks and trains,

> 1. What studies have occurred or are planned linking particle pollution to our community school absences, rates of asthma, hospital admissions, shortened life spans, reduced lung function, heart disease and cancer?

- > 2. How will the community residents be adequately informed of the pollutants released by fire retardant chemicals that saturate an ever increasing quantity of garbage? How will you be testing for this? What future plans are slated to continue testing for this on a regular basis?
- > 3. The STINK. Simply stated, we're all sick of the stink!
- > 4. Currently, we should have permanent air quality monitors in place with the results available 24 hrs. day to the residents of this community.
- >
- > \* Radioactivity/Gas
- > 1. The only radioactivity levels that we are told about are leachate levels.
- > Which traces gasses will you study? How will you test and inform the public about baseline levels of Beta, Alpha, and Gamma levels? Over time, what are the plans for continued testing? How will the community residents be adequately informed of the mitigation measures and health risks?
- >
- > 2. We are concerned about the contamination of our pool water and the fruit and vegetables in our yard from the trace chemicals from methane gas that may migrate into our community. What kind of studies will you be conducting to prove to address these concerns?
- >
- > 3. We are concerned about the accuracy of the radioactive monitors currently in place. Can these be turned off by Waste Management? If so, what other safeguards are in place?>
- >
- > \* Buffer Zone
- > Why is a 50 ft. buffer zone between Bradley Landfill and residential properties considered safe? Why is a buffer zone between 200 - 500 ft. required at the majority of other landfills?
- > Since methane gas can travel in a subsurface migration, how is the safety of the nearby residents guaranteed?
- >
- > \* Impact to Water
- > During large storms with resulting erosion damage, how would our exposure to the uncovering of waste be prevented? The higher the trash mountain, the more susceptible to erosion. Why would we risk polluting an increasingly valuable resource such as our water supply?
- >
- >
- > \* Aesthetic Impact/Property Values
- > We live in Shadow Hills, approx. 2 miles from Bradley Landfill, and just within the last couple of years we have watched the dump creeping upward into a large hill. This garbage heap was not evident from our home when we purchased it 6 years ago. If the mound of trash is allowed to become a mountain of 1053 feet, this will indefinitely become the most prominent feature of the community. This will become a disclosure issue and negatively impact the value of our property. This garbage mountain will forever alter the natural landscape and quality of life of my neighbors and family.
- >
- > \* Community Pride
- > What mitigation measures are planned to compensate our community for a negative reputation based on the stench and visual blight of a trash mountain?
- > Undeniably, there is nothing worse that could happen to a community than the issuance of a permit to allow a trash mountain in the middle of that community.
- > This would be our landmark. This, is not environmental justice!
- >
- > \* Bad Neighbor
- > Waste Management is a bad neighbor. They have offered up no mitigation measures, they have given nothing back to the community they have pillaged for years. They repeatedly violate terms of their current permit (see the quantity of complaints to the Air Quality Board regarding the stench). Often we see them operating many hours later than their permitted operating hours.
- >
- > \* Closure
- > 1. We have been informed that as part of the closure procedures, vegetation would be planted over a 4 ft. cap. How will you support the growth of trees with only a 4 ft. cap? Much more is needed and should

be included in preliminary closure plans.

>

> 2. What are the Environmental agencies plans if the cap gets breached 50 yrs. down the road?

>

> 3. What recent studies have been conducted to determine the cost to cover the damage from leakage (leachate) when the liner breaks? It will break.

> How will our community be protected from having to shoulder the financial burden should the funds set up by Waste Management prove to be insufficient? This has happened to other communities.

>

> \* Conclusion

> We strongly believe any expansion to Bradley Landfill's current operating plan will have significant negative impacts on our health, well being, property values and quality of life. While we understand the need to process the ever increasing garbage of Southern California, we appeal to our lawmakers to give full consideration to our concerns.

>

> Sincerely,

> Thomas and Cynthia Despres

> 10340 Valley Glow Drive

> Shadow Hills, CA 91040

> (818) 352-3695

>

>

From: "Cathleen Doyle" <savethehorse@earthlink.net>  
To: <jliao@planning.lacity.org>  
Date: Tue, May 27, 2003 1:18 PM  
Subject: FW: <no subject>

Previous e-mail address was incorrect and returned undeliverable

From: "Cathleen Doyle" <savethehorse@earthlink.net>  
To: jliao@planning.lacity.org  
Subject: <no subject>  
Date: Sat, May 24, 2003, 6:44 PM

May 23, 2003

Jimmy Liaos, Project Coordinator  
Department of City Planning  
200 N. Spring Street - Suite 763  
Los Angeles, California 90012

RE: Bradley Landfill ENV-2001-3267-EIR SCH NO. 200112127

Dear Mr. Liaos:

I would like to voice my concerns regarding the above application.

Pollution, land values, aesthetics, and cancer aside, I would like to address the issues of human health and quality of life regarding noise levels coming from Bradley.

I live directly adjacent to Bradley. After Bradley completed the five generators for PG&E and became operational, their own noise specialists registered their decibel levels at 50. My understanding is that 40 decibels is legal. And it is also my understanding that every three decibels "doubles" the noise level. Bradley has and is continuing to mitigate this horrible problem. As of their last reading by their own specialists, the decibel reading was still at 45 which is unacceptable. Particularly since this is not short, intermittent bursts of noise, rather continuous. I understand there have been discussions for stopping the generators at midnight. Well, what is the long term prognosis for damage to one's hearing let alone physical and emotional health after being subjected to illegal/unhealthy noise levels eight, ten or fifteen hours a day, seven days a week? Have the studies been done on this?

Now, the City is considering adding trains to these noise levels? We have the noise from the train every night around 11 PM. Will this be compounded by more trains and more noise at night?

I was recently informed that American Waste Industries supposedly has permits to operate until 2PM? If this is so, what committee or commission is responsible and are the permits recent? American Waste periodically wakes me up at all hours of the night and early morning with their machines. Bradley's noise specialists clocked American Waste Industries noise at 48-52 decibels from my property one night around midnight after taking a reading of their own noise.

So, combine the 45 decibels from Bradley with the 52 decibels from American Waste, plus whatever noise Sun Valley Paper is generating, and then add to that more trains coming into the area and stopping during the night. Individually each of these noise levels is over 40 decibels which is illegal. Cumulative decibel levels and the subsequent damage from constant, long-term exposure is 'unknown'. This is what an EIR is for, to take the time to research and mitigate BEFORE permits are issued.

There has been little to no attention given to noise pollution. It is a health, quality of life and property value issue.

Thank you for your valued time and attention to this matter.

Cathleen Doyle  
11350 Allegheny Street  
Sun Valley, California 91352

From: <SusanSvg@aol.com>  
To: <Jliao@planning.lacity.org>  
Date: Wed, May 28, 2003 7:10 PM  
Subject: Bradley Concerns

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Room 763  
Los Angeles, CA 90012  
FAX 213-978-1343

Bradley Landfill, EIR No.: ENV-2001-3267-EIR\* SCH NO.: 2002121027  
RE: April 24, 2003 Public Scoping Mtg.

Dear Mr. Liao:

In response to community questions/concerns solicited concerning the Bradley Landfill expansion, please consider the following:

- 1) How is my health being protected today and tomorrow with regard to the settling of the waste, further dumping, etc.
- 2) I often ride my bicycle in that area because of the convenient bike routes, how is the stink going to be mitigated as well as the dust and toxicity associated? I rarely see other bicyclists on the routes around the landfill and I can only assume (because of experience) that they do not take these routes due to the stench and fear of the toxicity because I often question it myself and prefer other routes to Sun Valley.
- 3) Spending a significant amount of time in the area, I have noticed a great amount of blight in the regions around the landfill. How do you plan on improving this situation?
- 4) How do you plan on improving the circumstances for the property and business owners who have already come under health and economic hardships due to the landfill's existence?

I am amazed that the landfill has been as developed as far as it is currently. This community has wonderful potential and expansion of the Bradley Landfill would only deteriorate a region where there should be much greater prosperity.

Support of such an expansion where children's health is concerned would have to prove that it has now and never will have ANY impact EVER on the neighborhood families.

Thank you,  
Sue Savage  
10911 Bloomfield St., #1  
North Hollywood, CA 91602

CC: <cynthia.despres@unistudios.com>



To whom it may concern;

I Veronica Aldrete do not agree with making another solid waste disposal and recycling center. I do not think that the area in which you are planning to build this waste disposal and recycling center is appropriate. There are families with many children living around this area and I believe it is not healthy for them to be around such waste.

Instead of building a waste and recycling center you should build something that would benefit the community, such as building another recreational center, Gym, or Library.  
Thank you for your time.

Teana Borbon  
 11110 LORNE ST Sun Valley CA 91352

To whom it may concern, I am  
 a resident to the location you are  
 considering making a trash holding  
 facility and I Teana Borbon  
 disagree with the circumstances. ~~location~~

The reason being because there is  
 enough trash around the neighborhood  
 being you can't control that. What  
 would make the residence of this  
 particular neighborhood feel that it  
 would be under control.

I don't think you provide  
 enough explanation why you should do  
 this! and what ~~is~~ would we benefit  
 from? except a nasty smell and  
 probably a lot of health risks  
 involved.

Being I said what I  
 feel, I ~~do not~~ disagree to the  
 fullest!  
 Teana Borbon

ATT Jimmy Liao

mi nombre es Maria Jacquez

Y no estoy de acuerdo que agoran  
mas basureros aqui en la area  
de San Fernando pienso que los  
habian de poner en otra area

por ejemplo en berberly Hills

ay dicen que viven los ricos  
ellos si tienen dinero para

atenderse cuando se enferman  
por que entre 2 y 3 de la mañan  
ra como huelen feo toda el area

se pacoima Sun Valley y North Hollywood  
djala que por primera ves escu  
ben a los pobres Gracias

Maria Jacquez

ATT Jimmy Liao

RE: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT:

First of all I want to start off by introducing myself, my name is Cristina Montes de Oca and I will be representing part of my community. Furthermore, I have been at my residence for more than 20 years and take great pride in my city as many others do. I've coached at the local Park for 5 yrs. and would hate to see our city go to ruins. Residents of Sun Valley know this place as a place to be with your family. We came to Sun Valley with hopes and dreams where we would raise our children to play sports such as Baseball, Football, Soccer, ~~and~~ Softball and have them believe that they too could become Professional Athletes one day. But, it seems to us that those dreams are somehow fading away.

By ~~expanding~~ <sup>big</sup> your dump <sup>make it impersonal. sounds like a personal attack.</sup> in our ~~community~~ <sup>the dump!</sup> City you will be affecting the health of many residents as you already do. While the residents of Sun Valley sleep BRC is busy burning trash thinking that no one can smell, but you know what? we can. Now is the time ~~for us to rise and let you know that ENOUGH IS ENOUGH.~~ <sup>we can</sup> ~~and~~ take your trash elsewhere. <sup>we</sup> we plan to raise our kids in a children

(A)

(B)

(C)

safe and healthy environment. In a place where we don't have to worry about what kind of air our kids are breathing and so many other environmental impacts.

Thank you,

Cristina Montenegro

I would like

Estamos completamente seguros en esta comunidad que si sus hijos pertenecieran a los deportes de aquí Sun Valley lo pensarían hasta con una serie de detalles pero ustedes pueden también pueden pensar este basurero de contaminación ambiental y respiratoria por que saben que los olores que despide un basurero son dañinos para un desarrollo infantil. Estamos rodeados de muchas cosas negativas pero no vamos a cruzarnos de brazos esperando que ustedes - ~~Afecten~~ Este parque ~~que~~ ~~esta~~ ~~ubicado~~ ~~a~~ ~~los~~ ~~niños~~ nos pongan un basurero y más yonkes

Maria Mendez

10

unite

11566 Strather St North Hollywood  
CA Tel 818-255-3785

Año Yo Miguel Mendez

No quiero mas business aqui  
my hijo esta ya muy enfermo por  
que aqui ha estado quemando.  
Hoy en todos los dias vuel  
a animal muerto

gracias

Miguel Mendez

11520 S Thacker St

North Hollywood

Letter

Attn. Jimmy Liao

My name is Maria Jacquez and I do not agree with having more landfills in this area. I think you can build them in other area such as Beverly Hills. People say that rich people live there. They have money to go to the doctor when they get sick, for we have to bare the odors between 2 a.m. and 3 a.m. The whole area of Pacoima, Sun Valley and North Hollywood bare the bad odors (coming from the landfill). I hope that for the first time you listen to the poor. Than you

Maria Jacquez

Letter

I Miguel Mendez do not want more landfills here. My son is very sick because they are burning trash every day (and) smells as if dead animals were there. Than you.

Miguel Mendez  
11566 Strather Street  
North Hollywood

Letter

I would like...

In this community we are completely sure that (if) your children (were involved) in sports here in Sun Valley, you would think (about it) very carefully. You would (also) think carefully that landfill (activities) pollute the environmental (and is the cause of) respiratory (problems) because you know that the odors from the landfill are harmful for the development of children. We are surrounded by many negative things, but we are not going to wait passively for you to place a landfill and other junk (in our area).

Maria Mendez  
11566 Strather Street  
North Hollywood, Ca  
Phone  
818-255-3785

ATT Jimmy Liao

I Cynthia Montes de Oca,  
disagree on putting a recycling center  
Transition Master Plan, at night it smells  
real bad ~~of~~ burned trash and I have a  
son and I wouldn't want him to get sick,  
he is only 5 m old. If he gets sick who  
is going to pay for his doctor visit? Me.  
So that's why I disagree on it. Besides  
it will look really ugly and it will always  
be stinky. Everybody around the  
recycling center, will end up leaving  
their homes. We are a community  
and we don't want to see that happen.

Cynthia Montes de Oca  
1150 Lorne St  
Sun Valley CA 91352



May 22, 2003

Mr. Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Ste. 763  
Los Angeles, CA 90012

Dear Mr. Liao,

My family and I have lived at 8700 Norris Ave., Sun Valley, 91352 since 1995. Never did we think about the problem we are facing now, when we purchased our home. I address you in this letter in ~~regards to the Environmental Impact Report your department is preparing for Waste Management's~~ (WM) proposal to expand the mountain of trash at Bradley Landfill 43 ft. higher and to permanently install a trash transfer station and recycling type of facility at Bradley (ENV - 2001 - 3267 - EIR: SCH NO: 202121027). I would like for you to direct your department to answer the following questions in this EIR, which stem from great concern and opposition to these projects.

#### Aesthetics

The current mountain of trash stands at 1,000 ft. high and is an eye sore. A 43ft. expansion would exacerbate this aesthetic nuisance. How does WM or the City plan to alleviate this visual blight? Are there any trees planted at the foot of this mountain to help mitigate this sight? Also, if there's going to be more trash coming into Bradley, that means more trash on our streets which already look like they're part of the dump because they're lined with trash. The trash gets there because it flies off of the trash trucks on their way to Bradley. How does WM control trash from flying away from its property and on to public streets? How does WM control trash from flying off its trucks? Does WM offer incentives to trash hauling contractors who are environmentally conscious and practice such precautions? How often does the City clean and sweep the streets that are most often used as routes to and from Bradley within a 3-mile radius? Please conduct a study to see which are the streets most often used on a daily basis by independent trash hauling trucks and WM trucks to get to and from Bradley landfill. How often have those streets been repaved in the past? How many trees will be planted on those streets to help improve aesthetics and air quality? Please include the negative ~~cumulative impacts that would include a transfer station, material recovery facility, and a 43 ft. trash~~ expansion. Please study how much trash ends up on these frequently used routes within a 3-mile radius of Bradley, and how often these routes currently get cleaned and swept by the City. How much more trash would end up on those streets as a result of the trash hauling trucks going to and from Bradley?

#### Air Quality

What is currently being used as a daily cover for trash on a daily basis? What was used before? What gases and smells permeate into the air? How do they negatively affect air quality? How has bad air quality negatively affected the Sun Valley community in the past 10 years? How will this project exacerbate the bad air quality and the negative effects of bad air? If the mountain of trash gets higher, how much farther into neighboring Sun Valley communities will the wind be able carry the bad air? In what direction and how far is the polluted air that permeates from the landfill being carried now? What are the cumulative impacts on air quality from the mountain of trash? How is air quality

negatively affected by the diesel fuel exhaust of the diesel burning trash trucks that currently travel to and from Bradley? How much will traffic increase because of the proposed project? Due to several other gravel, trash transfer stations, and manufacturing businesses in the area, Sun Valley residents already put with the noise and industrial truck traffic. Based on this please consider the cumulative impacts on traffic. Please study the total amount of trips that trash trucks will be taking to and from Bradley, find out what the amount of diesel exhaust being emitted into the air is, and what the amount diesel exhaust is combined with other industrial trucks that commute throughout a 3 mile radius of Bradley. Please consider all cumulative impacts. How does the diesel exhaust negatively affect air quality in Sun Valley? How does diesel exhaust in the air negatively affect people who suffer from asthma, allergies, and weak heart? Does WM provide incentives or give preference to doing business with trash hauling truck companies that have natural burning gas fleets?

### Hazards and Hazardous Materials

~~For 10 years low levels of radioactive materials were dumped at Bradley without the knowledge of~~ local officials or regulatory agencies. What is the total tonnage of radioactive waste material that was dumped at Bradley? What is the level of radioactivity of this combined material combined? Sludge that drips from the trucks full of trash end up in street gutters that are then washed into the storm drain when it rains. This contaminates the L.A River and our ocean. Please consider this a cumulative impact. Furthermore, in phase I of the plan, it is mentioned that the "landfill will continue to use existing facilities and environmental controls." WM has a track record of violating State Minimum Standards when it comes to Methane Gas controls. How can existing environmental controls be effective with an additional 4.7 million cubic yards of disposal capacity if it is not effective today? Are there any plans of upgrading the environmental controls in order to handle the increase in trash within the next year?

### Hydrology/Water Quality

How thick is the liner of landfill? How many tons of trash are already compacted in the landfill? What does 43ft. of trash equal in tons? How will adding these additional tons affect the liner? Will this increase in tonnage make the liner break? Is there any guarantee that the liner has not broken already and that there is leachate leaking into the underground water basin? I believe the Regional Water Quality Board is conducting a study to find that out. Please consider their findings in this EIR and include as cumulative impacts.

### Land Use / Planning

How long will the trash sit in the transfer station before it gets hauled away? How will WM control pest (rats, insects, cats) problems at the transfer and material recovery stations? What type of infrastructure will house the transfer station and the material recovery facility? Will these new buildings have air filters that filter the air inside the building and filter the air exiting the building? What kind of a ventilation system will be installed at the two centers? Will both buildings have storm water catch basins and water infiltration systems to avoid ground water contamination? What type of system will be used? In phase II of the proposed project it mentions that all roads that lead to the transfer station will be paved for trucks to enter and exit the centers. How many times a day will those streets be watered down to reduce dust? How many trees will line those streets? Finally, the transfer station and the material recovery facility are supposed to replace Bradley Landfill and Recycling Center. This center takes in 10000 tons of trash a day, but the transfer station and the material recovery facility are proposed to only take in a combined 7000 tons of trash a day. What is WM's plan

to reduce the center's trash intake? Will this plan have any effects on the Sun Valley community and neighboring communities?

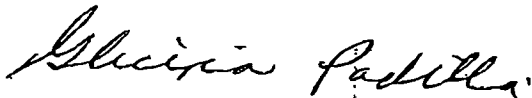
**Transportation/Traffic**

Trash and hauling trucks getting off the 5Fwy at Penrose St. cause traffic jams Bradley St. and Penrose St. Penrose is a major thoroughfare to get to an adjacent residential neighborhood, shopping center, and super market. In addition, the Fire Fighters at the Station on Glenoaks and Penrose use this street; these traffic jams can cost someone their life in the case of an emergency. Please consider this as a cumulative impact in your traffic survey studies. In addition, please study how many trucks will be going in and out of Bradley landfill on a daily basis during operating hours and how this traffic will affect residences and local businesses? How many of those are WM trash trucks and how many are 18 wheelers/flatbeds? How will this traffic affect traffic from residential areas, shopping areas, business and commercial areas, and health care facilities nearby?

---

I hope that you will consider all the questions my family and I have come up with to be answered in this EIR. This is a huge project and we've considered many things. We hope that through this study the City will realize that this is not a positive project and that it only degrades the quality of life of a hardworking community. Thank you for your time and consideration.

Sincerely,



Gliceria Padilla  
8700 Norris Ave.  
Sun Valley, CA 91352

HABTE-WOLD KASSA  
12038 RATNER STREET  
NORTH HOLLYWOOD, CA 91605

May 20, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, Ca 90012

**RECEIVED**  
MAY 29 2003  
CITY PLANNING  
DIVISION OF LAND

**Re: Notice of Preparation of an EIR and Notice of Public Scoping Meeting, Bradley Landfill and Recycling Center Transition Master Plan, ENV-2001-3267-EIR; SCH NO. 2002121027**

Dear Ms Liao,

In response to the above captioned notice and invitation for comments, I hereby provide the following in opposition to both Phase I and Phase II of the project.

The City of Los Angeles has an obligation and higher duty to protect the safety and health of its residents. Any permit request should be reviewed in favor of giving residents a safe and clean environment. Due to years of increasing emissions and industrial waste, Los Angeles has become too unhealthy. It is time to remedy the damage and cleanup the environment rather than add to the contamination and health hazards we have already been exposed.

I am opposed to the granting of the permit because:

1. Landfills pose health hazards for residents in general and pregnant women and children in particular.
2. Residents in the landfill area have already been exposed to dangerous conditions, extending the landfill and creating a transfer station will aggravate the condition.
3. The transfer station is premature and an indirect way of creating another landfill. In the absence of a concrete approved plan, site and transportation means for hauling waste, the transfer station should not even be considered at this time.
4. The air quality will be seriously impacted.
5. Noise, traffic and service system will be affected.
6. Aesthetics will be affected.
7. The value of our property will diminish.

8. The city is granting residential permits in the surrounding areas, while at the same time it is planning to grant the landfill's request. This is not consistent with the city's duty to the majority of its citizens.
9. The valley community has been dangerously exposed to several landfill and waste disposal facilities. Rather than searching for other remote locations or better technology to handle waste, the valley community is being unfairly condemned to more waste disposal and landfill extensions.

I would like to ask the city to address and answer the following questions in a satisfactory manner before deciding to grant the extension request:

- a. The radioactive airborne particulate released by the landfill and the health hazards associated with exposure.
- b. The health hazards of landfill gas and leachate.
- c. Working and properly monitored and verifiable emission monitors.
- d. Mitigations for the damage already done and what can be done to prevent continued health hazards due to the landfills past, present and future operation.

I would like the city to take a long and hard look into this extension, considering the health and well being of the community at large is at stake.

Truly,

  
Habte-Wold Kassa

cc: State Senator Gloria Romero  
State Senator Richard Alarcon  
State Assemblyman Keith Richman, M.D.  
State Assembly Member Cindy Montanez  
Honorable Mayor James Hahn  
Council President Alex Padilla  
Councilperson Ruth Galanter  
Councilperson Wendy Gruel  
Councilman-elect Tony Cardenas  
South Coast Air Quality Management District  
Con Howe, Director, City of Los Angeles Planning Department  
Jerry Piro, East Valley Coalition

May 23, 2003

RECEIVED  
CITY OF LOS ANGELES

MAY 29 2003

ENVIRONMENTAL  
UNIT

Jimmy Liaos, Project Coordinator  
Department of City Planning  
200 N. Spring St., Suite 763  
Los Angeles, CA 90012

**Bradley Landfill, ENV-2001-3267-EIR SCH NO 2001121027**  
**Notice of Preparation**

Dear Mr. Liaos:

The East Valley Coalition (EVC) a local citizens action group committed to changing the environment of our community to a healthy, beautiful place to live and raise our children. We represent a disenfranchised community with a predominantly low-income and Latino population. The specific purpose of the EVC is to engage in educational, scientific, and charitable pursuits to protect, defend and/or restore the natural and historic heritage of the Sun Valley area, preserve its watershed lands, and create a community which reflects these values through innovative planning and sound stewardship. The EVC offers the following comments on the Notice of Preparation for the proposed Environmental Impact Report (EIR) for the City of Los Angeles. *The proposed project is for an expansion of activities and intensity of use for an existing recycling facility and a variance to allow a refuse transfer station not permitted by right in an M2 zone. New construction will consist of a canopy at the back of the property.*

The EVC is opposed to the 43-foot expansion and municipal recycling facility (MRF) at the Bradley Landfill and variance for a refuse transfer station. This community was promised that the landfill would close and that impacts associated with landfill would be mitigated. Impacts have not been mitigated and the landfill that was originally simply bringing a gravel-pit to ground level has arisen as a 100-foot mountain. An expansion of recycling facilities and a transfer station variance continues to mark Sun Valley's image as the waste facility capital of Los Angeles. There are already a number of MRFs and transfer facilities in Sun Valley. The rest of Los Angeles will need to site their own waste facilities.

As a result of the CEQA history of Bradley Landfill, the EVC remains justifiably suspicious of Waste Management (WM) as well as the City Planning Dept. An attempted scoping meeting on Dec. 12 was deceptive by both WM and the Planning Dept. That day, the Planning Dept. and WM scheduled a scoping meeting at the Sun Valley Recreation Center to present the proposed project. Neither the City's Planning staff or WM conducted proper notification to the community. Concerned residents who attended this meeting were alerted through a phone chain two days prior to the meeting; local elected officials and the mayor's heard through a 'leak.' Since the City did not conduct proper notification for this very important meeting, vocal community members and elected officials, particularly Assemblywoman Cindy Montanez, demanded that the meeting be canceled and rescheduled following notification to residents within a 2 mile radius of the

dump.

Following that fiasco, the City sent notification to 31,000 addresses. Unfortunately, many people received multiple notifications (some as many as eight) so the real number of notified people is not known. Some people were still not notified at all. The amount of wasted paper was enormous. We recommend that the City or WM take the time now to check the list and eliminate redundancies and ensure that all residents within the prescribed area of 2 miles are properly notified.

In spite of the problems with the notification, the EVC appreciates the initial effort made by the City to notify our community. We hope that for the EIR comment period, these problems will be eliminated.

However, a last minute crisis emerged as a concerned community member faxed comments to the Planning Dept. on May 22, 2003 then followed up with a phone call to ensure the comments were received. Jimmy Liao, LA City Planning Dept., told her that the fax machine was out of ink and that he did not know when the new ink cartridge would arrive. Meanwhile, the City may not have received comments from community members who faxed in comments earlier in the week. Mr. Liao did not know if the ordered cartridge would arrive in time for final comments on May 23. The EVC was informed that this situation was "beyond his control." But if "people faxed in their comments today and tomorrow, they would be stored in memory for printing out on Tuesday." However, since the comment period ended just before a 3-day weekend there is again no assurance that all comments would be stored and retrieved. There is also no way to find out who sent in comments or let others know to send their comments to an alternative fax number the day before comments are due.

We restate our suspicions of the Planning Dept. How many more times will staff at the Planning Dept. demonstrate their ineptness during the CEQA process to the detriment of Sun Valley residents?

The EVC would also like to question the fortuitous new rail haul line currently under construction and parallel to the site designated as a transfer station at the Bradley site. We wonder why the Southern California Regional Rail Authority (SCRRA) does not use the gentler topography south of Sunland and north of the city of Burbank. Instead SCRRA chooses to inconvenience our community by closing Sheldon and Penrose Streets for construction of 'at grade' crossings at overpasses. The EVC would like assurance that this "public safety project" will not be used as a spur for trash rail haul from a private waste facility site in the future.

#### **Comment period**

The EVC is requesting at least a 120-day comment period for this significant document. Sun Valley residents are learning to comment on documents resulting from CEQA requirements but have yet to see an EIR due to WM and the Planning Dept.'s propensity to issue MNDs on Sun Valley projects. One hundred and twenty days will give the community the opportunity to discuss the issues and explore the accompanying technical documents in a more thoughtful, thorough fashion.

#### **No topical responses to comments**

18A-213-370-1343 May 30 2003 11:35 P. 18

We are aware that the project proponent and consultants answer comments submitted during the EIR process. However, the City is responsible for the content of this document. The EVC is not interested in topical responses that pretend to answer comments but don't really. Project proponents use topical answers as a way to evade the real answers to questions that are inconvenient. Every answer needs to address the subtlety of each question, not simply lump a number of questions together. Topical answers are a sham and should not be allowed.

**Clearly, concisely inform without burying**

The ECV is aware that EIRs should not be encyclopedic in their scope (Sections 15006(o) and 15142 and that information should be presented in plain language (Sections 15006(q) and 15140). Therefore we expect a document that clearly and concisely informs without "burying" the reader in information, a common tactic with project proponents that wish to reduce comments.

**Include "incorporated" documents in one place**

The EVC is also aware that the EIR can "incorporate by reference" (Sections 15006(t) and 15150). In this case since there are many procedural questions pending and past WM's Bradley documents have been ambiguous at best, the EVC requests that pages, sections, and/or maps from earlier Bradley documents referred to in the EIR be included in an Appendix as possible.

We are aware of the tension between need to reduce paper and volume in EIRs and yet giving enough information to allow the public and decision-makers to make informed comments without unnecessary run-around. However, we have seen instances where project proponents use this tactic to wear down opposition by essentially making it too difficult to submit informed comments due to the lack of information.

Therefore, we also request that for all large documents or documents/studies from other agencies incorporated into or alluded to in this EIR together be available at the local libraries. This predominantly Latino, blue-collar community is involved in this decision-making process now but may be hard-pressed to research and track down past documents and documents from other agencies. Providing all the pertinent documents for the EIR in one place addresses at least one environmental justice issue and finally invites the local community to be involved.

The next set of comments directly addresses sections within an EIR.

**Aesthetics.** The location of this project is prominent both from the community street and from the freeway. Since mitigation has never been implemented this project is a blight to the community; the whole action of this project, on-site as well as off-site has the cumulative effect of further degrading the aesthetic quality of this neighborhood. The EIR needs to address past MND mitigation requirements as well as proposed future impacts and mitigation. The EVC also suggests mitigation later in our comments.

**Air Quality.** The additional impacts related to the degradation of air quality in this neighborhood are so obvious as to be obscene. As stated earlier the AQMD routinely receives tens of phone calls per week related to nuisance odor from the waste facilities in the area. AQMD has suggested that the number of complaints in this area has increased as



the height of the Bradley landfill has increased in height.

The project description includes the presence of a canopy. A project proponent sincerely interested in reducing the impacts of nuisance odors in this area would propose more. The EVC again offers mitigation measures later in our comments.

In addition, we are concerned about the schools in the area including but not limited to Byrd Middle School, Sun Valley Middle School, Fernangeles Elementary School and California Kids, a preschool and elementary school. We are concerned about the increased health risks to these children including asthma, lung problems and other allergic reactions. The EVC will be interested in the discussion on nuisance odor, dust, and VOCs emanating from the landfill and proposed expanded facilities as well as the diesel fumes emanating from the truck traffic associated with the MRF and transfer facilities.

**Geology and Soils.** We are interested in seeing a current description of the soils and geology (including faults and flood plain maps) as well as an analysis of the level of toxics, VOC's, heavy metals, and radioactive elements present at the site. We are interested in a projection of the future levels of these substances following the installation of a MRF and transfer station.

**Hazardous Waste.** We understand that this site will not include hazardous waste but we wish to see that definition extended to radioactive waste that is not greater than the background levels in the immediate area. Please discuss the current background levels of radiation in Sun Valley. Not an assumed level based on derived information but actual readings throughout the area.

**Hydrology and Water Quality.** This area is the intense focus of a cutting-edge stormwater project that proposes to infiltrate water rather than shunt stormwater to the L.A. River. Leachate from mixed waste trucks and wash water to clean the site could infiltrate into an already contaminated groundwater basin compounding a difficult problem even further. What assurances does this community have that the leachate or wash water will be detained and treated on-site prior to discharge either to infiltration areas or through the streets?

The EVC wonders how WM will detain the tens of millions of gallons of stormwater it currently detains when more than half the stormwater detention area is being proposed for a MRF. We were told that one rain event in Sun Valley resulted in 10,000,000 gallons being stored on-site. Where will this water go now? The community drives through the intersection of Tuxford and San Fernando during rainstorms at their own risk. How will WM accomplish this feat?

We are interested in a discussion by the project proponent regarding the State Water Resources Control Board's current requirements under the Standard Urban Stormwater Mitigation Plan (SUSMP) and Total Max Daily Load (TMDL) under Clean Water Act.

**Land Use and Planning.** We feel this community has enough waste facilities that can function in an M3 zone without suffering more such facilities in an M2-1 zone. Sun Valley has a higher proportion of these facilities than any other area in the valley and we feel enough is enough. The reason for additional facilities here will need to be reasonably

argued, well and hard.

Bradley Landfill has acted as a magnet for waste facilities and other heavy industry in an historic agricultural then residential area. We will closely examine the discussion on land use and planning.

**Noise.** We are interested in the current noise level analysis as well as the anticipated increase that would accompany the proposed number of trucks both for hauling waste in and out of a MRF and transfer facility. Since this site is close to a freeway, we believe the noise level would constitute a substantial temporary or periodic increase if not a permanent and significant increase in ambient noise levels in the project vicinity above levels existing without the project.

**Population and Housing.** Property values decline further as nuisance odors continue to increase and trash accumulates in the streets. Currently, this area of Sun Valley looks like a third world community that has been completely forgotten by the City. The EVC wishes to see a full discussion on comparing residential property values adjacent to the Bradley Landfill with residential property values several miles away from the landfill on the valley floor.

**Transportation and Traffic.** We would like to see the analysis of the truck traffic including present levels, estimated increase in volume as well as diesel gas impacts, number of operational hours, ingress and egress. This proposed project sits in a busy intersection, which is seasonally heavily impacted by stormwater runoff. Congestion increases significantly as cars periodically stall in the flooded intersection. In addition, the proposed project is immediately adjacent to a major freeway on-ramp. A proposed increase in traffic should be/will be carefully scrutinized.

**Utilities.** We again question whether wastewater from this site would exceed the current treatment requirements from the L.A. Regional Water Quality Control Board and the State Water Quality Control Board. We feel the water from this site could significantly exceed standards unless treated on-site prior to discharging into the local system.

**Cumulative impacts.** The EVC will be closely examining the sections of the EIR on cumulative impacts, spatial and temporal (historic and future). In the past, WM has managed to keep all the impacts associated with their projects carefully shielded from the public. We expect cumulative analysis to refer as far back as the 1975 and 1977 EIRS, the last time serious analyses was attempted. Future impacts must adequately analyze reasonably foreseeable significant environmental effects of this project and other projects in our community. We have seen WM deny their involvement in environmental problems arising out of the presence of this landfill in our community only to find that, indeed, they are at least one of the culprits causing problems. These problems are cumulative spatially and historically and we wish to see a full disclosure of them.

**Threshold levels.** The EVC will very closely look at the thresholds and we expect documentation for the decisions made for those thresholds. We are aware that agencies are responsible to set their thresholds. We expect the Planning Dept. to carefully check the documents prepared by WM's consultant and fully discuss thresholds and how each Environmental Factor exceeds or does not exceed these thresholds.

**Alternatives analysis.** The EVC will also closely examine the alternatives analysis including the no-project alternative. We expect a serious treatment of all these issues across all the Environmental Factors included on the check-list. We do not expect a one or two paragraph treatment of this very important CEQA requirement. With a 43-foot extension there are at least 44 alternatives. We expect an analyses of a reasonable subset of these.

**Environmental justice issues.** EJ issues should be addressed either alone or in combination with cumulative impacts. Since this issue is increasingly coming into focus on EIRs, the EVC will examine this section very closely.

### **MITIGATION MEASURES**

The EVC is opposed to this project but should this proposal travel the same road as Sunshine Canyon Landfill, the EVC wishes to suggest a series of mitigation measures that would be considered the minimum mitigation measures required.

#### **Full-time on-site inspector**

The EVC requests a full-time on-site inspector paid for by WM accountable to advisory committee be added as a significant statement to the community that there is someone to call at all hours to address Bradley Landfill issues. The request is commensurate with the on-site inspector at Sunshine Canyon Landfill and accountable to their advisory committee. The inspector would also retain copies for distribution of all the monitoring at the landfill.

#### **Restricted hours of operation**

Hours of operation should be restricted to 6 am to 6 pm including daily on-site cleanup. The only circumstance for violating these operation hours will be a crisis on the landfill such as stormwater erosion, migrating gas, or water leakage. No truck maintenance or other activities at all should be allowed during non-operation times. All activities should cease after 6:pm.

#### **Soil instead of ADC for cover**

Nuisance odor is a significant issue with the Bradley Landfill. Odors at night are detected as far away as Sherman Way. At night odors easily move down both Lankershim and Vineland unimpeded past Sherman Way. As the landfill rises even higher more nuisance odor will become entrained in air masses moving over the landfill site.

Presently, WM is using tarps and straw as alternative daily cover. This ADC is clearly not containing nuisance odors. The EVC requests that WM use 9" of soil for nightly cover in order to encapsulate the trash odor immediately and as the trash mountain continues to rise.

#### **Four sided building with negative pressure ventilation system**

A three-sided building with a canopy for a MRF and transfer station is completely unacceptable for this facility. This community is already heavily impacted by nuisance odor and this proposal not only does nothing for it but also makes the nuisance odor issue much worse. A project proponent sincerely interested in reducing the impacts of nuisance

odors in this area would propose a full enclosure with pressure to pull air into the building to be treated and filtered before being released into the community. Since this requirement is being required of other waste facilities in the area, we feel it is only fair to expect WM to build a similar facility.

#### **Depth of final cover**

The EVC is requesting final cover upon closure to be at least 10-feet thick to support the type of vegetation seen on nearby hills. This way the trash mountain built by WM will at least blend into the adjacent area. The EVC proposes native vegetation, coastal sage scrub and chaparral species, with trails be part of the final plan for the closed landfill. A thick soil layer of at least 10-feet is required to support this vegetation that includes shrubs, spreading shrubs, and small trees. This approach enhances the aesthetic character of this open space rather than retaining a bare green mound - looking like a burial barrow. Native landscaping with trees will allow this community to take back an eyesore and have it turned into something we can be proud of even from the freeway.

#### **Air Quality Monitors**

WM should support permanent air-quality monitors at the four schools in the area (Sun Valley Middle School, Fernangeles Elementary, Glenwood Elementary, and Byrd Middle School). In addition, WM should support a series or 'net' of temporary monitors throughout the area placed to determine the sources of the nuisance odors and any problematic chemical emitted from the waste facilities.

#### **Aesthetics**

WM has done nothing to mitigate the presence of a "brown lump" in the middle of our community. WM either ignored aesthetics as a problem or when significant impacts were admitted the mitigation was not accomplished. To begin to compensate for years of aesthetic and air quality problems WM should begin planting exclusively native landscaping, especially native trees, to surround the landfill's existing and proposed new facilities to act as a visual shield and slow down the movement of nuisance odors.

#### **Tree-planting in adjacent community**

Due to the years of ugliness this landfill has added to this area, WM should embark on a tree-planting program to beautify the area it has so sullied. From the property boundary climate appropriate native trees should be planted and maintained for 5 years within a 2-mile radius in all directions. This planting will include the concrete cutting, watering, pruning, chemical-free pest maintenance, and replacement as necessary for this period of time.

#### **Sidewalks**

Sun Valley does not have pedestrian friendly, safe sidewalks in spite of the fact that many people here depend on alternatives to car transportation. WM should at least provide pedestrian-friendly and aesthetically-pleasing sidewalks on all major thoroughfares within a 1-mile radius from the property boundary of the their facility.

#### **Triple the 'Trust Funds' for clean-up**

Due to the flimsiness of the 1-foot clay layer at the bottom of the landfill and following conversations with the LARWQCB, WM needs to triple the "trust funds" (we understand there are 4 funds) now in place to deal with the eventual leakage that will occur from this

landfill. The water-quality monitors will simply sound the alarm when a leak reaches them. Meanwhile, leakage problems occurring after closures have shown that the 'trust fund' money was insufficient to cope with the emergency when it finally arrived. Whatever is currently in place will be insufficient due to the admitted presence of radioactive construction debris from Rocketdyne and due to the presence of Bradley East an unlined landfill. The new, engineered liner at Sunshine Canyon is already leaking. The local residents and other taxpayers pick up the cost.

**Demonstration house for use of recycled content products and materials**

WM needs to demonstrate its commitment to recycling within this community by demonstrating to residents how to "close the loop" on recycling with a show place home renovated and landscaped with recycled content materials and using sustainable building and maintenance practices. Since WM bought a number of homes in the area, this project should fit neatly into its plan.

**Fully funded advisory committee indefinitely**

Whether or not the MRF is permitted, the advisory committee must be funded for the length of time that WM remains monitoring the site; it is our understanding that it is at least 30 years. The adjacent neighborhoods have the right to know almost immediately if problems begin to occur above, below, or adjacent to the landfill and facilities.

**Community web site with all monitoring data**

A web site to inform of conditions at this site which has historically operated beneath the radar. Now it is the community's turn to be fully informed of issues. The web site would include all monitoring data including but not limited to for air, soil, and water quality. The web site would *not* be available for WM to use as a public relations forum.

**Bi-annual street paving within 2-mile radius from property boundary**

In order to mitigate years of traffic impacts, streets in the surrounding neighborhoods should be paved every other year. Streets in this neighborhood have been chewed up for years by the truck traffic from WM moving through the area.

**Future of WM employees**

As stated in our Feb. 13 presentation, the EVC is interested in the employees of WM. We would like to see:

- A tuition reimbursement program for full and part-time WM employees.
- Paid leave time for professional or technical development classes.
- A job placement center and ombudsman to transition employees to comparable or better jobs following the closure.
- A fund to allow employees to "borrow" funds for expenses during the transition time to a new job.

We appreciate the opportunity to submit these comments for consideration. Please send copies of the EIR *and* all supporting technical documents to Carol Ann Zeihler 11936 Wicks Street, Sun Valley, CA 91352 and Ellen Mackey, 8300 Valecrest Dr., Sun Valley 91352 and the address below.

Sincerely,

Carol Ann Zeihler  
President, etc  
P.O. Box 3348  
Burbank, CA 91508

cc: Councilwoman Ruth Galanter  
Councilwoman Wendy Greuel  
Councilman Alex Padilla  
Assemblywoman Cindy Montenez  
Tony Cardenas  
Supervisor Zev Yaroslavsky  
Senator Richard Alarcon  
Mayor James Hahn, (James Burkhardt)  
Michael Papanian (Peggy Farrell) CIWMB  
Kit Cole, CIWMB  
North Valley Coalition  
Dennis Dickerson, swqcb  
Jonathan Bishop, larwqcb  
Dave Castanot, acoe, Los Angeles District

5-29-03

Good Afternoon Jimmy -

I'm a resident in Sun Valley who telephoned you last Friday 5/23 around 10 AM. This is Doris Jannons. I hope you remember our conversation.

My main concern re: Bradley Janoffill

ER NO: ENV-2001-3267-ER;

SCH NO: 2002121027

are: ① People - is it safe? Looking @ your map, it's very close to my home. I am very happy with where I live.

② Wildlife - Animals & plants reside in all the nearby canyons.

La Jure Canyon  
Big Jure Canyon  
Little Jure Canyon  
Kazel Canyon

③ Environment  
Need say more?

I object.

Thank you  
Doris Jannons

May 23, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Room 763  
Los Angeles, CA 90012  
FAX (213) 978-1343  
E-mail [jliao@planning.lacity.org](mailto:jliao@planning.lacity.org)

**Bradley Landfill, EIR No.: ENV-2001-3267-EIR SCH NO.: 2002121027**  
RE: April 24, 2003 Public Scoping Meeting

Dear Mr. Liao:

This letter is being written to oppose the proposed plan to increase the height of Bradley Landfill from 1010 ft. to 1053 ft. above mean sea level. I am also against the proposed Plan of a transfer station to transfer 6,000 tons of trash per day as well as the Materials Recovery Facility (MRF) that would process 1,000 tons of trash a day

I am concerned about the cumulative negative impact to our area as well as negative impacts to our air, water table, property values and quality of life. In addition, I am concerned about exposure to increased radiation, gasses and other toxic substances, pollution from increased traffic and damage to our roads. How will these concerns be studied in preparation of the EIR and subsequently?

As a resident of the eastern part of the Valley, I am outraged at the offensive nature and health hazards of a mountain of trash in the middle of a community filled with families and schools. **NO MORE TRASH IN SUN VALLEY!**

Sincerely,

Mabel Rodriguez  
15132 Roscoe Blvd. #2  
Panorama City, CA 91402



May 23, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Room 763  
Los Angeles, CA 90012  
FAX (213) 978-1343  
E-mail [jliao@planning.lacity.org](mailto:jliao@planning.lacity.org)

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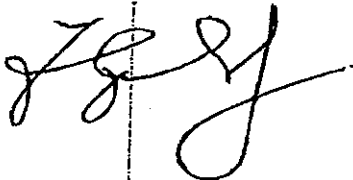
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As a resident of Sun Valley, I am outraged at the offensive nature and health hazards of a mountain of trash in the middle of our community. **NO MORE TRASH IN SUN VALLEY!** It is time other communities be held responsible for their own trash. That is the mitigation measure our community is asking for.

Sincerely,

Felipe De Avila  
7749 Vineland Ave.  
Sun Valley CA 91352



May 23, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Room 763  
Los Angeles, CA 90012  
FAX (213) 978-1343  
E-mail [jliao@planning.lacity.org](mailto:jliao@planning.lacity.org)

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As a resident of Sun Valley, I am outraged at the offensive nature and health hazards of a mountain of trash in the middle of our community. **NO MORE TRASH IN SUN VALLEY!** It is time other communities be held responsible for their own trash. That is the mitigation measure our community is asking for.

Sincerely,

Guadalupe De Avila  
7726 FAIR AVE  
SUN VALLEY CA 91352

*Guadalupe De Avila*

Ref. } ENV-2001-3267-FIR  
SCH No.: 2002121027

Attention  
Jimmy Hiao

Dear Sir;

5-28-03

In addition to all the (142) obvious reasons mentioned many times, here, I believe, are some additional problems we'll have if Waste Management gets their way with a transfer station (or anyone else!):

A transfer station using the rail would (unlike the fast metro) tie up our already busy intersections of Hollywood Way, Buena Vista, Sunland Blvd., Penrose, and Osborne.

Also, if the Siling rail is on the Union Pacific or MTA's property and it abuts Bradley (or Vulcan) they might be able to park their box cars there for days causing a visual blight!

And, of course, those microscopic particles flying as they dump trash, recyclables, etc. into the box cars near the center of our

H

town must not happen.

While the other communities improve and expand theirs, they cannot send all their trash and recyclables to Sun Valley 6:AM to 8:PM, seven days a week... forever!

We've paid our dues and more. Enough is Enough!

Jerry Ford vice pres.  
East Valley Coalition

phone/fax:

(818) 767-8677



East Valley Coalition

P.O. BOX 1048  
BURBANK CA 91508

# Air Particles Linked to Cell Damage

An L.A.-area study finds the tiniest pollutants disrupt basic cellular functions, likely causing a host of diseases.

By GARY POLAKOVIC  
Times Staff Writer

LA Times 4-7-02

A team of Southern California researchers has discovered that microscopic airborne particles can disrupt the inner mechanics of cells, offering a possible explanation of how air pollutants common to urban haze can harm the human body.

The new study, led by scientists at UCLA and USC, links the most minuscule particles found in dust and smoke to injuries. The particles are so small — about 1,000 could fit inside the period at the end of this sentence — that they easily bypass the body's defense mechanisms.

The findings also are the first to show that very tiny particles travel beyond the lungs and bloodstream to penetrate deep inside cells. The pollutant accumulates within a critical component that powers the cell and maintains its function. Damage to that cellular component is known to lead to an assortment of diseases.

The study is scheduled to be published this week in the journal *Environmental Health Perspectives*, a publication of the National Institute of Environmental Health Sciences, and is currently available on the journal's Internet home page.

Researchers have long known that haze over major cities causes a wide range of health problems. Numerous studies worldwide have linked particle pollution to school absences, hospital admissions, shortened life spans, reduced lung function, heart disease and cancer. The U.S. Environmental Protection Agency established rigorous standards for curbing particle pollution in 1997. The agency estimates that those rules will prevent 15,000 premature deaths, 350,000 cases of asthma and 1 million cases of lung problems in children by the year 2020.

But researchers have been unsure what types of particles were to blame for the health ef-

fects.

"We have had no idea of the biological potency of different size particles in the air," said UCLA researcher Andre Nel, a physician and lead author of the study. The new research "may be a mechanism to explain how the smallest particles cause adverse health effects," he said.

Particulate matter turns the sky gray with gauzy haze, limiting visibility. It consists of microscopic bits, ranging from pulverized tire fragments to diesel soot to acid droplets, and is measured in microns, a unit equivalent to a millionth of a meter. A human hair is about 50 microns across.

Currently, environmental regulations try to limit particles that are 10 microns in diameter and smaller particles in the 2.5-

[See Particles, Page B6]

# Research Links Tiniest Particulate Matter in the Air to Damaged Cells in Humans

4-7-02 L.A. Times

(Particles from Page B1) (B-6)  
 micron range. But the particles that caused the most damage in the new study are one-tenth of a micron across.

Dust and smoke are made of particles of about 10 microns. The smallest particles come mainly from burning fossil fuels. Those tiny particles float in the air longer, travel farther and are more easily inhaled than larger ones.

The Los Angeles Basin ranks as one of the worst places in the nation for particle pollution. The highest concentrations typically occur in western Riverside County. But the Los Angeles-Long Beach area has more of the tiny particles emitted by vehicle exhaust. Using the region as a laboratory, the EPA established one of five national particle-pollu-

tion research centers at UCLA, which produced the latest study. In their study, the team of 10 scientists collected particles in various sizes from air above Claremont and the USC campus near downtown Los Angeles between November 2001 and March 2002. The pollution was concentrated, put into solution and added to two types of cells.

One group of cells included macrophages taken from mice. A macrophage is a type of cell that scavenges and destroys foreign matter in the lung and other organs. The other cells were taken from the lining deep inside a human lung. The scientists then measured chemical reactions in the tissues and examined the cells with an electron microscope.

The researchers found that when the particles come in contact with the cells, they trigger a reaction that causes inflammation. That may help explain how particle pollution exacerbates asthma, an inflammation of the airways, Nel explained.

Deeper inside the cells, researchers found that the one-tenth-of-a-micron particles ac-

cumulated inside cell structures called mitochondria. Oblong in shape, mitochondria are the workhorses of cells. They combine sugar and oxygen to produce the fuel that keeps cells running.

The study shows that the pollution damaged the shape of mitochondria, causing them to stop producing the cellular fuel and start producing other chemicals, which lead to more inflammation and cell damage.

Melanie Marty, chief of air toxicology and epidemiology at the California Office of Environmental Health Hazard Assessment, said the findings highlight the danger of the smallest particles, which have not been the focus of regulations of air pollution. She did not work on the research, but is familiar with the paper.

"The mitochondria of a cell is like a cell's battery. Once you damage the mitochondria, you're going to kill the cell," Marty said. "This shows the ultra-fine particles are better at causing damage, and we should be paying more attention to ultra-fine particles because of their

toxicity and ability to produce this stress in the cell."

The study comes with some limitations. Scientists examined pollutants at just two locations in the Los Angeles region. Particle pollution varies by concentration and type across cities.

Also, the pollution that the cells were exposed to in the study is more concentrated than what is typically found in ambient air. The researchers cautioned that their observations come from the laboratory and that more studies are needed to see if similar results occur in people or animals exposed to less concentrated pollution.

Fernando Scaglia, a professor in the department of molecular and human genetics at Baylor College of Medicine in Houston who has read the paper, said damage to mitochondria in cells can lead to various diseases, including Parkinson's and Alzheimer's, as well as strokes and other neurological impairment. Damage to mitochondria, he said, can increase over time as cells divide, leading to a breakdown of cell function and early onset of disease.



East Valley Coalition

P.O. BOX 3342  
 BURBANK, CA 91508

Jerry  
 East Valley Coalition

Date: 17 May 2003

Department of City Planning  
200 North Springs Street, Room 525  
Los Angeles, CA 90012

Attn: Mr. Con Howe, Director, Department of Planning

Dear Mr. Howe:

I, Lee Nielsen, Sun Valley resident, am writing this letter as a concerned citizen who would like to go on record as being strictly opposed to the granting of any permit that would allow Waste Management, Inc., to continue to expand its operations at the Bradley Landfill, here in Sun Valley, or allow a MRF or transfer station. The management of this landfill is requesting permission to operate from 6:00 p.m. until 12:00 midnight, and this is supposed to be permitted to continue in perpetuity. These are not my idea of hours of good neighbor operation, and I hardily oppose these hours also!

Waste Management took possession of this facility in 1959, the 18<sup>th</sup> consecutive landfill to be operated in our community. Seventeen landfills dot our landscape, and five more are found in the Pacoima area. In short, this community has been asked to suffer the various pollutants and pollution that accompanies all landfills, for more than their fair share of time. Over six decades of continuous toxic assaults on our health and all of the blights that accompany these operations. Two schools are located within a mile of the landfill boundaries. Our air is filled with obnoxious odors, our lungs with pollutants; our children suffer the highest incidence of asthma in the entire LAUSD district. Heavy trucks crater our streets with potholes; pollute our air with diesel fuel fumes, all of this and much more, inclusive of human beings trying to live their poor existence within 100 feet of the landfill. Their health is imperiled, their real estate values seriously reduced and they are trapped, unable financially to move from the area.

Please, enough is enough, deny any further permits, close the landfill and end an era of shame and pollution in our area. The place of landfills, auto-dismantling shops, plating companies, and every possible polluting agent that you can imagine. Stop this injustice and stop it as soon as legally possible!

Sincerely,

*Lee Nielsen*

Lee Allen Nielsen  
8101 1/2 San Fernando Road  
Sun Valley, CA 91352  
818.767-2406

RECEIVED  
JUN 05 2003  
CITY PLANNING  
DIVISION OF LAND

RECEIVED  
CITY OF LOS ANGELES

MAY 27 2003

CITY PLANNING DEPT  
EXECUTIVE OFFICE  
ROOM 1640

Date: 17 May 2003

Los Angeles Dept. of Planning  
200 North Spring St., Suite 525  
Los Angeles, CA 90012

19 May 2003

Attn: Mr. Howe, Director, Department of Planning



Dear Mr. Howe:

I, Ron Hall, Sun Valley resident, am writing this letter as a concerned citizen who would like to go on record as being strictly opposed to the granting of any permit that would allow Waste Management, Inc., to continue to expand its operations at the Bradley Landfill, here in Sun Valley, or allow a MRF or transfer station. The management of this landfill is requesting permission to operate from 6:00 p.m. until 12:00 midnight, and this is supposed to be permitted to continue in perpetuity. These are not my idea of hours of good neighbor operation, and I hardily oppose these hours also!

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Sincerely,

Ron Hall  
Post Office Box 1631  
Sun Valley, CA 91353-1631  
818 768-3708

MAY 27 2003

CITY PLANNING DEPT  
EXECUTIVE OFFICE  
ROOM 1640



5/23/03

Eric Vincent Cruse  
P.O. BOX 16479  
North Hollywood, CA 91615

Honorable Mayor James Hahn  
Los Angeles City Hall - Room 303  
200 North Spring Street  
Los Angeles, Ca 90012  
[www.lacity.org/mayor](http://www.lacity.org/mayor)

RECEIVED  
JUN 05 2003  
CITY PLANNING  
DIVISION OF LAND

Reference: April 24, 2003 Scoping Meeting ENV-2001-3267-EIR SCH No. 200112127

Dear Mr. Hahn,

My name is Eric Vincent Cruse. I am a concerned citizen who would like to go on record as being opposed to the granting of any permit that would allow Waste Management Inc., to continue to expand its operations at the Bradley Landfill in Sun Valley, or allow a MRF or transfer station. They are asking to change their hours of operation from 6:00a.m. - 8:00p.m. To a lengthened 6:00a.m. - 12:00 midnight... forever!

At this time it is inexcusable for the Los Angeles City of Environmental Affairs @ (213) 978-0888 or the Local Enforcement Agency @ (213) 978-0892 to have given Waste Management Inc., their permit extensions beyond their original permit and design. It was not designed for the extra weight and may breach, if it has not already, and contaminate "The Los Angeles Basin" which if you did not already know is basically a huge water retention area. In the very near future this "water storage area" will be in demand due to the water supply needs of millions of the "Greater Los Angeles Lives." If the quote, unquote "Leaders of our Community" don't start to act like leaders perhaps someone such as myself will have to expose the fact that the "Leaders" of the past as well as the "City Planners" never seemed to take into account the future needs of the "Greater Los Angeles" area! Now you may or may not have seen the piece on the "Channel 4 NBC News" yesterday, but in case you had not, let me give you some facts. I am the guy who went to get the copy of the "Local Enforcement Agency" report, which was dated May 1, 2003 entitled "Bradley Landfill Investigation Report." Upon being completely offended by the lack of respect to my eye - witness account, by the departments findings and utter disregard to their duties as a "Local Enforcement Agency" by literally taking "Waste Management Inc.'s" "word for it" that they were being truthful, I was left with no other choice than to take the report directly to the "Mayors Office!" I had to go "feed the parking meter" first though and upon leaving the building through a different entrance than the one in which I originally entered I noticed that there were metal detectors and armed guards or police, which ever ones they were and I thought... Hmmm! That's

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CITY PLANNING  
EXECUTIVE DEPT

strange, how did I just get into a building at one entrance with "NO GUARDS AND METAL DETECTORS" only to leave the very same building with the afore mentioned accoutrements? As I walked down the stairs the CBS affiliate cameraman was walking in and I said, "Yo, brother... what's going on?" And he replied, "The Mayor is giving a Press Conference." And I thought, "Gee... what a great opportunity for me to possibly get some free publicity from the press, and for them to finally listen to a concerned citizen about this public outrage which has gone on, unheard, long enough!" So I went to the store on the corner and bought a 32oz. bottle of original flavored orange "Gatorade" because they didn't have fierce grape and got the change needed to "feed the meter!" I then proceeded to "the meter" and "fed it!" I decided I should go and ask the guy or "people" at the news van where exactly is this "Press Conference" in the building. Before I got to the place to cross the street I looked down and saw, low and behold, a City Hall employee's security identification badge on the ground in front of me! I picked it up, crossed the street, and... was sad to find they would not answer the door of their van. But that proved not to be a problem for there was a memo hanging on the open door of the "Audio/Video Patchbay" out side next to where the news van had parked so they could tie into the live feed of the "Press Conference Room." So... I read it! Low and behold it read, Media Advisory Contact "Angie Levine" would happily answer any questions anyone might have, so... I called the number (213)978-0741! I asked for Angie Levine and said, "Hello, is Angie Levine in?" The woman said, "No." So I said, "I was going to the press conference and wasn't sure if I was going to make it in time and didn't know what floor it was on." The woman replied, "Well you've got 15 minutes and it's on the 3<sup>rd</sup> floor." "Thank you," I replied. I then entered the building on the side which I entered earlier that day and went straight to the elevator, got on and noticed that I had entered the elevator on the third floor... so, I got off. I then started to look around and after about five minutes or so found the "Mayors Office." Upon approaching the officer or guard at the entrance, I thought well, he will either turn me away or let me in... so I said, "I'm going to the Mayor's Press Conference." And he said, "Go right this way, Sir." I then literally followed all the other people going to the "Press Conference." Upon entering I took a spot out of the way and listened to the conference begin. When it was announced that it was a "Press Conference" on the level of the "Homeland Defense Levels" being raised to "High" I thought, "Ought Oh... How do I get out of here without getting arrested?" Then as I heard the reporters start asking their questions about, how are we as the "City of Los Angeles" going to pay for this increase in "Homeland Defense" when the President in all his so called wisdom has not yet sent money from the Federal Government to pay for all of this extra financial burden !?! I then had an epiphany... and a sudden burst of courage! I saw how these reporters were quite rude in how they just blurted out their questions and the loudest and pushiest one prevails, so... I formulated my question, wrote it out... and took over at the end of an answer! I asked, "Is the new Los Angeles City policy for off setting Federal Dollars for Homeland Defense done by letting companies like Waste Management Inc., pay millions to offices like the Los Angeles City of Environmental Affairs or the Local Enforcement Agency for illegal permit extensions for the Bradley Landfill as well as the Chemical Company that Erin Brokovich is fighting in Beverly Hills?" Now as you can probably guess no one in the room expected a question directly from the left field like that, but it did cause the woman in charge to say, "I think that this press conference is over!" I think only two to

three more questions were asked and then everyone was whisked out immediately. Some one asked me, "What the hell does Erin Brokovich have to do with any of this?" I then explained that the only reason I was there was because I could not believe how the report which I came to get in the "City Hall" building had been sent to two different addresses that were both incorrectly taken, or not even sent at all, by Martin Rosen and Vivian Marquez both from the "Local Enforcement Agency" or "The Los Angeles City of Environmental Affairs," which ever one it really is, because I had been led to believe it was the later originally. I then explained how I basically just walked into a "Press Conference," unknowingly, on the raising of the level of the "Nationally Raised Homeland Defense Security Thing." And that's when all the cameras went back on... "Now news was being made!" As the microphones started being put into my face and cameras all started to roll I said what I could before the police started to realize, "Hey... What did that woman just tell us about a guy that was not a reporter there to ask questions about their agenda, in the bright red shirt, the bermuda shorts and the almost glowing 32oz. bottle of orange Gatorade!?!". So then as you can imagine a circus in sued as I told them, "I'm glad I was here only to tell the "Mayor" how unimpressed I was with one of the City of Los Angeles's "Local Enforcement Agencies" and that "I was not a terrorist!" Oh... and here's a security badge I just found laying outside on the ground about seventy five feet from the door with all the "metal detectors and guards or police." Of course I had to deal with the embarrassed officers and the other people trying to save face in front of more than a half dozen news cameras.

Now all I have to do is decide what to do, since I am a "Professional Film Maker" and have film credits on such movies as "Mothman Prophecies" and "Minority Report!" I guess next I'll have to get a new agent and see if Jay Leno and David Letterman are ready to hear about how I just walked into the second largest city in the nation just trying to be heard as a concerned "Native American Descendant," oh... and "Citizen" trying to be taken seriously about why is it that my witnessing the "Worlds Largest Waste Management Company" called "Waste Management" along with a handful of other "Citizens" are not honest enough to be taken seriously... or sure of what we saw!?! Well, all I can say if no one in "The Los Angeles City Hall" building can actually get the honest truth out about getting day to day business done like pulling "Waste Management Inc.'s" permits, for doing things in the past, before they had permits. And how "City Planning" seems to rubber stamp every other deep pocketed project that comes along whether it goes through the proper channels, or is not properly explained to the locals in neighborhoods who may not even have the reading skills to read the public notices of projects to take place in their own back yards and may not understand whether it is safe and may affect their health; one must wonder who these people in elected offices are really working for... the people or the corporations!!! In a recent project for a Waste Facility in Sun Valley the Mitigated Negative Declaration was unavailable as stated through the Public Notice and the Mitigated Negative Declaration had to be reissued two times due to the procedural errors made by the City. This lack of attention is unacceptable and we will be watching you very closely...as concerned citizens! I won't even go into the part about security at "City Hall" in the "Homeland Defense" incident due to the fact that I was unharmed and can still get this letter sent in time with the attached report with the cover letter addressed to me as I was the complaining party whom reported Bradley for violating their hours of operation. I witnessed Waste

Management Inc., Dumping new garbage with a convoy of at least a dozen "Dipsea Dumpster" type compacting trucks from approximately 11:00p.m. To approximately 2:00a.m. on the top of the west ridge of their property which runs parallel to Sheldon Street and is adjacent to the business park at which I rent space on April 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup>. These are the kind you see lifting those large dumpsters at business parks with fork lifts and then compacting their inner contents as to carry maximum loads "to a dump" not "relocate material on their own property which they have already previously brought to the dump property!" You see I have to clarify this type of information because the people at Waste Management Inc., have some how confused people about this situation as if I or any one else who has witnessed their activity in plain sight of any one working or living near their facility, for any amount of time, are not smart enough to know the difference of a compacting transport truck from a huge land moving bulldozer which is how they "Push" the garbage around on their property when they want to move garbage from "Point A" to "Point B." There fore by reading the report attached, who exactly is this bogus report supposed to pacify? Me the plaintiff who is basically being called a liar by the Local Enforcement Agency Employee's, or the people who obviously must be paying your offices off to do half hearted, glossed over, incomplete investigative reports. I already told Martin Rosen and Vivian Marques that if they wanted to actually catch Waste Management Inc., breaking the law first they should get the "City Attorney" to seize Waste Managements Inc., payroll. Then they should provide the surrounding businesses such as myself with a 24 Hr. on call pager number so we may call someone from their office to go on the clock and come out and actually "catch" the crime being committed. After all they are calling themselves the "Local Enforcement Agency" these days!?! I still expect to get that 24hr number I noticed Martin Rosen or Vivian Marquez didn't even mention it in their report. Oh that's right... that's just another ball being dropped in the 200 Spring St. Building called "City Hall." Here's an even better question for you, if people at "City Hall" want to continue to do only half of their jobs then why don't we pay them only half of their pay!?! Perhaps if we made peoples paychecks directly proportional to their work completion we could either get more work done or pay off the Home Land Security Debt.

Next I would like to talk about the "Air Quality Management Department." Now these guys from what I've seen can get things done! Yet I've seen no proof of the \$50,000 fines being paid to them from violators. This I am now requesting to see in writing. I would also like to see in writing an acceptable "Laymen's Terms" explanation as to how it is that one of the only "Government Agencies" I've seen be able to get anything enforced has to worry about being sued by Waste Management Inc., for enforcing the law! Hasn't anyone been keeping score, since Enron, the government is supposed to be stopping companies from raping the community not rewarding them...! Oh wait, I guess this administration is rewarding these types of companies and hasn't yet started prosecuting them... that's right... I guess California politicians don't want to start any trends! And since I'm on the quality of air, can someone from the California Government please explain to me who RES is? Men in blue shirts saying RES in white letters come down to all of the businesses and act like their official "Air Quality People" yet when Larry Israel from the "Air Quality Management Department" questioned one of these teen age looking young men in front of me one day he made it perfectly clear to me he didn't know them, who they were, what exactly their job was and who they actually

worked for! Apparently as Mr. Israel questioned the young man the "Blue Man Group" was recording time, date, air speed and direction as well as light smell, medium smell and heavy smell. Now I don't know what light, medium and heavy has to do with anything, but I tell you from my experience it is not directly proportional to light, medium and heavy flow of stomach acid or food coming up with a direct head wind! Maybe it is directly proportional to headaches, nausea and nosebleeds...I'm not sure maybe Martin Rosen and Vivian Marquez can prepare a report! Hey, I know... maybe we can get someone at City Hall to make Wayne Tsuda actually earn his keep too and make his flunky's do their damn jobs! I'm sorry I should finish with the "Blue Man Group." Now as Larry Israel asked, "Young Blue" to call up to "Old Blue" who was up at the west ridge of the garbage heap on the walkie. He asked what the time, airspeed and direction was right then after questioning how they were collecting this info. "Young Blue" said, "The weather machines at the top of the ridge," and we could see them as Mr. Israel called them by their scientific names. "Old Blue" came back with the info and then asked, "Where are you now Young Blue? Are you at the complaint sight?" As Mr. Israel and I walked away I asked, "Did he just refer to this as the complaint sight?" Mr. Israel looked me dead in the eye and said, "Your right he sure did." He then turned around, walked straight up to "Young Blue" and asked, "When Old Blue just asked you where you were he referred to this as the complaint sight and you replied, Yes. Why did he refer to this as the complaint sight?" "Young Blue" replied, "I don't know" Mr. Israel asked "Young Blue" to call back to "Old Blue" for an answer. After "Young Blue" said, "I'm not going to ask that." Mr. Israel had to use force by explaining to "Young Blue" that he was from a "Government Regulating Agency" and if "Young Blue" didn't do as he requested Mr. Israel would be forced to file a report. "Young Blue" said, "I'm not going to do it, you do it" and he tried to hand the walkie to Mr. Israel. Mr. Israel then explained to "Young Blue" that it was his walkie and his job and that it was now time for him to do his job! "Young Blue" finally asked, "Old Blue?" "Yes," said "Old Blue." "There is a man from Air Quality Management Department here asking why you referred to this as the complaint sight," said "Young Blue." "Old Blue" replied, "Because that's where all the complaints are coming from." Later I asked Mr. Israel is the company "Waste Management" supposed to know who is making the complaints and he said emphatically, "No, they are not, it looks like someone is informing them!" So now my direct question is who in what "Government Office" is disseminating information to "Waste Management Inc.," about who is complaining about their smell or their dumping violations or any other complaints about any other violations they may be doing? Next I would like to touch on my four questions, which were handed in on April 24, 2003 for me by Ellen Mackey. Now the interesting thing was I could not make that "Public Scoping Meeting" because while I was working on Miami CSI that day as the Key Grip, the Gaffer, Mike Marquez was 30 minutes late and then continued to not help speed things up and actually helped make the day run late! At some point in time I finally asked Mr. Marquez if he was related to Vivian Marquez at the "City of Los Angeles Environmental Affairs" office. Oddly enough he finally said he thought that she was his cousin. Now I realize that this sounds like a conspiracy theory, but I must make this point perfectly clear. The fact that every thing related to this particular case has had some type of unbelievable stink associated with "Waste Management" forces me not to


leave anything to chance. So just in case I'm reattaching the four questions from the April 24<sup>th</sup>, 2003 "Scoping Meeting" and will refer to specific recaps now.

★ Number one I expect to see in writing, what I personally feel, is the most important answer of all, to the question; How much of the 1957 "Rockadyne Meltdown" of 11,000 tons of nuclear radiated material (i.e., Concrete, Asphalt, Uranium U235, Uranium U238, Plutonium, Deuterium, Tritium, Alpha, Beta, and /or Gamma baseline trace amounts as well as Chromium 6) is buried at Bradley and how can Waste Management Inc., prove to all living beings in and around the Bradley Landfill that it is not only leaching "Leach ate beyond 940pCiU but also not contaminating "Silica"...(you know, sand particles) which they constantly move around and virtually make airborne with their bulldozers which then does not only cover my car and everything else in my building as well as all of Bradley's other neighbors but also ends up in my lungs and therefore to produce a registered Derived Air Concentration or DAC Level which is derived by the United States Nuclear Regulatory Commission to limit the Chronic Occupational Exposures to inhalation of radioactive materials. By the way let's put that in the accumulative scenario as to not forget some people may be here longer than others! P.S.: Let's not leave out the proof that there is enough money set aside to pay all medical bills to all living creatures contaminated by "Waste Management Inc.'s" potential carelessness in such a disaster from the "57" spill as well as what ever else was brought in during the "80's" or "90's" which has also been brought to my attention. Thank You.

★ Number two I have already talked about, the complaint about the dumping on April 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup> from 11p.m.-2a.m. but I must insist on a timely response to getting a 24hr. number to call so that the "Local Enforcement Agency" can actually do some enforcing! It's great that we've got a Police Department to put speeders in jail and people who want to drink too much or smoke something that naturally grows out of the ground; but when we ignore deep pocketed international conglomerates who want to pollute and contaminate the whole damn ecosystem in which we live and depend on for the survival of all living beings perhaps we should consider handing out 45 caliber party favors to blow out our brains with when the pain from all the nuclear and chemical contaminates get too unbearable!

★ Number three, If the past earthquakes have not cracked the one foot thick clay liner yet maybe the next one will or maybe the 43 feet of how many tons of garbage Waste Manage is seeking the new permit for will! And then what...Oh yeah, like all energy forms, the methane gas follows the path of least resistance and will find it's way in the next fault line under Sheldon Street across from Bradley to that huge ignition source across the street, you know, the Department of Water and Power's electric generating plant (boy that's a tragedy waiting to happen)! Now I have not been able to get my mom, dad and uncle to pull their heads out of N.A.S.A. and Cape Canaveral due to the Shuttle accident and the pending Mars program but the Pyrotechnicians I work with on Miami CSI said something about how one gallon of vaporized gasoline equates to something like nine to ten sticks of Dynamite!!! Therefore 111,000 cubic feet of vaporized methane equals how many sticks, pounds, or tons of Dynamite?! Perhaps "Waste Management Inc., can put their heads together and answer this pressing question because the building 61 feet from it's property line is asking to wager it's devastating power vs. it's easily 200,000 cubic foot neighbor "the other vacant building" just 20-30 feet to the right of the first building. By the way that's only a heavy truck driving on you access road away


from causing a subsurface migration crack only 61 feet from your 200 foot deep rocket fuel storage tank...BOOM!!! After my mom gets done head chopping as The United Space Alliance's "Hatchet Bearer" determining how much "Moog" had to due with the Shuttle accident maybe she can do some number crunching to tell you how many "Solid Rocket Boosters or Newton's which is pounds / cubic inch in thrust potential your little fuel farm is producing annually! Squelch... Beep... Come in Huston this is the International Space Station... beep... It looks like California just Broke off at about Glenn Oaks Blvd. or is it Foothill Road... Squelch... Beep!



Which brings me to number four... N.M.O.C.'s (Non Methane Organic Compounds), H.A.P.'s (Hazardous Air Pollutants), V.O.C.'s (Volatile Organic Compounds) Gee... I feel like I'm back at Merritt Island... That's between Cocoa and Cocoa Beach. N.A.S.A. Is actually part of Merritt Island and Cape Canaveral is actually part of Cocoa Beach. The V.I.B. is at one and the V.A.B. is at the other in fact mom authored the original acronym book at the Cape I can't remember if it was Martin Marietta or at E.G. &G. at Propellants South when she cleaned up the "Acid Rain"... Hmmm. Oh well, if we need to get that H.A.Z.M.A.T. clean up going I got her number. She's got these really cool H.A.Z.M.A.T. suits as well as these Space suits that can take pressurized conditions as well as Hazardous Materials scenario's those might come in handy if the hole blown in the ground fills with all the damn water from the Hanson Damn and those Retention Ponds. I've got an idea; mom's thesis in college was to launch all the radioactive material to the sun to clean up this damn planet and dad designs and builds the worlds largest launch pads "Launch Complex 40" which is rated at 500,000 pounds / cubic inch of lift capacity and "Launch Complex 41" which is actually smaller. Maybe he can design one with mom to launch all of your crap to the moon and then we can pollute that too... oh yea! Or maybe we can just put it all into orbit and we can "wish upon a jar" as it all burns up on re-entry! I know this seems absurd but Wayne Tsuda and Vivian Marquez had over a month and a half to get the following report to me and since Marty Rosen apparently could have just made a phone call, and probably did, to "quote, unquote investigate" this particular case by asking Waste Management Inc., "Did you guy's break the law?... Huh... come on guys... tell the truth?" And then they only give me basically one day and night to respond around my twelve hour per day film shooting schedule this week to respond! Come on guys I'm on no sleep and running around video taping renegade rail spurs, on my time off, to be put in with tax payer dollars for independent companies profiting off of our "tax rails!?" Wait a minute Ozzy Ozbourne and Bush are teaming up again with Waste Management Inc.,(We're fly 'in off the rails of the "Crazy Train") or was it Vulcan...That's right, that's what the foreman of the Metrolink told me today that the "Passing Lane" for the Metro link was also having a spur put in for Vulcan... That's rich! Please include a copy in writing of the permit and the canceled check to the taxpayers of Sun Valley and Los Angeles for the rail spurs which have nothing to do with the "people mover" part of the Metro link rail project being installed on San Fernando Rd. adjacent... please... Thank You.

So in closing since I've been up for over 30 hrs straight trying to respond in time to this late report. I want to let all parties concerned know that due to the wonderful Cannel 4 NBC piece I was able to get through to Erin Brokovich's people to see if she might like to join our cause or give us the proper CEQA Lawyer contacts as well as I may have to call my old acting buddy Wayne Brady, my old college buds The Blair Witch Boys and

every other Producer, Director friends I know as well as thoughts Late night boys Leno, Letterman, and my old boss Jimmy Kimmel to let them bring this new comedy material "The Homeland Defenseless" to the masses! That means this document (if you can call it that) always has a home for a good laugh on the Howard Stern Show... HA, HA, HA!!!

 P.S. I am now formally requesting a copy of the E.I.R. with all technical documents for me and all thirty thousand residents and business's that were mailed out for the April 24, 2003 scoping meeting notice.

P.S.S. I also want in writing an explanation for the reason as to why if 30,000 - 35,000 copies of the April 23, 2003 Public Scoping Meeting notice was sent to every one in the community why is it that Ellen Mackey got 2 copies, Bill Griggs got 2 copies, Jerry Piro got 4 copies and Joe Tarendek got 8 copies... now why is it that people 500 feet to ¼ of a mile away from the dump did not receive one!?! At this rate 2 people = 10 copies therefore only about 15,000 people out of a minimum of 30,000 - 35,000 were actually notified... why weren't the duplicates eliminated!?! I would like an answer that actually explains the truth not a glossed over B!#\*S#!T answer and I would like copy of the list! Thank you and good night.

(It is now 2:25a.m ! Thanks Vivian!)

Sincerely,

  
Eric Vincent Cruse



ENVIRONMENTAL AFFAIRS  
DEPARTMENTDETRICH B. ALLEN  
GENERAL MANAGER200 N. SPRING ST.  
ROOM 2005 MS 177  
LOS ANGELES, CA 90012  
(213) 978-0640CITY OF LOS ANGELES  
CALIFORNIAJAMES K. HAHN  
MAYORENVIRONMENTAL AFFAIRS  
COMMISSIONJEFFREY KABOT  
PRESIDENTMARY LEUVANO  
VICE-PRESIDENT

JENNIFER TAGGART

JUANITA TATE

KIM THOMPSON

May 6, 2003

Mr. Eric Cruse  
P.O. Box 16749  
North Hollywood, CA 91615-6479

Re: Complaint, Bradley Landfill

Dear Mr. Cruse:

Attached for your information is the report resulting from the investigation that the Local Enforcement Agency (LEA) conducted in response to your complaint.

We appreciate your interest in preserving the quality of life in Sun Valley. If you have any future complaints about a solid waste facility under the LEA's jurisdiction, please contact Martin Rosen, of my staff, at (213) 978-0867, or the LEA at (213) 978-0892.

Sincerely,

Vivian Marquez  
Program Supervisor  
Local Enforcement Agency

Attachment

cc: Jim Burkhardt, Mayor's Office



## Bradley Landfill Investigation Report

Facility Type: **Class III, MSW Landfill**  
Address: **9081 Tujunga Ave, Sun Valley, CA**  
Contact: **Bruce Matlock, Health & Safety Supervisor**  
Inspector: **Martin Rosen, Senior LEA Inspector**  
Report Date: **May 1, 2003**

The City of Los Angeles, Local Enforcement Agency (LEA) conducted an inspection of Bradley Landfill on 4/21/03. As part of the inspection a detailed investigation was conducted of any Bradley Landfill after hour operations that have occurred in the last several months. This investigation was in response to a call made to the LEA that Bradley Landfill was accepting waste at 2:00 a.m. and all hours of the night. I met with the operator to discuss the issue. The owner/operator of Bradley Landfill is Waste Management Inc. (WMI).

Bradley staff assured me that waste is not and never has been accepted by the landfill past 8:00 p.m. or before 6:00 a.m. in accordance with their permit conditions. Staff pointed out that they were permitted to take 10,000 tons per day (tpd), but currently were only taking 2,000 tpd. Bradley staff said there would be no need to violate this permit condition. Here is a detailed break down of operations and after hour landfill activities according Bradley Landfill staff.

1. 6:00 p.m. - Bradley Landfill closes their gate and stops accepting trash.
2. 6:00 p.m. - 8:00 p.m. - Bradley Landfill applies compacted dirt or approved ADC material to the working face and closes everything down.
3. 8:00 p.m. - 11:45 p.m. - Bradley Landfill mechanics conduct minor maintenance activities to heavy equipment, adjacent to the working face area. These activities include checking fluids, fueling, blowing out dirt and litter with air compressor, and window cleaning.
4. WMI also owns and operates a large vehicle collection yard and maintenance shop adjacent to Bradley Landfill. Bradley staff stated that the vehicle maintenance shop operates until approximately 2:00 a.m. on most weeknights. The shop routinely conducts testing of the engines, vehicle brakes and other activities related to vehicle maintenance and repair. The testing of vehicles occurs in the parking lot adjacent to the maintenance shop.

The maintenance shop and parking lot are not located within the permitted boundary of the landfill and the maintenance activities conducted are consistent with the manufacturing zone that it is located. Through this investigation, we could find no evidence of any violations of the permit.

*Martin Rosen (5-1-03)*

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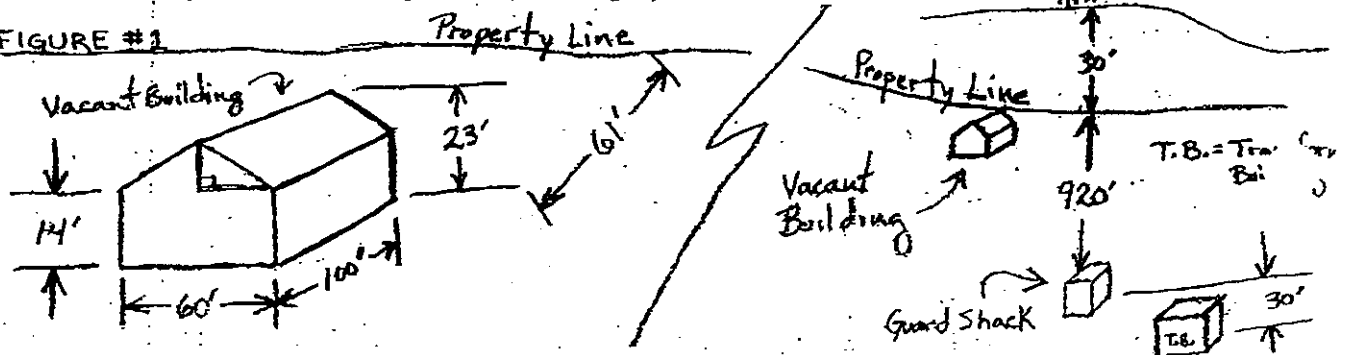
Martin Rosen  
Senior Inspector  
Local Enforcement Agency

# BRADLEY LANDFILL PUBLIC SCOPING MEETING QUESTIONS

Prepared by ERIC CRUSE  
4/24/03

- 1) If Bradley Landfill can not produce Derived Air Concentration or DAC levels which are derived by the United States Nuclear Regulatory Commission to limit the control of chronic occupational exposures to inhalation of Radioactive Materials; How is it that Kathleen Kaufman at the Los Angeles County Radiation Management office, Vivian Marquez and Wayne Sutz at the Los Angeles City of Environmental Affairs whom gives Bradley and Waste Management their permits to dump as well as Mayor Hahn and his lead man James Burkhardt, State Senators Gloria Romero and Richard Alacon, City Planning Department Director Con Howe, State Assembly Member Cindy Montinez, City Planner and Project Coordinator of EIR Jimmy Ljo, Council President Alex Padilla, Council Person/Member Janice Hahn, Council person Nate Holden, Council Person Ruth Jalenter, Council Person Tony *repeal elect* Cardenas, Council Person Wendy Gruel **CAN NOT DO THEIR JOBS AND STOP THE BRADLEY LANDFILL COLD IN ITS TRACKS!?!?** *Liaison* *Edwards*
- 2) Why is it that Vivian Marquez and Wayne Sutz at the Los Angeles City of Environmental Affairs whom gives Bradley Landfill their permits to dump, have not yet gotten back to me with a 24 hour 7 days a week pager number for the neighbors of the Bradley Landfill to call when they witness as I did on April 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup> and 7<sup>th</sup> as they DUMPED NEW GARBAGE WITH A CONVOY OF DIPSY DUMPSTER TYPE COMPACTOR TRUCKS from approximately 11pm to 3am in the morning? NOW THIS IS BEYOND THEIR PERMIT HOURS AND IT IS AGAINST THE LAW... SO WHY HAS THEIR PERMIT NOT BEEN PULLED YET!?! That was 3 weeks ago tomorrow and I have witnesses!
- 3) Deals with hazardous levels of Methane gas and Subsurface Migration which is the underground movement of highly explosive Methane gas and how Bradley doesn't seem to give a damn about the safety of the people living and working next door to them considering they don't have the proper Subsurface Migration Liners which is REQUIRED BY FEDERAL LAW by the RESOURCE CONSERVATION AND RECOVERY ACT which began REQUIRING ALL NEW AND EXPANDED LANDFILLS TO BE PROPERLY LINED AS OF OCTOBER 9, 1993. THIS DECREASES THE LIKELYHOOD OF CAUSING SERIOUS INJURY, PROPERTY DAMAGE, FIRES, EXPLOSIONS AND DEATH on your neighbors' property... SCREW YOUR PROPERTY WHAT ABOUT US!?! WHAT ABOUT THE DWP POWER PLANT ACROSS THE STREET? Did you realize Methane can migrate up to 1000 feet underground!?! Did you realize you are 920 feet from the Guard Shack at DWP!?! I measured it with a 100 foot tape measure! Do you realize that with your access road to the bottom of your hill you add approximately only 30 feet! That's 950 feet! Do you realize that the ENCLOSED TRANSFORMER BUILDING that is no more than 30 feet from the Guard Shack is only 980 feet from your LANDFILL!?! And how about the 2 vacant buildings that used to be a company called "Resets." The one I measured is 60 feet by 100 feet with a low ceiling height of 14 feet and a peak of 23 feet. THAT MEANS THAT 11,000 CUBIC FEET OF NON-VENTILATED SPACE SITS 61 FEET FROM YOUR PROPERTY LINE PLUS ABOUT 30 FEET FOR YOUR ACCESS ROAD AND THEN THE BOTTOM OF YOUR GARBAGE HEAP!!! OH BY THE WAY... MULTIPLY THAT BY 2 DUE TO THE SECOND BUILDING RIGHT NEXT TO THE FIRST WITH APPROXIMATELY THE SAME CUBIC FEET OF POTENTIAL ENCLOSURE SPACE!!! (FIGURE # 1 accompanies question # 3)
- 4) NMOC's (Non Methane Organic Compounds), HAP's (Hazardous Air Pollutants), VOC's (Volatile Organic Compounds) are at levels that you can't control already... anyone who has been any where near your dump can smell that, so how do plan to control them in the future as you continue to peel back the dirt which does not always have a "liner" as you "reconform" the garbage already on the property and add literally tons of new garbage!?! By the way "anyone who can smell the dump" includes the "Air Quality Management District" you know the government agency which slaps you with fines every time they smell and verify these poisons you are releasing into the City of Sun Valley!!! When can the people of Sun Valley expect to stop being held hostage, terrorized, poisoned and possibly killed by your company!?! Wait a minute maybe we can get Bush and the Department of Homeland Security to start an investigation on your company... as an "axis of evil!!"

FIGURE #1



05/13/2003 07:44

818767806969

VIRANIA BECK

PAGE 01

May 14, 2003

Jimmy Linoz, Project Coordinator  
 Department of Planning  
 200 N. Spring Street Ste 763  
 Los Angeles, Ca 90012  
 FAX 213-978-1343

Re: ENV-2001-3267: EIR-SCH No. 2001121027/April 24, 2004 Scooping Meeting

Dear Mr. Linoz:

I am a concerned citizen who would like to go on record as being opposed to the granting of any permit that would allow Waste Management, Inc. to continue to expand it's operations at Bradley Landfill in San Valley, or allow a Material Recovery Facility (MRF) or transfer station. Waste Management is asking to operate from 6:00 AM to midnight - - - - FOREVER!

Since the 1950's my community has been home to 17 landfills. Bradley Landfill, in particular, has had significant impacts on the community, from declined property values, to air pollution, aesthetic nuisances and heavy truck traffic near residential areas. By their own admission, truck traffic would triple.

I urge you to please considered this matter thoroughly and put yourself in our place when making your decision.

Sincerely,

Name: Kate Beck (Kate Beck)  
 Address: 11256 Neenach St  
San Valley, Ca 91352  
 Phone: 818-767-7167

cc: Con Howe, Director  
 Department of Planning  
 200 N. Spring St. Ste 525  
 Los Angeles, Ca 90012  
 FAX 213-978-1275

State Assemblymember Cindy Montanuz  
 11541 Laurel Canyon Blvd. Ste C & D  
 Mission Hills, Ca 91345  
 Fax 818-838-3931

State Senator Richard Alarcon  
 State Capitol - Room 4035  
 Sacramento, Ca 95814  
 FAX 818-901-5562

State Assemblyman Keith Richman  
 State Capitol  
 Sacramento, Ca 95814 - FAX 916-319-3138

May 14, 2003

Jimmy Liao, Project Coordinator  
Department of Planning  
200 N. Spring Street Ste 763  
Los Angeles, ca 90012  
FAX 213-978-1343

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I urge you to please considered this matter thoroughly and put yourself in our place when making your decision.

Sincerely,

Name: Virginia Beck  
Address: 1756 NEENACH ST  
SUN VALLEY, CA 91352  
Phone: 818-967-7169

cc: Con Howe, Director  
Department of Planning  
200 N. Spring St. Ste 525  
Los Angeles, Ca 90012  
FAX 213-978-1275

State Assemblymember Cindy Montanez  
11541 Laurel Canyon Blvd. Ste C & D  
Mission Hills, Ca 91345  
Fax 818-838-3931

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May 14, 2003

Jimmy Lino, Project Coordinator  
Department of Planning  
200 N. Spring Street Ste 763  
Los Angeles, ca 90012  
FAX 213-978-1343

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Sincerely,

Name:

Address:

Phone:

cc: Con Howe, Director  
Department of Planning  
200 N. Spring St. Ste 525  
Los Angeles, Ca 90012  
FAX 213-978-1275

State Assemblymember Cindy Montanez  
11541 Laurel Canyon Blvd. Ste C & D  
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May 14, 2003

Jimmy Linos, Project Coordinator  
 Department of Planning  
 200 N. Spring Street Ste 763  
 Los Angeles, CA 90012  
 FAX 213-978-1343

Re: ENV-2001-3267-EIR-SCH No. 2001121027/April 24, 2004 Scoping Meeting

Dear Mr. Linos:

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I urge you to please consider this matter thoroughly and put yourself in our place when making your decision.

Sincerely,

Name: Francis Beck  
 Address: 11956 Maerck St  
Sun Valley Ca - 91353  
 Phone: 818-769-7109

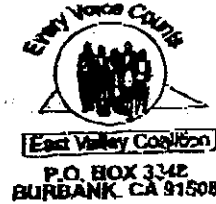
cc: Con Hows, Director  
 Department of Planning  
 200 N. Spring St. Ste 525  
 Los Angeles, Ca 90012  
 FAX 213-978-1275

State Assemblymember Cindy Montanez  
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State Assemblyman Keith Richman  
 State Capitol  
 Sacramento, Ca 95814 - FAX 916-319-3138



Date 5-22-03EIR No. ENV-2001-3267-EIR  
SCH No.: 2002121027Dear Jimmy Liao;

I Jerry Piro am a concerned citizen who would like to go on record as being opposed to the granting of any permit that would allow Waste Management Inc., to continue to expand its operations at Bradley Landfill in Sun Valley, or allow a MRF or transfer station. They are asking to operate from 6:00am to midnight ----FOREVER!

Since the 1950s my community has been home to 17 landfills. Bradley Landfill in particular has had significant impacts on the community ranging from declined property values, to air pollution, aesthetic nuisances (i.e., the mountain of trash), and heavy truck traffic near residential areas, just to name a few. By their own admission, heavy truck traffic would triple. Please do not grant them any more intrusions upon our community.

Thank you for your time and consideration to this very important letter.

Sincerely,

Name Jerry Piro  
Address 8600 ROBERT DR.  
SUN VALLEY, CA 91352  
Phone (818) 767-8677

ENOUGH IS ENOUGH!

P.S.  
The enclosed article enclosed is just one more reason regarding dumps, transfer stations shouldn't be surrounded by homes, schools and churches.

# Air Particles Linked to Cell Damage

An L.A.-area study finds the tiniest pollutants disrupt basic cellular functions, likely causing a host of diseases.

By GARY POLAKOVIC

Times Staff Writer

LA Times 4-7-02

A team of Southern California researchers has discovered that microscopic airborne particles can disrupt the inner mechanics of cells, offering a possible explanation of how air pollutants common in urban haze can harm the human body.

The new study, led by scientists at UCLA and USC, links the most minuscule particles found in dust and smoke to injuries. The particles are so small — about 1,000 could fit inside the period at the end of this sentence — that they easily bypass the body's defense mechanisms.

The findings also are the first to show that very tiny particles travel beyond the lungs and bloodstream to penetrate deep inside cells. The pollutant accumulates within a critical component that powers the cell and maintains its function. Damage to that cellular component is known to lead to an assortment of diseases.

The study is scheduled to be published this week in the journal *Environmental Health Perspectives*, a publication of the National Institute of Environmental Health Sciences, and is currently available on the journal's Internet home page.

Researchers have long known that haze over major cities causes a wide range of health problems. Numerous studies worldwide have linked particle pollution to school absences, hospital admissions, shortened life spans, reduced lung function, heart disease and cancer. The U.S. Environmental Protection Agency established rigorous standards for curbing particle pollution in 1997. The agency estimated that those rules will prevent 15,000 premature deaths, 250,000 cases of asthma and 1 million cases of lung problems in children by the year 2020.

But researchers have been unsure what types of particles were to blame for the health ef-

fects.

"We have had no idea of the biological potency of different size particles in the air," said UCLA researcher Andre Nel, a physician and lead author of the study. The new research "may be a mechanism to explain how the smallest particles cause adverse health effects," he said.

Particulate matter turns the sky gray with gauzy haze, limiting visibility. It consists of microscopic bits, ranging from pulverized tire fragments to dried soot to acid droplets, and is measured in microns, a unit equivalent to a millionth of a meter. A human hair is about 50 microns across.

Currently, environmental regulations try to limit particles that are 10 microns in diameter and smaller particles in the 2.5-

(See Particles, Page B8)

# Research Links Tiniest Particulate Matter in the Air to Damaged Cells in Humans

4-7-02 L.A. Times

[Particles, from Page B1] (8-6) micron range. But the particles that caused the most damage in the new study are one-tenth of a micron across.

Dust and smoke are made of particles of about 10 microns. The smallest particles come mainly from burning fossil fuels. These tiny particles float in the air longer, travel farther and are more easily inhaled than larger ones.

The Los Angeles Basin ranks as one of the worst places in the nation for particle pollution. The highest concentrations typically occur in western Riverside County. But the Los Angeles-Long Beach area has more of the tiny particles emitted by vehicle exhaust. Using the region as a laboratory, the EPA established one of five national particle-pollution research centers at UCLA, which produced the latest study.

In their study, the team of 18 scientists collected particles in various sizes from air above Claremont and the USC campus near downtown Los Angeles between November 2001 and March 2002. The pollution was concentrated, put into solution and added to two types of cells.

One group of cells included macrophages taken from mice. A macrophage is a type of cell that scavenges and destroys foreign matter in the lung and other organs. The other cells were taken from the lining deep inside a human lung. The scientists then measured chemical reactions in the tissues and examined the cells with an electron microscope.

The researchers found that when the particles come in contact with the cells, they trigger a reaction that causes inflammation. That may help explain how particle pollution exacerbates asthma, an inflammation of the airways, Nel explained.

Deeper inside the cells, researchers found that the one-tenth-of-a-micron particles ac-

cumulated inside cell structures called mitochondria. Oblong in shape, mitochondria are the workhorses of cells. They combine sugar and oxygen to produce the fuel that keeps cells running.

The study shows that the pollution damaged the shape of mitochondria, causing them to stop producing the cellular fuel and start producing other chemicals, which lead to more inflammation and cell damage.

Melanie Marty, chief of air toxicology and epidemiology at the California Office of Environmental Health Hazard Assessment, said the findings highlight the danger of the smallest particles, which have not been the focus of regulations of air pollution. She did not work on the research, but is familiar with the paper.

"The mitochondria of a cell is like a cell's battery. Once you damage the mitochondria, you're going to kill the cell," Marty said. "This shows the ultra-fine particles are better at causing damage, and we should be paying more attention to ultra-fine particles because of their

toxicity and ability to produce this stress in the cell."

The study comes with some limitations. Scientists examined pollutants at just two locations in the Los Angeles region. Particle pollution varies by concentration and type across cities.

Also, the pollution that the cells were exposed to in the study is more concentrated than what is typically found in ambient air. The researchers cautioned that their observations come from the laboratory and that more studies are needed to see if similar results occur in people or animals exposed to less concentrated pollution.

Fernando Soagles, a professor in the department of molecular and human genetics at Baylor College of Medicine in Houston who has read the paper, said damage to mitochondria in cells can lead to various diseases, including Parkinson's and Alzheimer's, as well as strokes and other neurological impairment. Damage to mitochondria, he said, can increase over time as cells divide, leading to a breakdown of cell functions and early onset of disease.

*Jerry*  
East Valley Coalition

05/22/2003 THU 10:20 FAX 7569270

001/003

## Facsimile

**FAX TO:** Mr. Jimmy Liao, Department of Planning  
(213) 978-1343  
**FROM:** Gliceria Padilla, Sun Valley Resident  
**RE:** Bradley Landfill Expansion Project Proposal EIR  
**DATE:** May 22, 2003

Mr. Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Ste. 763  
Los Angeles, CA 90012

Dear Mr. Liao,

My family and I have lived at 8700 Norris Ave., Sun Valley, 91352 since 1995. Never did we think about the problem we are facing now, when we purchased our home. I address you in this letter in regards to the Environmental Impact Report your department is preparing for Waste Management's (WM) proposal to expand the mountain of trash at Bradley Landfill 43 ft. higher and to permanently install a trash transfer station and recycling type of facility at Bradley (ENV - 2001 - 3267 - EIR: SCH NO: 202121027). I would like for you to direct your department to answer the following questions in this EIR, which stem from great concern and opposition to these projects.

### Aesthetics

The current mountain of trash stands at 1,000 ft. high and is an eye sore. A 43ft. expansion would exacerbate this aesthetic nuisance. How does WM or the City plan to alleviate this visual blight? Are there any trees planted at the foot of this mountain to help mitigate this sight? Also, if there's going to be more trash coming into Bradley, that means more trash on our streets which already look like they're part of the dump because they're lined with trash. The trash gets there because it flies off of the trash trucks on their way to Bradley. How does WM control trash from flying away from its property and on to public streets? How does WM control trash from flying off its trucks? Does WM offer incentives to trash hauling contractors who are environmentally conscious and practice such precautions? How often does the City clean and sweep the streets that are most often used as routes to and from Bradley within a 3-mile radius? Please conduct a study to see which are the streets most often used on a daily basis by independent trash hauling trucks and WM trucks to get to and from Bradley landfill. How often have those streets been repaved in the past? How many trees will be planted on those streets to help improve aesthetics and air quality? Please include the negative cumulative impacts that would include a transfer station, material recovery facility, and a 43 ft. trash expansion. Please study how much trash ends up on these frequently used routes within a 3-mile radius of Bradley, and how often these routes currently get cleaned and swept by the City. How much more trash would end up on those streets as a result of the trash hauling trucks going to and from Bradley?

### Air Quality

What is currently being used as a daily cover for trash on a daily basis? What was used before? What gases and smells permeate into the air? How do they negatively affect air quality? How has bad air

05/22/2003 THU 10:20 FAX 7569270

003/003

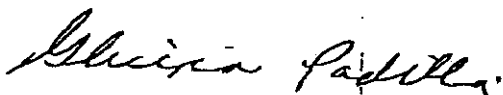
to reduce the center's trash intake? Will this plan have any effects on the Sun Valley community and neighboring communities?

Transportation/Traffic

Trash and hauling trucks getting off the 5Fwy at Penrose St. cause traffic jams Bradley St. and Penrose St. Penrose is a major thoroughfare to get to an adjacent residential neighborhood, shopping center, and super market. In addition, the Fire Fighters at the Station on Glenoaks and Penrose use this street; these traffic jams can cost someone their life in the case of an emergency. Please consider this as a cumulative impact in your traffic survey studies. In addition, please study how many trucks will be going in and out of Bradley landfill on a daily basis during operating hours and how this traffic will affect residences and local businesses? How many of those are WM trash trucks and how many are 18 wheelers/flatbeds? How will this traffic affect traffic from residential areas, shopping areas, business and commercial areas, and health care facilities nearby?

I hope that you will consider all the questions my family and I have come up with to be answered in this EIR. This is a huge project and we've considered many things. We hope that through this study the City will realize that this is not a positive project and that it only degrades the quality of life of a hardworking community. Thank you for your time and consideration.

Sincerely,



Gliceria Padilla  
8700 Norris Ave.  
Sun Valley, CA 91352

Yahoo! Mail - jesolano9001@yahoo.com

Jimmy Liaos, Project Coordinator  
Department of City Planning  
200 No. Spring Street - Suite 763  
Los Angeles, Ca 90012

REF: Bradley Landfill ENV-2001-3267-EIR SCH NO. 2001121027

Dear Mr. Liaos:


I am a concerned (homeowner/business owner/citizen) who would like voice my objection to the above application.

We already are living with a mountain of trash. Another 43 feet would be a significant impact on any aesthetic views of the mountains and forever mark Sun Valley's image as the trash capital of California. There are the home of some 17 landfills. This alone has had a significant impact on our property values. Bradley Landfill is already polluting our air and the higher up they go, the worse it will get.

Along with this 43 foot extension, we have been asked to accept a Material Recycling Facility or Trash Transfer Facility. We have been dumped on enough! This facility will continue to increase the heavy truck traffic in Sun Valley along with pollution and the Bradley Landfill site will forever be a living reminder of a mountain of trash. This trash will be transferred by rail. This will create more traffic congestion as we will now have more train activity. Rail cars park along San Fernando Road and another great aesthetic view of cranes loading the rail cars with trash.

Enough is enough. Please consider the children, residents, business owners and people working in this area who are directly impacted by this already existing mountain of rubbish.

Sincerely,



JOSE E SOLANO  
9001 HADDON AV.  
SUN VALLEY CA 91352  
TEL - 768-1812



All Properties, Inc.  
10180 Reseda Boulevard  
Northridge, California 91324  
(818) 888-9121 Office  
(818) 886-8851 Fax

FACSIMILE TRANSMISSION COVER SHEET

DATE

5-27-03

TO

Mr. Liass

FAX NUMBER

1213-978-1343

REGARDING

Bradley Landfill

DOCUMENT(S)

NUMBER OF PAGES  
(including Cover Sheet) :

2

COMMENTS

Enough is enough.

Mary C. Neugebauer

IF THERE ARE ANY PROBLEMS, PLEASE CALL (818) 888-9121

Each Office is Independently Owned and Operated

May 21, 2003

Jimmy Liao, Project Coordinator  
Department of City Planning  
200 No. Spring Street - Suite 763  
Los Angeles, Ca 90012

REF: Bradley Landfill ENV-2001-3267-EIR SCH NO. 2001121027

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Sincerely,

*Mary C Neugebauer*



**REMY, THOMAS, MOOSE and MANLEY, LLP**  
ATTORNEYS AT LAW

MICHAEL H. REMY  
1944 - 2003

TINA A. THOMAS  
JAMES G. MOOSE  
WHITMAN F. MANLEY  
ANDREA A. MATARAZZO

BRIAN J. PLANT  
OF COUNSEL

455 CAPITOL MALL, SUITE 210  
SACRAMENTO, CALIFORNIA 95814

Telephone: (916) 443-2745  
Facsimile: (916) 443-9017  
E-mail: info@rtnmlaw.com  
http://www.rtnmlaw.com

OSHA R. MESERVE  
JENNIFER S. HOLMAN  
ANDREA K. LEISY  
TIFFANY K. WRIGHT  
WILLIAM C. BURKE  
CHRISTOPHER H. CALFEE  
ASHLE T. CROCKER  
MARY E. HANDEL  
SABRINA V. TELLER  
DIANA L. RACHAL

**TELECOPY TRANSMISSION**

TO: Jimmy Liao

FAX NUMBER: (213) 978-1343

FROM: Andee Leisy

DATE TRANSMITTED: May 23, 2003 TIME TRANSMITTED: 9:08 AM

WE ARE SENDING 14 PAGES, INCLUDING COVER SHEET.

CASE NO: 124 CASE NAME: WM/Bradley

MATERIAL SENT: Letter Dated May 23, 2003, re: Notice of Preparation ("NOP") of an Environmental Impact Report for the Bradley Landfill and Recycling Center Transition Master Plan (SCH No. 2002121027).

**COMMENTS**

Please see attached.

ORIGINAL WILL FOLLOW BY GUARANTEED OVERNIGHT MAIL NO

ORIGINAL WILL FOLLOW BY REGULAR MAIL NO

**\*\*WARNING TO RECIPIENT\*\***

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS CONFIDENTIAL INFORMATION AND MAY BE ATTORNEY/CLIENT PRIVILEGED. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL (916) 443-2745

FOR REMY, THOMAS, MOOSE AND MANLEY, LLP USE ONLY

DATE:

TIME:

INITIALS:

**REMY, THOMAS, MOOSE and MANLEY, LLP**  
ATTORNEYS AT LAW

MICHAEL H. REMY  
1944 - 2003

TINA A. THOMAS  
JAMES G. MOOSE  
WHITMAN F. MANLEY  
ANDREA A. MATARAZZO

BRIAN J. PLANT  
OF COUNSEL

455 CAPITOL MALL, SUITE 210  
SACRAMENTO, CALIFORNIA 95814

Telephone: (916) 443-2745  
Facsimile: (916) 443-9017  
E-mail: info@rtmnlaw.com  
http://www.rtmnlaw.com

OSHA R. MESERVE  
JENNIFER S. HOLMAN  
ANDREA K. LEISY  
TIFFANY K. WRIGHT  
WILLIAM C. BURKE  
CHRISTOPHER H. CALFEE  
ASHLE T. CROCKER  
MARY E. HANDEL  
SABRINA V. TELLER  
DIANA L. RACHAL

May 23, 2003

**VIA FACSIMILE (w/o Attachments)**  
**& REGULAR MAIL**  
**(213) 978-1343**

Jimmy Liao, Project Coordinator  
Environmental Review Section  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Re: Notice of Preparation ("NOP") of an Environmental Impact Report for the  
Bradley Landfill and Recycling Center Transition Master Plan (SCH No.  
2002121027).

Dear Mr. Liao:

We submit the following comments regarding the scope of the Environmental Impact Report ("EIR") being prepared by the City of Los Angeles (the "City"), and Christopher A. Joseph & Associates, pursuant to the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 21000 et seq.), for the Bradley Landfill and Recycling Center ("BLRC") Transition Master Plan ("TMP" or the "Project"). We submit these comments on behalf of Waste Management Recycling & Disposal Services of California, Inc. ("WM"), the owner and operator of BLRC. As a preliminary matter, please add my name to your mailing list for any future public notices issued in connection with this project.

**1. CEQA Requires The DEIR To Include A Reasonable Range Of Alternatives.**

In preparing the DEIR, we urge the City to consider a range of alternatives to the proposed project. Under CEQA, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines, §§ 15126.6, subd. (a).) It must contain "sufficient

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information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." (CEQA Guidelines, §§ 15126.6, subd. (d).) "The statutory requirements for consideration of alternatives must be judged against a rule of reason." (*Association of Irrigated Residents v. County of Madera* (2003) 2003 Cal. App. LEXIS 594 [\*30], citing *Foundation for San Francisco's Architectural Heritage v. City and County of San Francisco* (1980) 106 Cal. App. 3d 893, 910.) The range of feasible alternatives must be selected and discussed in a manner that fosters meaningful public participation and informed decision making. (CEQA Guidelines, § 15126.6, subd. (f).) We therefore request that the City consider including the following alternatives in the DEIR.<sup>1</sup>

a. **Reduced Intensity Alternative.**

The DEIR should include a reduced intensity alternative that considers: (1) a reduced vertical expansion, from the proposed 43' (Phase I), and the Transfer Station/Materials Recovery Facility ("TS/MRF") (Phase II) as proposed; and/or (2) the vertical expansion as proposed and a reduced TS/MRF.

In order to consider the possibility of avoiding or substantially lessening otherwise potentially significant aesthetic, air quality, and/or traffic impacts, a reduced vertical expansion alternative could, for example, consider decreasing Phase I by 25, 33 or 50 percent (e.g., by approximately 10, 14 or 21.5 feet). A 33 percent reduction in the amount of waste processed at the TS/MRF could also be included (e.g., a TS that accepts 4,000 tons per day (tpd<sup>2</sup>) versus the proposed 6,000 tpd).

To be complete, however, the DEIR must also consider any potentially significant adverse traffic and air quality impacts that could result from having to haul the unaccounted for waste by truck or rail to other transfer stations or landfill sites under this alternative.<sup>2</sup> (CEQA Guidelines, § 15126.6, subd. (d) ("[i]f an alternative would cause

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<sup>1/</sup> For each alternative considered in the DEIR there should also be a corresponding analysis of the City's ability, or inability, to meet the 50% waste reduction requirement mandated by state law pursuant to the Integrated Waste Management Act of 1989 (AB 939). For context, the DEIR should also explain the current status of the City's efforts to meet this requirement.

<sup>2/</sup> To the extent feasible, the DEIR should consider the potential effects of the reduced intensity alternative to the surrounding community from generating fewer host fees, tipping fees and/or mitigation measures that would otherwise go to community

(continued...)

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one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed<sup>2/</sup>.) If other alternatives such as waste-to-energy, incineration and/or other emerging technologies would be used to process the unaccounted for waste, the DEIR should also, to the extent feasible, contemplate the effects of those options.

**b. Phase II Only Alternative.**

An alternative that considers implementing only Phase II (TS/MRF) of the project, with no vertical expansion, should also be included in the DEIR. If, however, the City determines that this alternative would not feasibly attain most of the basic objectives of the project, the DEIR may exclude the alternative from its analysis after explaining the reasons for doing so. (CEQA Guidelines, § 15126.6, subds. (c), (f); see also *Laurel Heights Improvement Assoc. v. Regents of the University of California* (1988) 47 Cal.3d 376, 404-405 ("*Laurel Heights I*").)

If a Phase II only alternative is considered, the DEIR should also discuss the potentially significant impacts, including air quality and traffic impacts, that would result from otherwise having to haul the estimated 4.7 million cubic yards ("mcy") of municipal solid waste (Phase I) out of the City for disposal at other active landfills. (CEQA Guidelines, § 15126.6, subd. (d).)

**c. Feasible Off-Site Alternatives.**

If there are any feasible off-site alternatives within the City limits that would accommodate the proposed land-uses, including the TS/MRF, the DEIR should consider those sites. (See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 572-574 ("*Goleta II*").) If off-site alternatives are deemed infeasible, the DEIR should explain the basis for the determination and terminate the discussion. (CEQA Guidelines, § 15126.6, subd. (f)(2)(B); see also *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1751-1754 (upholding EIR for senior housing development despite the failure to address any off-site alternatives in detail); *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 744-745 (upholding alternatives analysis of EIR for the Long Beach port master plan, in part, because the general plan designated port uses as the preferred land uses within the Port area).)

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<sup>2/</sup> (...continued)  
improvement projects.

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If a proposed off-site alternative is deemed feasible, and found to avoid or substantially lessen any of the significant effects of the proposed project, the DEIR should discuss the potentially significant environmental effects of the alternative that may result, including traffic and air quality impacts. (CEQA Guidelines, § 15126.6, subds. (d), (f)(2).) Disposing of municipal solid waste at an off-site facility, and the resulting closure of BLRC, could also result in neighborhood blight as explained below.

**d. "No Project" Alternative.**

The DEIR must also include analysis of a "no project" alternative. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the project. (CEQA Guidelines, § 15126.6, subd. (e)(1).) Lead agencies analyze the impacts of a no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. (CEQA Guidelines, § 15126.6, subd. (e)(3)(C).)

Here, the analysis of the no project alternative should include the potentially significant adverse environmental impacts that would likely result if BLRC were forced to stop operating. Potentially significant impacts such as air quality, traffic and neighborhood blight, could result from having to transport municipal solid waste to other active landfills. The DEIR should also consider the potential local and regional effects to air quality and traffic if the expansion of Sunshine Canyon Landfill is not approved, and the City is forced to transport waste long distances for disposal via truck or rail.<sup>3</sup> If waste were to otherwise be incinerated or disposed of by other emerging technologies, the DEIR should also consider the potentially significant environmental effects of those options, if any.

Lastly, and considering the City's historical problems with illegal dumping in the area, the no project alternative should contemplate whether closing BLRC will result in an increase in illegal dumping. (See Reporter's Transcript, Public Scoping Meeting for Environmental Issues (April 24, 2003) ("Transcript"), at pp. 16-17, 61.) The DEIR should also consider, given the limited number of immediate options for waste transfer

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<sup>3/</sup> Relatedly, the DEIR should grapple with the reality that disposal of the City's municipal solid waste via a long-haul rail option is at least 5-10 years away and will likely be three times as costly. Because there are few immediate solutions to the City's waste disposal needs, the benefits of the proposed project to area residents and businesses must be considered in the DEIR.

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and disposal services within the City, that even a temporary disruption in service could result in residents and businesses engaging in illegal dumping, or trash emergencies whereby local pick-up at residential and commercial accounts would be delayed or interrupted.

**2. CEQA Requires The City To Consider The Reasonably Foreseeable Indirect Environmental Impacts Of The No Project Alternative.**

Although, as a general rule, the economic and social changes resulting from a project are not treated as significant effects on the environment, CEQA requires an EIR to address the economic and social changes of a project if indirect environmental impacts are reasonably foreseeable.<sup>4</sup> An indirect physical change in the environment is one that is not immediately related to the project, but that is nevertheless caused by the project. (CEQA Guidelines, § 15064, subd. (d)(2).) CEQA requires consideration of indirect physical changes if they are reasonably likely to occur. (CEQA Guidelines, § 15064, subd. (d)(3); see also *County of Inyo, supra*, 172 Cal.App.3d at p. 170 (A "lead agency shall consider the secondary or indirect environmental consequences of economic and social changes, but may find them to be insignificant")<sup>5</sup>)

In *Citizens for Quality Growth v. City of Mount Shasta, supra*, 198 Cal.App.3d at pp. 445-447, for example, the court invalidated an EIR because the lead agency failed to determine whether the economic and social effects of the proposed project (a new shopping center) would lead to adverse environmental impacts on the downtown area. (*Id.* at p. 447.) The court noted that "[a]n identical dispute was raised in [*County of Inyo*], in which the court held . . . that subdivision (f) [of CEQA Guidelines, § 15064] 'expressly gives the agency discretion to determine whether the consequences of economic and social changes are significant, which is not the same as discretion to not consider these consequences at all.'" (*Citizens for Quality Growth, supra*, 198

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<sup>4</sup> See CEQA Guidelines, §§ 15064, subd. (d)(2), 15131, subd. (a); see also *Kings County Farm Bureau et al. v. City of Hanford* (1990) 221 Cal.App.3d 692, 721; *Citizens for Quality Growth et al. v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 445-446; *Citizens Association for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 170.

<sup>5</sup> The DEIR, moreover, must reflect a good faith effort at full disclosure of the ensuing adverse environmental impacts to traffic and air quality if BLRC were forced to close. (CEQA Guidelines, § 15151.) The City must use "its best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines, § 15144 (italics added); see also CEQA Guidelines, § 15145.)

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Cal.App.3d at p. 446, quoting *County of Inyo, supra*, 172 Cal.App.3d at p. 170 (italics added).) Accordingly, under CEQA, the City has an obligation to consider the potentially significant adverse indirect effects of the no project alternative.

**a. The Direct And Indirect Fiscal Contributions Of WM, Through The Operation Of BLRC, Are Crucial To Both The City And Local Economies.**

In April of 2002, Economics Research Associates ("ERA") released a study evaluating the economic impact of annual operations at BLRC, including the Sun Valley Hauling Company. The study evaluated the likely economic, fiscal and employment impacts to the City, San Fernando Valley, Los Angeles County, and the region, if Phase I were approved and BLRC continued operating at or below currently permitted levels through April of 2007.<sup>6</sup> ERA found that in 2001, BLRC and the Sun Valley Hauling Company expended approximately \$58.48 million dollars in combined total operating costs. (Attachment A, at pp. I-5 to I-6.) In that same year, WM also spent approximately \$6.9 million dollars for goods and services in the City of Los Angeles and with local Sun Valley suppliers and vendors.

ERA also found that WM contributes, on average, over \$730,000 in fees and taxes to the City of Los Angeles general fund annually. (Attachment A, at p. I-7.) If the project is approved, BLRC would generate approximately \$3.66 million in general fund revenues over the life of the project. (*Id.*) Loss of those fees to the general fund would be especially significant given the dire economic climate, the City's draft budget which calls for significant fee hikes and service reductions in the City, and the fiscal reality that many basic City services could be cut.<sup>7</sup> (See Attachment A, at p. I-3.)

According to the California Employment Development Department, in April of 2003, Latinos experienced a 7.6% statewide unemployment rate, while the unemployment rate for Caucasians was 6.0%. (See [www.edd.ca.gov](http://www.edd.ca.gov).) The Northeast San Fernando Valley likely mirrors the disproportionately high rates of unemployment

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<sup>6</sup> A true and correct copy of that study is attached hereto as Attachment A, and is entitled "Economic and Fiscal Impact Analysis Waste Management Bradley Landfill and Recycling Center." The Study was also previously provided to the City by Cynthia Rodriguez at the Scoping Meeting of April 24, 2003.

<sup>7</sup> In fact, many basic City services are now being trimmed or eliminated. The Chief Legislative Analyst has also cautioned both the Mayor and the City Council that the City's budget deficit may run deeper than current projections.

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experienced by Latinos throughout California, in part, because Latinos make up a large part of the population in an area that historically experiences the highest levels of unemployment in the City. (See Attachment A; see also [www.edd.ca.gov](http://www.edd.ca.gov), [www.valleyofthestars.net](http://www.valleyofthestars.net).)

As mentioned by several commenters at the scoping hearing, and as described in the ERA study, unemployment levels in Northeast San Fernando Valley are among the highest in the City. (See Attachment A, at p. I-2.) Sun Valley, for example, has an unemployment rate of approximately 11.6%, nearly double the statewide average for Caucasians. Unemployment levels in Pacoima and Sylmar, moreover, are around 9.7 and 8.2% respectively. (See, e.g., Census 2000 files summary.) Overall, the unemployment rate in the Northeast San Fernando Valley is 9.5%.<sup>8</sup>

In direct contrast with these bleak unemployment numbers, WM provides steady employment to a large number of Latinos, and exclusively Spanish speaking employees, who make up the overwhelming majority of WM's approximately 200 member workforce. Unlike many of the companies that have historically done business within the Northeast San Fernando Valley, WM has remained a dependable employer for nearly 15 years to the benefit of its employees, the community and surrounding businesses. Consequently, residents of both the Valley and the City highly covet employment with WM because the jobs are reliable, predominantly union, and pay good wages and provide full benefits.

In 2001, the total payroll expenditure for BLRC was \$6.5 million dollars, of which \$4.3 million was paid to workers who are residents of the City of Los Angeles. (Attachment A, p. 1-6.) Approximately \$800,000 of the payroll disbursed was to residents of Sun Valley and Pacoima; thus, demonstrating that many WM employees actually live in and around the Landfill. (Attachment A, at p. I-6.) Given that Latinos already experience disproportionately high levels of statewide unemployment, the potential loss of jobs at BLRC, would likely exacerbate the unemployment rates for this ethnic group.

In February of 2003, Councilmember Ruth Galanter announced the establishment of a Community Advisory Committee (the "Committee") to further involve the local community, through appointed representatives, in operations at BLRC. WM has committed to provide \$500,000 to fund the operations of the Committee over a four year period. Committee members will, among other things, identify future uses of the site

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<sup>8</sup>/ For comparison purposes, the unemployment rate in the greater Los Angeles County area was approximately 6.3% in April of 2003. (See [www.edd.ca.gov](http://www.edd.ca.gov).)



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after closure of the landfill, recommend mitigation measures for the proposed project, and determine how any future host and/or tipping fees will be used to benefit the community. If the TS/MRF is not approved, however, the potential community enhancement fees will be lost.

**b. The Indirect Environmental Impacts Resulting From The Socio-Economic Effects Of The No Project Alternative Should Be Considered In The DEIR.**

As discussed above, CEQA requires consideration of the no project alternative and its potentially significant environmental impacts. (CEQA Guidelines, § 15126.6, subd. (e)(1).) As several commenters on the Initial Study noted, if the proposed project is not approved, potentially significant indirect environmental impacts could result from loss of jobs, local revenue and taxes. (See, e.g., Transcript, at pp. 28-29.) Specifically, potential environmental effects could result from neighborhood blight, a jobs/housing imbalance, and/or traffic and air quality impacts.

As noted above, WM is the main customer to many businesses in the area. If WM were to close, a domino effect could occur as several other local businesses could be forced to close, downsize, or relocate their businesses, upon losing WM as a customer. The closure of these businesses could, in turn, cause neighborhood blight and a decline in real estate values in Sun Valley as well as neighboring Sunland/Shadow Hills. Accordingly, the DEIR should consider the potential of the no project alternative to cause blight or exacerbate already blighted conditions. (See, e.g., *Citizens for Quality Growth, supra*, 198 Cal.App.3d at p. 446; see also *County of Inyo, supra*, 172 Cal.App.3d at p. 170.) The elimination of wages otherwise spent by WM employees in the area may also harm the local economy and result in blight.

Potentially significant traffic and air quality impacts may also result under the no project alternative as former WM employees would commute to jobs in outlying areas. An increase in commuters is a reasonably foreseeable impact of the no project alternative due, in part, to the unique circumstances surrounding BLRC and the lack of comparable jobs in the area. Thus, increasing unemployment levels are social and economic effects of the no project alternative that may result in adverse changes in the physical environment as people find work elsewhere. Thus, the social and economic aspects of the no project alternative should be considered in the DEIR. (CEQA Guidelines, §§ 15064, subd. (f), 15131, subd. (a).)

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3. **The City Should Use The Existing Permitted Levels Of Operation At BLRC As The Environmental Baseline Under CEQA.**

Several commenters at the April 24, 2003, scoping meeting requested that the DEIR consider any and all previously completed tests and historical documents relating to the landfill, surrounding power lines, factories, and the Burbank airport. (See Transcript, at pp. 18, 32, 37.) The inclusion of such a broad range of information is not required under CEQA for proper consideration of either the cumulative or direct impacts of the project.<sup>9</sup> (See, e.g., *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452 (preparation of an EIR is not the appropriate forum for determining the nature and consequences of prior actions).)<sup>10</sup>

Rather than explain the entire litany of historical permitting and environmental documents prepared for the site, the City should use the existing permitted levels of operation at BLRC as the environmental baseline from which to determine whether an impact is significant. (See e.g., *Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1280-1281 (upholding lead agency's discretion to establish the environmental baseline in an EIR for a use permit).)

In *Fairview Neighbors v. County of Ventura* (1999) 70 Cal.App.4th 238, the Second District Court of Appeal considered the adequacy of an EIR prepared for the expansion of an existing mining operation and a revised conditional use permit ("CUP"). The project site had been mined since 1948 and, although the 1976 CUP did not set a cap on truck trips, it did approve mining of 1,800,000 million tons of aggregate which the

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<sup>9</sup> The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. (CEQA Guidelines, § 15355, subd. (b).) "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness..." (CEQA Guidelines, § 15130, subd. (b); see also *Fairview Neighbors v. County of Ventura* (1999) 70 Cal.App.4th 238, 245.)

<sup>10</sup> See also *Association of Irrigated Residents v. County of Madera* (2003) 2003 Cal. App. LEXIS 594 [\*21-22] ("CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required," citing CEQA Guidelines, § 15204, subd. (a)).)

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County of Ventura, as the lead agency, found could generate 810 truck trips. (*Id.* at pp. 240-241.)

Petitioners claimed that the EIR arbitrarily and speculatively determined that the existing traffic limit was 810 truck trips, rather than the actual, existing traffic generated by the project. (*Id.* at p. 242.) The court rejected petitioner's claims and upheld the EIR's use of traffic generated when the mine operated at full capacity as the baseline. (*Id.* at pp. 242-243.) The court reasoned that: "[d]iscussing the possible environmental effects of the project based on actual traffic counts would have been misleading and illusory under the facts here. The flow of traffic for a mining operation fluctuates considerably based on need, capacity and other factors." (*Id.* at p. 243.) *Fairview Neighbors* remains good law.

As in *Fairview Neighbors*, the acceptance of municipal solid waste at BLRC fluctuates based on need, capacity and a variety of other factors. Accordingly, the environmental baseline should reflect landfill conditions as currently permitted and constructed to operate, including:

- a land use permit to operate until April of 2007;
- acceptance of up to 10,000 tpd of municipal solid waste, and including the average number of traffic trips generated when BLRC accepts 10,000 tpd;
- a landfill height of 1,010 above Mean Sea Level ("msl");
- a total landfill capacity of approximately 38.6 mcy; and
- hours of permitted operation from 6:00 a.m. to 8:00 p.m. Monday through Sunday, and twenty-four hours a day/seven days a week for receipt of clean soil and maintenance operations.

Framing the baseline conditions in this manner is consistent with CEQA and the prior environmental review documents prepared for the site. Using the permitted levels of operations, moreover, will avoid misleading the public and agency decisionmakers by properly characterizing the potentially significant impacts of the proposed project.<sup>11</sup>

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<sup>11/</sup> To properly characterize the project, the DEIR should also explain that if the proposed project were approved, only the maximum final peak of the landfill would reach 1,053 msl. After final settlement over time, the landfill would be significantly

(continued...)

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Lastly, by using the permitted levels of operations as the baseline, the City will also avoid impermissibly requiring additional mitigation for impacts generated by ongoing operations that were previously approved. WM has a vested right to continue operating until the landfill reaches 1,010 msl and approximately 38.6 mcy, or until April of 2007 when the local land use permit expires. In order for the City to impose mitigation measures, there must be an "essential nexus," or reasonable relationship, between the project's anticipated impacts and the required mitigation. (See *Nollan v. California Coastal Comm'n* (1987) 483 U.S. 825; see also, *Dolan v. City of Tigard* (1994) 512 U.S. 373; *Avco Community Developers, Inc. v. South Coast Regional Com.* (1976) 17 Cal.3d 785.) Thus, the City may only require mitigation for those aspects of the project that exceed prior approvals. Utilization of the permitted levels of operations as the baseline will avoid this potential pitfall.

**4. The Discussion Of Cumulative Impacts Must Include Similar Projects In The Area.**

"Cumulative impacts," under CEQA, refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (CEQA Guidelines, § 15355.) The DEIR's evaluation of cumulative impacts may be based on a list of past, present and probable future projects producing related impacts, including projects outside the City's control. (CEQA Guidelines, § 15130, subd. (b)(1).) Projects that have been approved or are under environmental review must be included in the analysis. (*San Franciscans for Reasonable Growth v. City & County of San Francisco* (1984) 151 Cal.App.3d 61; see also *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4<sup>th</sup> 98.)

The DEIR should therefore consider the effects of the proposed project in conjunction with a list of past, present and probable future projects. The list should include, for example, the recently approved City project to replace what is now known as the East Yard, and to be located on Pendleton Avenue. We understand that the project includes using the site for maintenance and storage of trucks used for waste disposal, recycling, and septic purposes.<sup>12</sup> Cumulative impacts to consider include, but are not

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<sup>11/</sup> (...continued)

lower. Thus, the DEIR should explain the anticipated levels of settlement at various points in the post-closure process.

<sup>12/</sup> Additional projects in the area include the Bureau of Sanitation (located at 11050  
(continued...))

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limited to, air quality, traffic, odor, and noise.

**5. The DEIR Should Include A Discussion Of Recent Leachate Sampling Results At Bradley.**

As part of the existing environment (i.e. the environmental setting), the DEIR should include a discussion of: (1) the January 2003, State Water Resources Control Board ("SWRCB") report entitled "Preliminary Results of Radioactivity Sampling at Landfills" ("SWRCB Preliminary Landfill Results"); (2) the January 15, 2003, report entitled "Results and Evaluation of Radiochemical Sampling at Six Waste Management, Inc., California Landfills," prepared by GeoChem Applications in conjunction with Waste Management, Inc.; and (3) the Final Results from Bradley Landfill Leachate Sampling on April 7 & 8, 2003, by Severn Trent Laboratories Report (April 11, 2003). WM provided the final results, along with a letter of explanation, to the City's Industrial Waste Management Division, on May 6, 2003.<sup>13</sup>

In essence, the SWRCB Preliminary Landfill Results reflect general results of landfill sampling for gross alpha, gross beta, tritium, radium 226, radium 228 and uranium at thirty-five municipal landfills throughout the state. The Preliminary Landfill Results reported elevated levels of gross beta particle activity and tritium in the leachate at Bradley. Despite the undrinkable character of leachate, the SWRCB Preliminary Landfill Results compared the samples to existing Maximum Contaminant Levels ("MCLs") established for drinking water. The use of the MCLs by the SWRCB when evaluating leachate was for comparative purposes only and was not intended to be a meaningful regulatory standard for leachate.

In response to requests from the Los Angeles Regional Water Quality Control Board ("LARWQCB"), and the California Department of Health Services, WM commissioned additional studies to clarify the source of the beta-particle activity in the leachate sampled from BLRC. As shown in the Final Results (Attachment B), the reported gross beta-particle activity in the samples is caused by the presence of natural potassium-40, commonly found in many types of foods, fertilizer, green wastes and construction materials. (Attachment B, at p. 2.) As explained in the attachment, and

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<sup>12/</sup> (...continued)

Pendleton Avenue), Sun Valley Paper (located at San Fernando and Tuxford), and the recently approved Little League Stadium (located on Roscoe Avenue).

<sup>13/</sup> A true and correct copy of that transmission, including the Final Results, is attached hereto as Attachment B.

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pursuant to applicable regulations, the amount of potassium-40 detected in the leachate must first be subtracted as a natural source of radiation before comparing the leachate results to MCLs. (See, e.g., Attachment B, at p. 2.)

Attachment B also reflects that the elevated levels of tritium are likely related to household and/or commercial disposal of tritium-containing wastes. As illustrated in the attached study, tritium levels are at or substantially below the MCL's established for drinking water. (Attachment B, at p. 2.) The elevated gross beta and tritium levels at Bradley should therefore be included in the environmental setting as part of the existing baseline environment. (See, e.g., *Fat v. County of Sacramento, supra*, 97 Cal.App.4th at p. 1274.)

6. Conclusion.

Thank you for your consideration of the above comments. Please call if you have any questions or require additional technical information during preparation of the DEIR.

Very truly yours,



Andrea K. Leisy

Encl.

30517124.001

**ATTACHMENT A**



**Economics Research Associates**

**ECONOMIC AND FISCAL IMPACT  
ANALYSIS  
WASTE MANAGEMENT  
BRADLEY LANDFILL  
AND RECYCLING CENTER**

**PREPARED FOR  
WASTE MANAGEMENT**

**PREPARED BY  
ECONOMICS RESEARCH ASSOCIATES**

**APRIL 2002**

**ERA PROJECT NO. 14450**

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## Section I

### EXECUTIVE SUMMARY

Waste Management (WM) has retained Economics Research Associates (ERA) to evaluate the economic impact of annual operations of WM's business activities at the Bradley Landfill and Recycling Center located at 9081 Tujunga Avenue, Sun Valley. WM is in the process of submitting a Transition Master Plan to the City of Los Angeles for the Bradley Landfill and Recycling Center. The Transition Master Plan is a two phased effort that will propose both an interim, short-term extension of the landfill's operations to meet market demand through closure in 2007 (Phase I), and development of a transfer facility that will begin operations as the landfill closes (Phase II). The purpose of the Transition Master Plan is to provide for an orderly transition of the existing landfill site from an active landfill to a transfer station operation that will receive and then transport solid waste for disposal at other facilities throughout the region.

This study focuses solely on Phase I and the economic, fiscal and employment impacts created in the City of Los Angeles, the San Fernando Valley, Los Angeles County and the region, by continuing Bradley Landfill's operations at or below currently permitted levels through April 14, 2007 at the latest. The expected benefits of Phase II of the Transition Master Plan, while significant in terms of economic, fiscal and employment benefits to the City, the San Fernando Valley, the County and the region, are beyond the scope of this study.

The Bradley Landfill and Recycling Center facility is located in a highly industrialized corridor in the northeast San Fernando Valley, within the City of Los Angeles. The analysis in this report considers data from fiscal year 2001 and is based on certified financial data and tax records provided by WM to ERA for the purpose of this analysis.

The following categories of economic impacts were established for WM's activities in this report:

- Off-site expenditures
- Payroll
- Direct and indirect economic impacts
- Direct fiscal contributions to the General Fund of the City of Los Angeles

## **BACKGROUND**

WM is Los Angeles County's largest environmental services firm with over 1,000 employees in LA County. Because WM has such a significant presence in the Los Angeles economy, the firm has requested that ERA investigate the role and contributions of the firm's activities in light of the economic downturn which began in early 2001 and was exacerbated by the attacks of September 11. WM desired to establish in quantitative terms how their activities can continue to play an important role in assisting the local and regional economies given the following circumstances.

### **Economic Conditions**

- Los Angeles County's economy is expected to lose \$2 billion in revenue by June of 2002 with employment losses of over 41,000 as a direct result of the national economic downturn and the September 11 attacks.<sup>1</sup>
- These economic conditions have been especially hard in the northeast Valley where WM operates. While LA County's unemployment rate for December 2001 was 5.7 percent, Pacoima's unemployment rate was estimated to approach 20 percent.<sup>2</sup>
- These combined conditions created the region's first recession since the Gulf War.<sup>3</sup>

<sup>1</sup> Terror Disaster for Tourism Jobs, *Daily News*, October 18, 2001.

<sup>2</sup> Northeast Valley Getting Hit Hard as Jobless Rate Climbs, *San Fernando Valley Business Journal*, February 4, 2002.

<sup>3</sup> Experts Predict Recession for L.A., *Daily News*, October 31, 2001.

## Fiscal Issues

- As the City of Los Angeles began its budget planning process, the City was facing a \$250 million shortfall in budget revenues. These estimates represent a budget gap even larger than the one that confronted Los Angeles in the recession of the early 1990s.<sup>4</sup>
- City of Los Angeles Controller, Laura Chick, estimates that the City will receive about \$140 million less in revenue next year than in the current year, with lower revenue expected in key categories such as sales taxes, licenses, permits, and fines.<sup>5</sup>
- According to Judith Wilson, the director of the City of Los Angeles' Bureau of Sanitation "The bottom has fallen out of the budget after the events of September 11th, and if anything, the situation has become worse. The general fund - which is where a large part of public works allocations come from - is out of money...We are scrambling just to get the operating dollars we need to complete our basic city services."<sup>6</sup>
- The City of Los Angeles has developed several extraordinary budgetary programs, in particular, increased financial contributions from the Department of Water and Power, and hopes for higher tax proceeds, to stabilize the budget situation. The City's need for increased revenue from other sources, however, remains very high.

Given these factors, WM wanted to both analyze and describe how its annual operations contribute to supporting and stabilizing economic conditions in the City of Los Angeles, the San Fernando Valley, Los Angeles County, and the region, and to elaborate on what their activities produce in terms of General Fund revenues for the City of Los Angeles.

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<sup>4</sup> City's Budget Gap to Affect Services, *Los Angeles Times*, January 31, 2002.

<sup>5</sup> Controller Chick Dimes City Hall's Fiscal Forecast, *Daily News*, March 6, 2002.

<sup>6</sup> Metro Investment Report, March 2002, page 1.

## **BRADLEY LANDFILL AND RECYCLING CENTER**

The Bradley Landfill and Recycling Center began operations in 1959. It was acquired by WM in 1986, and has been operated continuously by WM since then. The facility includes a landfill, recycling center, and a green waste recycling program, in addition to a gas recovery facility, and its co-located hauling company. The facilities at Bradley serve L.A. County and L.A. City residences, numerous municipalities, businesses, and municipal and private haulers.

The Bradley Landfill handled the City of L.A. disposal contract from July 1996 until June 2001, inclusive of the period following the Northridge earthquake when the quantity of waste significantly increased. Presently, the Bradley Landfill and Recycling Center operates the City of L.A.'s green waste program, and provides backup for the City of L.A.'s residential waste collection program when other landfills close early due to capacity or weather conditions. The Bradley Landfill and Recycling Center is a *critical* element in the region's recycling and disposal network, and is relied upon by thousands of residences and businesses for safe, cost-effective disposal services.

The facility is located in a stable site in a highly industrialized portion of the northeast San Fernando Valley near the Burbank Airport, the CalMat quarry, a major L.A. DWP facility, and several closed landfills. The project site is an irregularly shaped rectangle bounded by the Los Angeles Department of Water and Power transmission right-of-way, Glenoaks Boulevard, Tujunga Avenue, Peoria Street, Bradley Avenue, and the former Southern Pacific/current Metrolink rail line. The project also conforms with local community plans for commercial and industrial uses.

## **PROPOSED TRANSITION MASTER PLAN**

At present, WM is seeking a plan approval that is part of a near-term strategy to close Bradley Landfill and a long-term strategy to transition its operations from a disposal facility to a recycling and transfer facility. WM has submitted applications to the City of Los Angeles for a two-phased Transition Master Plan for its facilities, with the intent of assisting the marketplace to transition smoothly from disposal at Bradley Landfill to other disposal options that would be routed via a transfer station to be developed at the Bradley site. The

two phases are: (I) an interim, proposed increase in the presently permitted height of the landfill to permit continued operations at or below the levels allowed under current permits to meet current market demand; and (II) implementation of a transfer station operation within the current landfill site.

The purpose of the Transition Master Plan is to provide for an orderly transition of the existing landfill site from an active landfill to a transfer station operation that will receive and then transport solid waste for disposal at other facilities throughout the region.

The facility has secured a Zone Variance which will expire April 14, 2007, at which point the Landfill is expected to cease operations. One aspect of WM's plan approval would result in an increase in the height of the landfill of 43 feet over the next 2-4 years as the landfill approaches closure. This would not change the "footprint" of the landfill, and would create an additional 4.7 million cubic yards of capacity to serve local businesses, residents, and municipalities, based on expected market demand during the transition period.

*The plans under consideration would not increase the amount of tonnage accepted daily, the hours of operations, or the number of daily truck trips to the landfill. Nor does the Transition Master Plan include a request to extend the Zone Variance beyond April 14, 2007.*

### CURRENT OPERATIONS

Presently, WM operates two distinct businesses at their Sun Valley/City of Los Angeles location. The main facility is the Bradley Landfill and Recycling Center, a disposal and recycling facility for solid waste collected in communities throughout the Los Angeles area, and principally from within the City of Los Angeles and the San Fernando Valley. The second business enterprise operated at the site by WM is the Sun Valley Hauling Company, which transports solid waste material from municipalities and commercial users, principally from within the City of Los Angeles and the San Fernando Valley, to the landfill and other facilities in Los Angeles.

WM's operations in Los Angeles are significant business enterprises. In 2001, both the Bradley Landfill and Recycling Center and Sun Valley Hauling each expended more than



\$29.2 million each for a combined total of over \$58.48 million in total operating costs by WM to operate these enterprises.

The expenditures are over and above what was spent on site for fuel, building repair, and maintenance. All of these figures will be analyzed in closer detail in this report.

Key findings by area of economic impact are summarized in the following section.

## HIGHLIGHTS OF THE ECONOMIC AND FISCAL IMPACT STUDY

### Expenditures

- WM spent over \$6.9 million in the City of Los Angeles for goods and services, with \$22.4 million spent overall in Los Angeles County.
- WM spent over \$3.9 million for goods and services from vendors in the San Fernando Valley communities of the City of Los Angeles - WM operations are a significant source of economic activity in the San Fernando Valley.

### Payroll/Jobs

- Combined WM operations support more than 200 jobs, and over \$6.5 million in payroll, for mostly union and minority employees.
- Of this total payroll expenditure, over two thirds, or \$4.3 million, were paid to workers who are residents of the City of Los Angeles, again, the majority of whom are union and minority employees.
- The majority of WM's payroll expenditures were distributed to workers who reside in the San Fernando Valley of the City of Los Angeles. Leading communities included Sylmar, at just under \$1 million in wages; and Pacoima and Sun Valley, each with over \$800,000 paid to community residents.
- Overall in Los Angeles County, 511 jobs and over \$17.4 million in earnings, are supported by the economic activity generated by WM's combined operations in Sun Valley.

### Economic Impacts

- The total direct economic activity of WM operations in 2001 in Los Angeles County was slightly more than \$43.1 million.

- This activity induced an additional \$30.4 million in secondary and indirect economic activity for total contributions of \$73.5 million to the economy of Los Angeles County.

### Fiscal Impacts

- Combined WM operations in Sun Valley are significant contributors to General Fund revenues in the City of Los Angeles. General Fund revenues to the City of Los Angeles were generated in the following areas:
  - Property tax: \$189,000
  - Utility user taxes and franchise fees: \$145,000
  - Miscellaneous fees, licenses, and permits: \$398,000
- Combined WM operations contributed over \$730,000 in General Fund revenues to the City of Los Angeles in 2001
- If the landfill operations continue at or below currently permitted levels until 2007 per its plan approval, the landfill can be expected to generate more than \$3.66 million in General Fund revenues to the City of Los Angeles over the life of the project.
- If Phase II of the Transition Master Plan is implemented, further economic, fiscal and employment and job benefits certainly will inure to the City of Los Angeles, the San Fernando Valley, Los Angeles County and the region.

### GENERAL LIMITING CONDITIONS

Every reasonable effort has been made to ensure that the data contained in this analysis reflects the most accurate and timely information possible, and is believed to be reliable. This study is based on estimates, assumptions, and other information developed by Economics Research Associates from its independent effort, general knowledge of fiscal and economic development impact analysis practices, and consultation with the client and the

client's representatives. No responsibility is assumed for inaccuracies and reporting by the client, the client's agents and representatives, or any other data source used in preparing or presenting this study. This report is based on information that was current as of February 2002, and Economics Research Associates has not undertaken any update of this research effort since this date. This report is qualified entirely by these terms.

## Section II

### TECHNICAL ANALYSIS

Waste Management (WM) has retained Economics Research Associates (ERA) to evaluate the economic impact of annual operations of WM's business activities at the Bradley Landfill and Recycling Center located at 9081 Tujunga Avenue, Sun Valley. The facility is located in a highly industrialized corridor in the Northeast San Fernando Valley, within the City of Los Angeles.

This report represents a summary and analysis of the economic impact on the regional economy (city of Los Angeles, the San Fernando Valley, Los Angeles County) generated by WM's operations, and the effects in terms of output, payroll, and employment generated by the activities there. This analysis considers data from fiscal year 2001, and is based on proprietary operational and financial data provided by WM to ERA for the purpose of this analysis. In addition to the analysis of the economic impacts of operations, ERA has also investigated the fiscal contributions of WM's operations in Sun Valley to the general fund revenues of the City of Los Angeles. WM's operations generate significant contributions to the City of Los Angeles's general fund, primarily from the following areas:

- Property taxes
- Utility user taxes
- Sales and use taxes
- Permits, fees, and business licenses

#### INTRODUCTION

Presently, WM operates two distinct businesses in Sun Valley. The main facility is the Bradley Landfill and Recycling Center, a disposal and recycling facility for solid waste collected in communities throughout the greater Los Angeles region, and principally from within the City of Los Angeles and the San Fernando Valley portion of the City. The second business enterprise operated at the site by WM, is the Sun Valley Hauling Company, which

transports solid waste and recyclable material from municipalities and commercial users, to the landfill and other facilities in Los Angeles.

WM's operations in Sun Valley are significant business enterprises. For fiscal year 2001, both the Bradley Landfill and Recycling Center and Sun Valley Hauling each expended more than \$29.2 million each for their annual operations. This represents a combined total of \$58.48 million in total operating costs by WM at the facility

This is over and above on-site expenditures for fuel, building repair, and maintenance all of which were spent on site. All of these figures will be analyzed in closer detail in this report. These expenditures form the basis of the primary direct economic impact of operations at the Bradley Landfill and Recycling Center and for Sun Valley Hauling.

Determination of the total economic impact involves calculating the value of the economic multiplier which quantifies indirect and induced impacts resulting from the primary or direct expenditures in the local economy. Combining the primary and indirect expenditure yields an estimate of the overall impact. Impacts discussed in this report are presented as annual impacts. That is to say, the level of economic activity indicated in the analysis is representative of one year of operation. A number of important assumptions have been made in this analysis, and form the basis of the model of economic activity presented. These assumptions include the following:

- All dollar amounts are shown in 2001 dollars, and are based on actual expenditures provided by WM
- The economic impact analysis has been undertaken at the County level using region-specific multipliers for the calculation of indirect and induced impacts, which reflect the structures of the local economy examined.

ERA has used the U.S. Department of Commerce Bureau of Economic Analysis RIMSII model as the basis of multipliers, and has used sector specific factors for estimating the indirect and induced effects of expenditures on the local economy. Expenditures and operational costs for goods and services consumed by Sun Valley Hauling and the Bradley Landfill and Recycling Center in Los Angeles County totaled over \$43.1 million in 2001 (the

difference between the \$58.48 million of total operating costs and the \$43.1 million is money spent outside of Los Angeles County and money spent on intangibles such as insurance and taxes). The effect of this spending will be detailed in the following areas:

- Geographic distribution of expenditures
- Geographic distribution of payroll
- Economic impact of operations in L.A. County
- Fiscal impacts on the general fund revenues of the City of Los Angeles

## EXPENDITURES

### HIGHLIGHTS:

- Over \$6.9 million were spent in the City of Los Angeles for goods and services
- \$22.4 million were spent for goods and services in Los Angeles County
- Over \$3.9 million in goods and services were purchased from vendors in the San Fernando Valley communities of the City of Los Angeles.

This section considers the geographic distribution of WM's off-site expenditures for operations of the Bradley Landfill and Recycling Center and the Sun Valley Hauling Company in L.A. County. In 2001, WM's operations totaled just over \$43 million for both on- and off-site expenditures for the combined operations of both entities. Of these total operations costs, the off-site landfill operations totaled over \$12.7 million, and the Hauling Company had off-site operations expenditures of \$9.6 million, for a combined total of \$22.4 million in off-site operating expenditures.

### Off-Site Expenditures—L.A. County

The Bradley Landfill and Recycling Center spent just over \$3 million in 2001 for goods and services procured directly in the City of Los Angeles. This accounted for just under one-quarter of total off-site expenditures by the landfill operation. The Sun Valley Hauling Company spent over \$3.8 million in the City of Los Angeles for goods and services in 2001 accounting for just over one-third of their total local expenditures.

Table II-1 shows that total off-site expenditures required for operation of both the Landfill and the Hauling operations totaled just over \$6.9 million in 2001.

### Off-Site Expenditures—Los Angeles Communities

A further analysis of the City of Los Angeles expenditures shows that the Bradley Landfill and Recycling Center and Sun Valley Hauling Company operations have significant expenditures in San Fernando Valley communities in the City of Los Angeles, and, as such, represent a significant source of economic activity in the San Fernando Valley.

The majority of expenditures in Los Angeles County by WM were for goods and services purchased in San Fernando Valley communities of the City of Los Angeles. This accounted for over \$3.9 million in direct off-site expenditures in the San Fernando Valley.

Table II-2 shows the distribution by City of LA communities for combined WM operations.

Figure II-1 displays the distribution of off-site expenditures by WM in LA County by zip code. Note the strong concentration of expenditures for goods and services by WM in the northeast corner of the San Fernando Valley in the City of Los Angeles. These figures represent the off-site expenditures independent of the costs for repair and maintenance of buildings and equipment on site, and labor and payroll expenses which are detailed below.

### PAYROLL/JOBS

#### HIGHLIGHTS:

- Over \$6.5 million in payroll to more than 200 area workers.
- Of this total payroll expenditure, over two thirds, or \$4.3 million, were paid to workers who are residents of the City of Los Angeles.
- The majority of WM's payroll expenditures were distributed to workers who reside in the San Fernando Valley of the City of Los Angeles. Leading

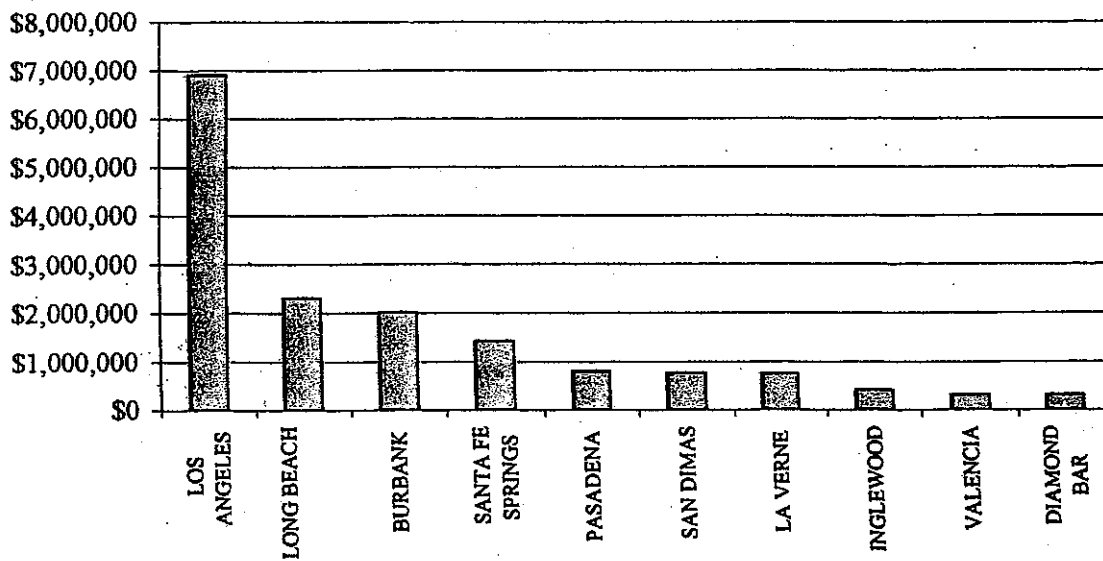


**Table II-1**

**Bradley Landfill and Recycling Center  
and Sun Valley Hauling Combined Expenditures in LA County**

<b>RANK</b>	<b>CITY</b>	<b>EXPENDITURES</b>
1	LOS ANGELES	\$6,909,612
2	LONG BEACH	\$2,311,036
3	BURBANK	\$2,024,110
4	SANTA FE SPRINGS	\$1,426,600
5	PASADENA	\$805,894
6	SAN DIMAS	\$768,557
7	LA VERNE	\$760,332
8	INGLEWOOD	\$417,349
9	VALENCIA	\$313,270
10	DIAMOND BAR	\$308,424
	<b>Total</b>	<b>\$16,045,184</b>
	Rest of LA County	\$6,384,855
	<b>Grand Total</b>	<b>\$22,430,039</b>

**Combined Expenditures in LA County**



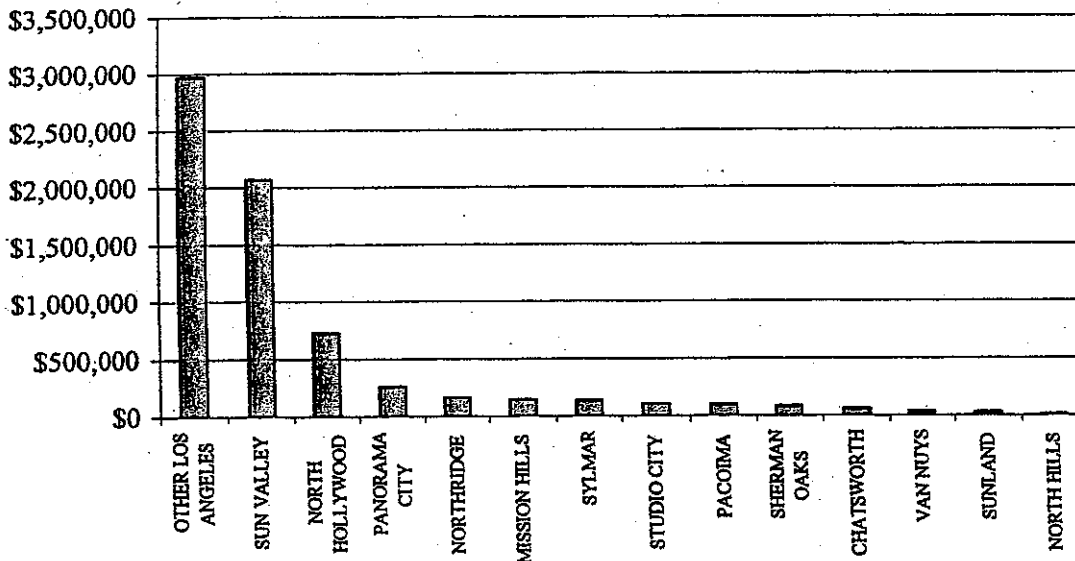
Source: Waste Management, and Economics Research Associates

**Table II-2**

**Bradley Landfill and Recycling Center  
and Sun Valley Hauling Combined Expenditures in LA Communities**

<b>RANK</b>	<b>CITY</b>	<b>EXPENDITURES</b>
1	OTHER LOS ANGELES	\$2,972,020
2	SUN VALLEY	\$2,070,943
3	NORTH HOLLYWOOD	\$724,198
4	PANORAMA CITY	\$256,728
5	NORTHRIDGE	\$163,247
6	MISSION HILLS	\$146,132
7	SYLMAR	\$136,815
8	STUDIO CITY	\$109,910
9	PACOIMA	\$99,293
10	SHERMAN OAKS	\$85,170
11	CHATSWORTH	\$64,133
12	VAN NUYS	\$41,139
13	SUNLAND	\$28,300
14	NORTH HILLS	\$11,583
	<b>Total</b>	<b>\$6,909,612</b>

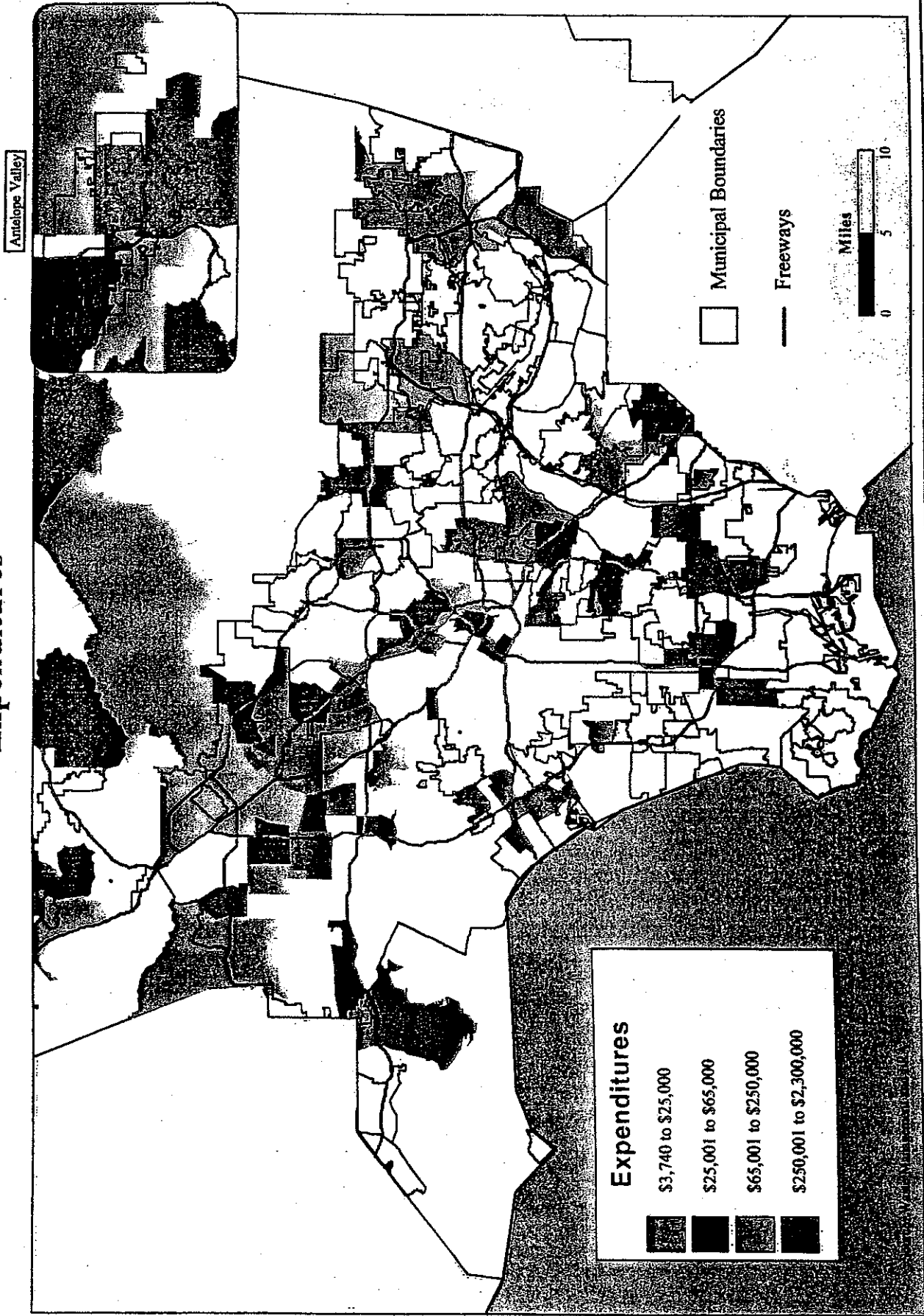
**Combined Expenditures in LA Communities**



Source: Waste Management, and Economics Research Associates

Figure II-1

# Combined Waste Management Expenditures



- communities included Sylmar at just under \$1 million in wages; and Pacoima and Sun Valley each with over \$800,000 paid to community residents.
- Economic activity in Los Angeles County, described later in this report, generated over \$17.4 million in earnings to Los Angeles County workers. When combined with employment at WM's combined operations in Sun Valley, 511 jobs are supported.

This section considers the distribution of payroll to employees at WM's operations in Sun Valley. Included in this analysis are only direct payments to workers exclusive of fringe benefits and the burden rate associated with employment. These costs are, however, included in economic impact analysis which follows.

#### **Payroll—L.A. County**

Of the total \$1.3 million in payments to area workers employed at Bradley Landfill, the overwhelming majority, or \$856,000, was paid to workers who reside in the City of Los Angeles. A similar distribution exists for Sun Valley Hauling with over \$3.4 million in payments to workers in the City of Los Angeles alone. Combined WM payroll expenditures in L.A. County are displayed on Table II-3 and mapped on Figure II-2. With over \$4.3 million in direct payments to workers who reside in the City of Los Angeles which accounts for over 66 percent of total payments to workers by WM.

#### **Payroll—Los Angeles Communities**

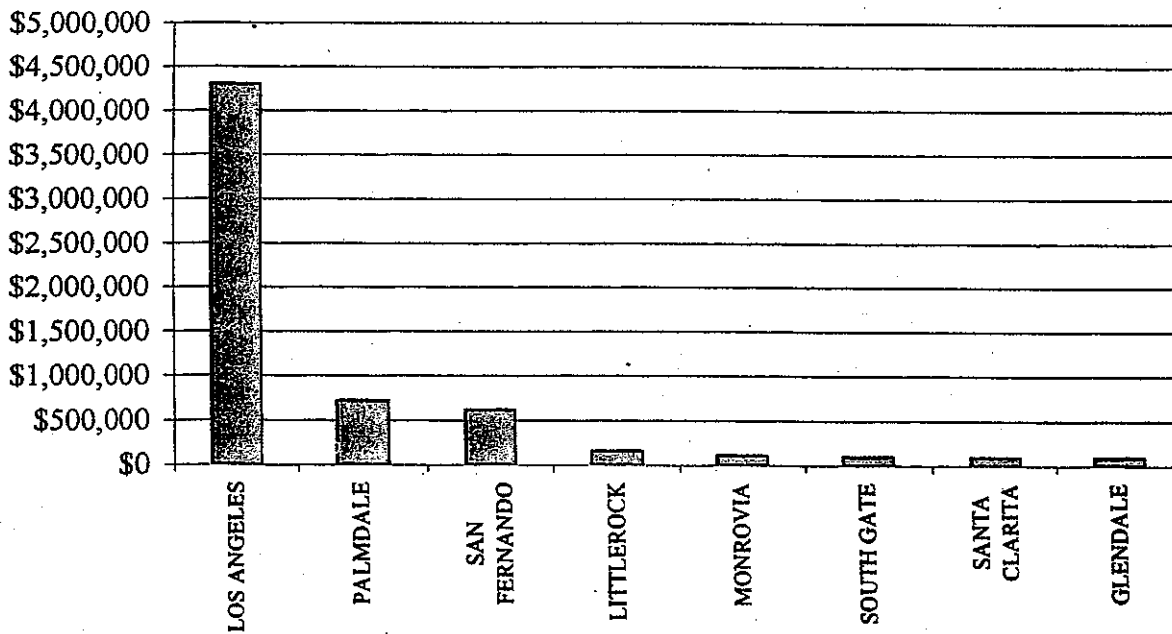
The Bradley Landfill and Recycling Center paid over \$856,000 of payroll to city of Los Angeles resident workers, 100 percent of this payroll was distributed to San Fernando Valley residents. The same is true of the \$3.4 million in payroll for the Sun Valley Hauling Company. Table II-4 shows the distribution of the \$4.3 million in payments to area workers within the City of Los Angeles all of which occurred in the Valley. Note the strong concentration of earnings by area workers in the northeast San Fernando Valley portion of the City of Los Angeles. Figure II-2 shows the distribution of the combined payroll.

Table II-3

**Bradley Landfill and Recycling Center  
and Sun Valley Combined Payroll in LA County**

RANK	CITY	PAYROLL
1	LOS ANGELES	\$4,309,567
2	PALMDALE	\$726,204
3	SAN FERNANDO	\$619,740
4	LITTLEROCK	\$161,008
5	MONROVIA	\$111,210
6	SOUTH GATE	\$100,015
7	SANTA CLARITA	\$96,927
8	GLENDALE	\$95,797
	<b>Total</b>	<b>\$6,220,468</b>
	Rest of LA County	\$288,639
	<b>Grand Total</b>	<b>\$6,509,107</b>

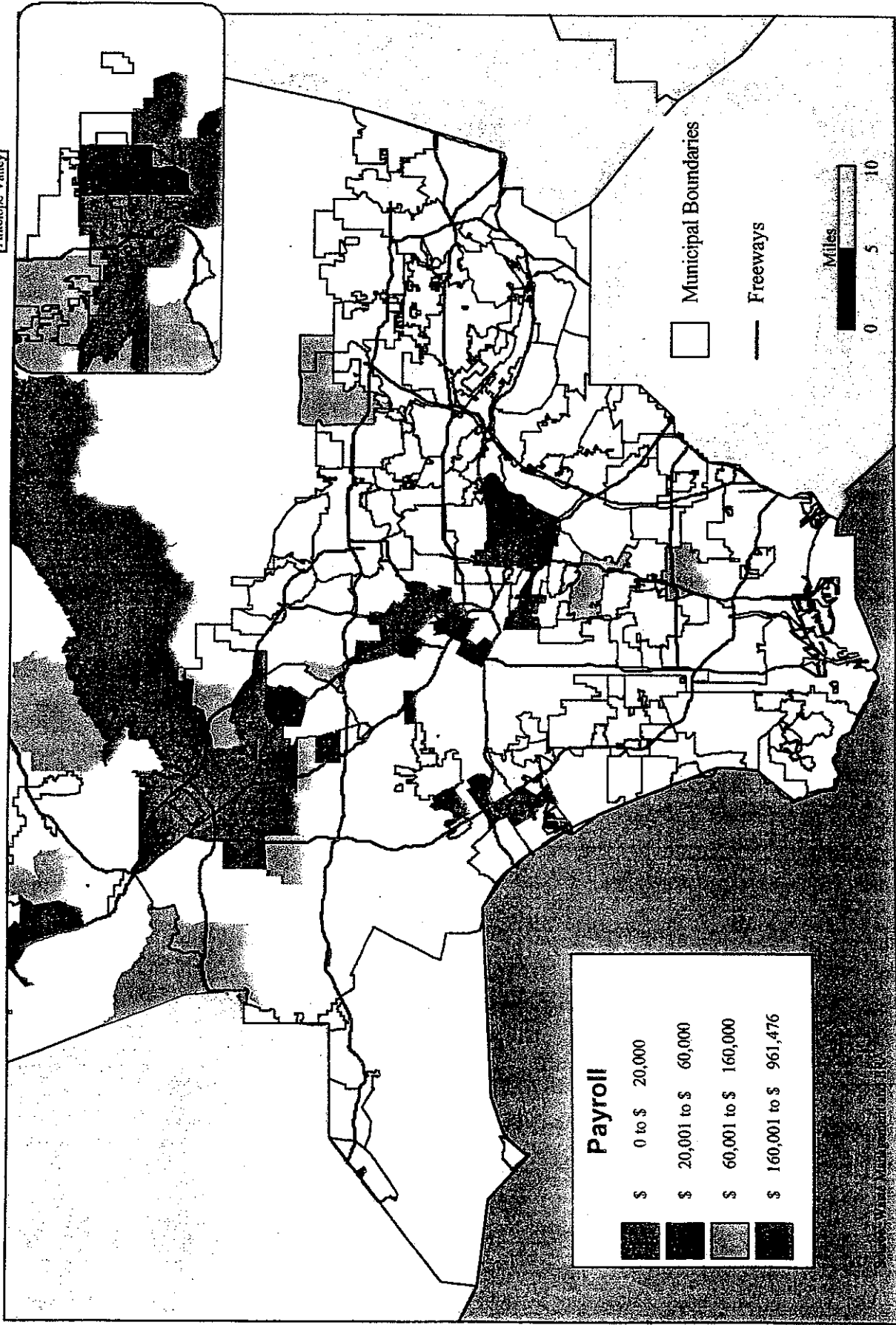
**Combined Payroll in LA County**



Source: Waste Management, and Economics Research Associates

Figure II-2

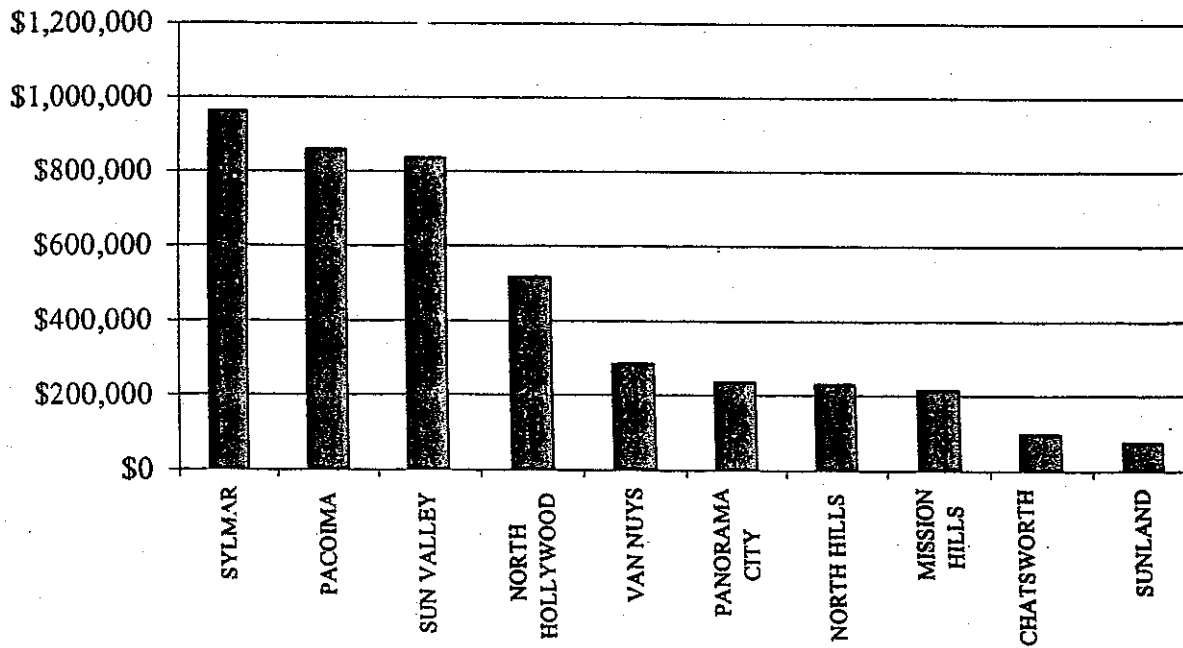
# Combined Waste Management Payroll



**Table II-4  
Bradley Landfill and Recycling Center  
and Sun Valley Hauling Combined Payroll in LA Communities**

<b>RANK</b>	<b>CITY</b>	<b>PAYROLL</b>
1	SYLMAR	\$961,476
2	PACOIMA	\$858,414
3	SUN VALLEY	\$835,907
4	NORTH HOLLYWOOD	\$514,947
5	VAN NUYS	\$284,361
6	PANORAMA CITY	\$235,002
7	NORTH HILLS	\$230,027
8	MISSION HILLS	\$215,211
9	CHATSWORTH	\$98,160
10	SUNLAND	\$76,062
	<b>Total</b>	<b>\$4,309,567</b>

**Combined Payroll in LA Communities**



Source: Waste Management, and Economics Research Associates

## ECONOMIC IMPACTS

### HIGHLIGHTS:

- The total direct economic activity of WM operations in 2001 was in Los Angeles County was slightly more than \$43.1 million.
- This activity induced an additional \$30.4 million in secondary and indirect economic activity for total contributions of \$73.5 million to the economy of Los Angeles County.

Table II-5 projects the total direct and induced economic impact for the year 2001 operations of Sun Valley Hauling and Bradley Landfill and Recycling Center. The figures presented represent an annual on-going level of contribution to the economy of Los Angeles County. These include both the off-site operations costs detailed previously in this section, in addition to the impacts from on-site expenses such as labor costs, fuel and transportation, and maintenance of buildings and equipment.

There are two components of economic impact that are measured in the analysis. The first type of impact is the direct or primary impact, and the second is the indirect or induced impact. The direct or primary impact refers to the initial first-round expenditures associated with WM operations. These include the operating expenses of both the Hauling Company and the Bradley Landfill and Recycling Center, both on site and in the broader economy.

Indirect and induced impact, also known as the multiplier, refers to the subsequent rounds of respending of the primary or first-round expenditures. The multiplier effect is literally a summation of respending which results in the local economy as the first round or primary expenditures are recycled through the region. The induced impact is calculated on the basis of a net multiplier to determine the total indirect and induced impacts. Four separate multipliers have been used as they are sector-specific figures for the economic activities associated with the operation of both the Hauling Company and the Bradley Landfill and Recycling Center. These multipliers represent the ability of the economy of Los Angeles County to provide goods and services required by output for unit of final demand.



**Table III-5**  
Detailed Summary of Economic Impacts

	MULTIPLIERS				ECONOMIC IMPACTS						
	Total Output	Total Earnings	Total Employment	Total	Direct		Induced		Total Output	Total Earnings	Total Employment
					Output		Output				
<b>Bradley Landfill and Recycling Center</b>											
Labor Expenses	1.2470	0.3181	11.6		\$4,873,324	\$1,203,711	\$6,077,035	\$1,550,204		57	
Fuel & Transportation Costs	2.0880	0.5143	18.3		\$609,005	\$662,597	\$1,271,602	\$313,211		11	
Building & Equipment Costs	1.9717	0.5502	17.6		\$2,841,129	\$2,760,725	\$5,601,854	\$1,563,189		50	
<u>Operational Costs</u>	1.9215	0.4253	10.4		\$12,750,069	\$11,749,188	\$24,499,257	\$5,422,604		133	
<b>Total</b>					\$21,073,527	\$16,376,222	\$37,449,749	\$8,849,209		250	
<b>Sun Valley Hauling</b>											
Labor Expenses	1.2470	0.3181	11.6		\$9,702,589	\$2,396,539	\$12,099,128	\$3,086,394		113	
Fuel & Transportation Costs	2.0880	0.5143	18.3		\$1,199,459	\$1,305,011	\$2,504,470	\$616,882		22	
Building & Equipment Costs	1.9717	0.5502	17.6		\$1,489,147	\$1,447,004	\$2,936,151	\$819,329		26	
<u>Operational Costs</u>	1.9215	0.4253	10.4		\$9,679,971	\$8,920,093	\$18,600,064	\$4,116,892		101	
<b>Total</b>					\$22,071,166	\$14,068,648	\$36,139,814	\$8,639,496		261	

These multipliers are based on the U.S. Department of Commerce Bureau of Economic Analysis RIMS II Regional Economic Multiplier System.

It should be recognized that the use of the multiplier concept is well accepted in measuring the respending impact of initial expenditures in the economy. While the actual multiplier values for given areas can be made more precise given the extremely complex maze of economic interrelationships that are difficult to fully document, this analysis has used sector-specific values tied to the Los Angeles economy. Nevertheless, the magnitude of the multiplier values is regarded as acceptable and appropriate for approximating the induced and indirect impacts.

Using this method, the initial spending for WM operations would induce additional spending in the following manner:

- Bradley Landfill and Recycling Center operations have a direct economic impact of just over \$21 million on the economy of Los Angeles County
  - This direct spending induces an additional \$16.3 million for a total economic impact of just over \$37.4 million
  - The effect of the direct and induced economic impact contributes over \$8.8 million in earnings to area workers supporting 250 jobs.
- Sun Valley Hauling has a direct economic impact of just over \$22 million on the economy of Los Angeles County
  - This spending induces an additional \$14 million for a total of \$36.1 million in total economic impact from annual operations of the Hauling Company
  - This economic activity supports 261 jobs with earnings of over \$8.6 million to Los Angeles County area workers
- The total direct economic activity of WM operations for 2001 is slightly more than \$43.1 million

- This activity induced an additional \$30.4 million in secondary and indirect economic activity for a total contribution of \$73.5 million to the economy of Los Angeles County
- This economic activity generated over \$17.4 million in earnings to L.A. County workers, and supported approximately 511 jobs

The summary of these economic impacts is detailed on Table II-6.

### **FISCAL IMPACTS**

- HIGHLIGHTS:**
- Combined WM operations in Sun Valley are significant contributors to General Fund revenues to the City of Los Angeles. General Fund revenues to the City of Los Angeles were generated in the following areas:
    - Property tax: \$189,000
    - Utility user taxes and franchise fees: \$145,000
    - Miscellaneous fees, licenses, and permits: \$398,000
  - Combined WM operations contribute over \$733,000 in General Fund revenues to the City of Los Angeles in 2001
  - If the facility is able to operate until 2007, it can be expected to generate more than an additional \$3.66 million in General Fund revenues to the City of Los Angeles over the life of the project

The considerable volume of economic activity that is generated by WM from both the Bradley Landfill and Recycling Center and the San Valley Hauling Company has resulted in significant contributions to the general fund revenues to the City of Los Angeles. Table II-7 breaks down the contributions in terms of general fund payments that took place as a result of 2001 operations. Tax contributions come primarily from the following sources:

**Table II-6  
Summary of Economic Impacts**

	<b>Bradley Landfill and Recycling Center</b>	<b>Sun Valley Hauling</b>	<b>Total</b>
<b>Economic Output</b>			
Direct	\$21,073,527	\$22,071,166	\$43,144,693
Induced	\$16,376,222	\$14,068,648	\$30,444,870
Total	\$37,449,749	\$36,139,814	\$73,589,563
<b>Total Earnings</b>	\$8,849,209	\$8,639,496	\$17,488,705
<b>Total Employment</b>	250	261	512

Table II-7  
**WASTE MANAGEMENT**  
**DIRECT FISCAL CONTRIBUTIONS**  
**CITY OF LOS ANGELES**  
 2001 Operations

		Bradley Landfill	Sun Valley	Total Operations
<b>PROPERTY TAX</b>				
Total Payments		\$1,717,832		\$1,717,832
City Share	11%	\$188,962	N.A.	\$188,962
<b>UTILITY USER TAX AND FRANCHISE FEE</b>				
Utilities, Electrical	12.5%	\$118,522	\$11,344	\$129,866
Utilities, Telephone	10%	\$5,103	\$11,375	\$16,478
<b>FEES AND PERMITS</b>				
Business License		\$297,207	\$94,772	\$391,979
Fees, Permits		\$2,773	\$3,769	\$6,542
<b>TOTAL TAX</b>		<b>\$612,568</b>	<b>\$121,260</b>	<b>\$733,827</b>

Source: Waste Management, and Economics Research Associates

Sales and use tax with tipping fees being a taxable transaction

- Property tax
- Utility user tax and franchise fees
- Miscellaneous fees, permits, and licenses

WM contributed just under three fourths of a million dollars (\$733,827) to the General Fund of the City of Los Angeles in 2001. Of this amount, just over \$612,000 in local taxes was paid by the Bradley Landfill and Recycling Center, and approximately \$121,000 was contributed by San Valley Hauling.

**ATTACHMENT B**

**BRADLEY LANDFILL AND RECYCLING CENTER**  
A WASTE MANAGEMENT COMPANY

9081 Tujunga Avenue  
Sun Valley, California 91352  
(818) 767-6180  
(818) 252-3239 Fax  
(818) 252-3107 24-Hour Community Hotline

May 6, 2003

Mr. Bellete Yohannes  
Chief Industrial Waste Inspector II  
Industrial Waste Management Division  
City of Los Angeles  
2714 Media Center Drive  
Los Angeles, CA 90065  
Fax: 323-342-6111

Subject: Beta-Particle Activity in Bradley Landfill and Recycling Center Leachate

Dear Mr. Yohannes:

This letter was prepared to inform you of recent information involving radioactivity issues and the leachate that is collected at the Bradley Landfill and Recycling Center (BLRC) in the Sun Valley District of the City of Los Angeles. Pursuant to Industrial Wastewater Permit Number W-430638, the BLRC discharges its leachate into the City of Los Angeles Sanitary Sewer System. Although there has been no substantial change in the volume or characteristic of the leachate being discharged, the BLRC offers the following brief synopsis in a good-faith effort to keep the Bureau fully informed of the recent sampling activity.

In a June 7, 2002 letter from the Los Angeles Region of the California Water Quality Control Board (RWQCB) to BLRC, the RWQCB requested that BLRC analyze groundwater and landfill leachate samples for specific radiochemical parameters. As noted in the RWQCB's letter, the purpose of collecting such data from the BLRC, as well as dozens of other landfills throughout California, is to "establish basic information on radioactivity characteristics of leachate and groundwater beneath active landfills in the state."

BLRC reported the results of its radiochemical testing to the RWQCB and the State Water Resources Control Board (SWRCB) on January 15, 2003 in a report entitled "*Results and Evaluation of Radiochemical Sampling at Six Waste Management, Inc. California Landfills*", prepared by GeoChem Applications in conjunction with Waste Management, Inc. The report findings were as follows:

- Groundwater and leachate samples collected for the study do not appear to exhibit radioactivity levels of radiological significance (i.e., radioactivity levels do not appear to be particularly unusual when compared to natural materials or materials typically found in municipal solid waste landfills, nor do they indicate the presence of unauthorized disposal of regulated radioactive materials).



Mr. Bellete Yohannes  
Beta-Particle Activity in Landfill Leachate  
May 6, 2003

Page 2

- Apparently elevated levels of gross-beta particle activity in leachate samples appear to be related to naturally occurring potassium-40. A correlation between gross beta-particle activity and dissolved potassium concentrations was observed.
- Apparently elevated levels of tritium in leachate samples is likely related to household and/or commercial disposal of tritium-containing wastes. The tritium levels are not particularly unusual with respect to leachate data reported in the literature and are below the Maximum Contaminate Levels (MCLs) established for drinking water.

Subsequent to the submittal of the above report, concern was expressed by the Radiological Health Branch of the California Department of Health Services (DHS) regarding the potential source of the reported gross beta-particle activity in BLRC leachate samples, which exhibited gross beta-particle activities up to of 940 pico-curies per liter (pCi/L). Although it was evident from our knowledge of BLRC leachate chemistry that natural potassium-40 (a relatively strong beta-particle emitter) was the likely cause of the beta-particle activity in leachate, BLRC performed further testing to clarify the source of the beta-particle activity and to address the concerns of DHS and other interested parties. This additional testing was performed the week of April 7, 2003. The results are shown on the attached table.

As shown, the results of the April 7, 2003, sampling demonstrates that, consistent with the conclusions of the January 2003 report, the reported gross beta-particle activity in BLRC leachate samples is caused by the presence of natural potassium-40. Potassium and the associated potassium-40 isotope are found in many materials that are commonly disposed in solid waste landfills including many types of foods, fertilizer, green wastes and construction materials. The presence of natural potassium-40 in leachate discharge is not considered a health concern and is not regulated by the DHS as a radioactive material or waste because it is naturally occurring. The drinking water standard that applies to gross beta-particle activity (50 pCi/l), moreover, does not include beta-particle contribution from potassium-40 because it is subtracted out under the applicable standards. As shown by the data on the attached table, the beta-particle activity of BLRC leachate samples does not exceed the gross beta-particle drinking water standard, after accounting for analytical error.

In summary, BLRC has strived to undertake a thorough and deliberate evaluation of the presence of beta-particle activity in leachate. BLRC has heeded the concerns of DHS and other parties and have addressed these concerns head-on with additional testing that conclusively demonstrates the natural potassium-40 as the source of the beta particle activity. We trust that you concur with these findings and, unless we hear otherwise, assume that BLRC may continue discharging its leachate into the Los Angeles sanitary sewer system without interruption or concern.

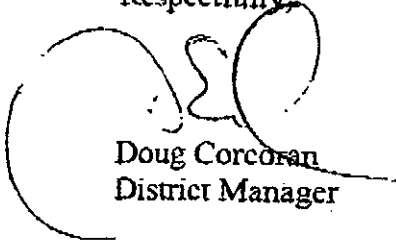
If you have any questions, comments or concerns please contact me. The BLRC will, of course, continue to keep the Bureau informed of any future information discovered with respect to the leachate generated on site and will continue to cooperate with the California Regional Water Quality Control Board, Los Angeles Region, and any other

Mr. Bellec Yohannes  
Beta-Particle Activity in Landfill Leachate  
May 6, 2003

Page 3

regulatory agencies, in their efforts to evaluate ground water and leachate that may be impacted by landfill operations. Thank you for your consideration of this matter.

Respectfully,

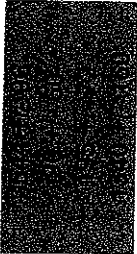
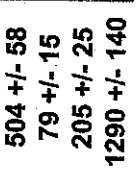

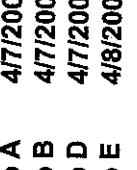


Doug Corcoran  
District Manager

Attachment: Table – Final Results from Bradley Landfill Leachate Sampling on April 7 & 8, 2003

- cc: Councilwoman Ruth Galanter, CD 6, 200 N. Spring St., Suite 475  
Los Angeles, CA 90012, Fax: 213-847-0549
- Ms. Tove Maiale, Chief Inspector, Valley Area, Ind. Waste Management Div.  
2714 Media Center Drive, Los Angeles, CA 90065, Fax: 818-756-9095
- Edgar Bailey, Chief, Radiological Health Branch, DHS  
601 N. 7<sup>th</sup> Street, Sacramento, CA 95814
- Rob Greger, Radiological Health Branch, DHS  
601 N. 7<sup>th</sup> Street, Sacramento, CA 95814
- Mark Leary, Executive Director, California Integrated Waste Management Board  
1001 I Street, 25<sup>th</sup> Floor, Sacramento, CA 95814
- Joe Mello, Chief, Landfill Section, State Water Resources Control Board  
1001 I Street, P.O. Box 944212, Sacramento, CA 94244-2120
- Rod Nelson, Chief, Landfill Section, Los Angeles Regional Water Quality  
Control Board, 320 W. Fourth Street, Ste. 200, Los Angeles, CA 90013
- Grace Chan, County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road, Whittier, CA 90601

FINAL RESULTS FROM BRADLEY LANDFILL LEACHATE SAMPLING ON APRIL 7 & 8, 2003  
 (from Severn Trent Laboratories Report, April 11, 2003)

	Gross Beta pCi/L EPA 900.0	Potassium-40 pCi/L EPA 901.1 Mod	Potassium-40 Calculated Beta Portion (K-40 * 0.89)	Total K mg/L	Tritium pCi/L 906.0 Mod
Sump A 4/7/2003	504 +/- 58		484	640	4040 +/- 450
Sump B 4/7/2003	79 +/- 15		80.1	80.7	20100 +/- 2000
Sump D 4/7/2003	205 +/- 25		174	268	6410 +/- 680
Sump E 4/8/2003	1290 +/- 140		1193	1,220	3810 +/- 440

**Conclusion:**

Measured Gross Beta particle activity and the portion of Gross Beta particle activity calculated from overall Potassium-40 activity are within the margin of analytical error and, therefore, can be viewed as equivalent.

**Description of Column Information:**

Gross Beta = Total Gross Beta Particle activity in leachate sample.

Potassium-40 Column = Total Potassium-40 activity in leachate sample - principally beta (~89%) and gamma (~11%).

Potassium-40 Calculated Beta Portion Column = Calculated Beta particle contribution from Potassium-40 (shown w/o margin of error)

Total K Column = Total concentration of Potassium in leachate sample in mg/l.

Tritium Column = Total Tritium activity in leachate sample

**ANALYTICAL REPORT**

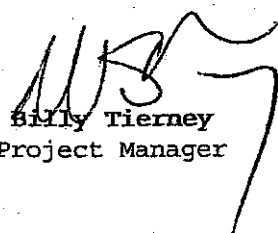
**Bradley Landfill**

**Lot #: F3D080115**

**Will Neal**

**GeoChem Applications  
3941 Park Drive  
Suite 20-249  
El Dorado Hills, CA 95762**

**SEVERN TRENT LABORATORIES, INC.**

  
**Billy Tierney  
Project Manager**

**April 11, 2003**

**Severn Trent Laboratories, Inc.  
STL St. Louis • 13715 Rider Trail North, Earth City, MO 63045  
Tel 314 298 8566 Fax 314 298 8757 • [www.stl-inc.com](http://www.stl-inc.com)**



**STL**

**ANALYTICAL REPORT**

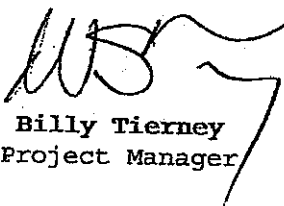
**Bradley Landfill**

**Lot #: F3D080115**

**Bruce Matlock**

**Waste Management Disp. Serv. o  
9081 Tujunga Ave  
Sun Valley, CA 91352**

**SEVERN TRENT LABORATORIES, INC.**



**Billy Tierney  
Project Manager**

**April 11, 2003**

**Severn Trent Laboratories, Inc.  
STL St. Louis • 13715 Rider Trail North, Earth City, MO 63045  
Tel 314 298 8566 Fax 314 298 8757 • [www.stl-inc.com](http://www.stl-inc.com)**

**Case Narrative**  
**LOT NUMBER: F3D080115**

This report contains the analytical results for the three samples received under chain of custody by STL St. Louis on April 8, 2003. These samples are associated with your Bradley Landfill project.

All applicable quality control procedures met method-specified acceptance criteria.

This report is incomplete without the case narrative. All chemical analysis results are based upon sample as received, wet weight, unless noted otherwise. All radiochemistry results are based upon sample as dried and ground with the exception of tritium, unless requested wet weight by the client.

Observations/Nonconformances

Reference the chain of custody and condition upon receipt report for any variations on receipt conditions and temperature of samples on receipt.

The samples were filtered and preserved at STL St. Louis before analysis.

Gross Beta by EPA900.0

The method calls for a 72 hour ingrowth. Due to the rush request for these results, the ingrowth period did not occur.

Affected Samples:

F3D080115 (1): Leachate Sump D

F3D080115 (2): Leachate Sump B

F3D080115 (3): Leachate Sump A

# METHODS SUMMARY

F3D080115

<u>PARAMETER</u>	<u>ANALYTICAL METHOD</u>	<u>PREPARATION METHOD</u>
Cs-137 & Hits By Gamma	GAMMA SPEC MULTI ISO CAL	EPA 901.1 MOD
Gross Alpha/Beta by GFPC	Th230/Sr90-Y90 cal	EPA 900.0 MOD
H-3 by Distillation & LSC	by LSC	EPA 906.0 MOD
Trace Inductively Coupled Plasma (ICP) Metals	MCAWW 200.7	MCAWW 200.7

## References:

EPA "EASTERN ENVIRONMENTAL RADIATION FACILITY RADIOCHEMISTRY PROCEDURES MANUAL" US EPA EPA 520/5-84-006 AUGUST 1984

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

# SAMPLE SUMMARY

F3D080115

<u>WO #</u>	<u>SAMPLE#</u>	<u>CLIENT SAMPLE ID</u>	<u>SAMPLED DATE</u>	<u>SAMP TIME</u>
FLG05	001	LEACHATE SUMP D	04/07/03	10:25
FLG08	002	LEACHATE SUMP B	04/07/03	11:08
FLG1A	003	LEACHATE SUMP A	04/07/03	11:25

**NOTE(S) :**

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.



WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP D

TOTAL Metals

Lot-Sample #....: F3D080115-001

Matrix.....: WATER

Date Sampled....: 04/07/03 10:25 Date Received...: 04/08/03

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u>		<u>METHOD</u>	<u>PREPARATION-</u>	<u>WORK</u>
		<u>LIMIT</u>	<u>UNITS</u>		<u>ANALYSIS DATE</u>	<u>ORDER #</u>
Prep Batch #....: 3098181						
Potassium	268000	5000	ug/L	MCAWW 200.7	04/08-04/10/03	FIG051AD
		Dilution Factor: 1		Analysis Time...: 10:47		

WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP B

TOTAL Metals

Lot-Sample #...: F3D080115-002

Matrix.....: WATER

Date Sampled...: 04/07/03 11:08 Date Received...: 04/08/03

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
Prep Batch #...: 3098181						
Potassium	80700	5000	ug/L	MCAWW 200.7	04/08-04/10/03	FLG081AD
		Dilution Factor: 1		Analysis Time...: 10:51		

WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP A

TOTAL Metals

Lot-Sample #...: F3D080115-003

Matrix.....: WATER

Date Sampled...: 04/07/03 11:25 Date Received...: 04/08/03

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u>		<u>METHOD</u>	<u>PREPARATION-</u>	<u>WORK</u>
		<u>LIMIT</u>	<u>UNITS</u>		<u>ANALYSIS DATE</u>	<u>ORDER #</u>
Prep Batch #...: 3098181						
Potassium	640000	50000	ug/L	MCAWW 200.7	04/08-04/10/03	FLG1A1AD
		Dilution Factor: 10		Analysis Time...: 11:19		

METHOD BLANK REPORT

TOTAL Metals

Client Lot #....: F3D080115

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
MB Lot-Sample #: F3D080000-181				Prep Batch #....: 3098181		
Potassium	ND	5000	ug/L	MCAWW 200.7	04/08-04/10/03	FLG1X1AA
		Dilution Factor: 1				
		Analysis Time...: 10:37				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #...: F3D080115

Matrix.....: WATER

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
------------------	-----------------------------	----------------------------	---------------	---------------------------------------	---------------------

LCS Lot-Sample#: F3D080000-181 Prep Batch #...: 3098181

Potassium 99 (85 - 115) MCAW 200.7 04/08-04/10/03 FLG1X1AC

Dilution Factor: 1 Analysis Time...: 10:42

**NOTE(S):**

---

Calculations are performed before rounding to avoid round-off errors in calculated results.

MATRIX SPIKE SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #....: F3D080115

Matrix.....: WATER

Date Sampled...: 04/07/03 11:08 Date Received...: 04/08/03

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
------------------	-------------------------	------------------------	------------	-------------------	---------------	-----------------------------------	---------------------

MS Lot-Sample #: F3D080115-002 Prep Batch #....: 3098181

Potassium	117	(70 - 130)			MCAWW 200.7	04/08-04/10/03	FLG081AF
	117	(70 - 130)	0.25	(0-20)	MCAWW 200.7	04/08-04/10/03	FLG081AG

Dilution Factor: 1

Analysis Time...: 10:56

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP D

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D080115-001  
 Work Order: FLG05  
 Matrix: WATER

Date Collected: 04/07/03 1025  
 Date Received: 04/08/03 0830

Parameter	Result	Qual	Total Uncert. (2 σ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld %
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>								
Gross Beta	205		25	14	04/09/03	04/10/03	3099161	
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>								
Tritium	6410		680	210	04/08/03	04/08/03	3098216	
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>								
Potassium 40	195		72	54	04/09/03	04/09/03	3099129	

NOTE(S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC

WASTE MANAGEMENT DISP. SERV. OF CA  
Client Sample ID: LEACHATE SUMP D DUP

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D080115-001X  
Work Order: FLG05  
Matrix: WATER

Date Collected: 04/07/03 1025  
Date Received: 04/08/03 0830

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld %
TRITIUM (Distill) by EPA 906.0 MOD						906.0 MOD		
Tritium	6240		660	210	04/08/03	04/09/03	3098216	
GROSS A/B BY GFPC EPA 900.0 MOD						900.0 MOD		
Gross Beta	200		25	14	04/09/03	04/10/03	3099161	

NOTE(S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC



WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP B

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D080115-002  
 Work Order: FLG08  
 Matrix: WATER

Date Collected: 04/07/03 1108  
 Date Received: 04/08/03 0830

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld %
GROSS A/B BY GFPC	EPA 900.0 MOD			pCi/L		900.0 MOD		
Gross Beta	79		15	16	04/09/03	04/10/03	3099161	
TRITIUM (Distill) by EPA	906.0 MOD			pCi/L		906.0 MOD		
Tritium	20100		2000	200	04/08/03	04/09/03	3098216	
Gamma Cs-137 & Hits by EPA	901.1 MOD			pCi/L		901.1 MOD		
Potassium 40	90		60	58	04/09/03	04/09/03	3099129	

NOTE (S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC

WASTE MANAGEMENT DISP. SERV. OF CA  
Client Sample ID: LEACHATE SUMP B DUP

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D080115-002X  
Work Order: FLG08  
Matrix: WATER

Date Collected: 04/07/03 1108  
Date Received: 04/08/03 0830

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld %
Gamma Cs-137 & Hits by EPA 901.1 MOD				pCi/L		901.1 MOD		
Potassium 40	20	U	44	80	04/09/03	04/09/03	3099129	

NOTE(S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC

U Result is less than the sample detection limit.

WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP A

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D080115-003  
 Work Order: FLG1A  
 Matrix: WATER

Date Collected: 04/07/03 1125  
 Date Received: 04/08/03 0830

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld %
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>								
Gross Beta	504		58	24	04/09/03	04/10/03	3099161	
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>								
Tritium	4040		450	200	04/08/03	04/09/03	3098216	
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>								
Potassium 40	544		96	48	04/09/03	04/09/03	3099129	

NOTE(S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC

METHOD BLANK REPORT

Severn Trent Laboratories - Radiochemistry

Client Lot ID: F3D080115  
 Matrix: WATER

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Lab Sample ID		
						Analysis Date	Batch #	Yld %
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>								
Tritium	-100	U	120	210	04/08/03	04/08/03	3098216	
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>								
Gross Beta	-0.2	U	1.1	1.9	04/09/03	04/10/03	3099161	
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>								
Potassium 40	42	U	44	49	04/09/03	04/09/03	3099129	

NOTE (S)

Data are incomplete without the case narrative.

MDC is determined using instrument performance only

Bold results are greater than the MDC

U Result is less than the sample detection limit.

# Laboratory Control Sample Report

## Severn Trent Laboratories - Radiochemistry

Client Lot ID: F3D080115  
 Matrix: WATER

Parameter	Spike Amount	Result	Total Uncert. (2σ+/-)	MDC	% Yld	% Rec	Lab Sample ID QC Control Limits
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>							
Tritium	8380	8510	pCi/L 890	906.0 MOD 210		101	F3D080000-216C (73 - 109)
	Batch #:	3098216				Analysis Date:	04/08/03
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>							
Americium 241	309000	290000	pCi/L 31000	901.1 MOD 200		94	F3D090000-129C (82 - 118)
Cesium 137	126000	119000	14000	90		95	(90 - 110)
Cobalt 60	223000	213000	22000	100		95	(90 - 110)
	Batch #:	3099129				Analysis Date:	04/09/03
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>							
Gross Beta	95.5	90.6	pCi/L 9.6	900.0 MOD 1.8		95	F3D090000-161C (79 - 116)
	Batch #:	3099161				Analysis Date:	04/10/03

**NOTE(S)**

MDC is determined by instrument performance only  
 Calculations are performed before rounding to avoid round-off error in calculated results

**DUPLICATE EVALUATION REPORT**

**Severn Trent Laboratories - Radiochemistry**

Client Lot ID: F3D080115  
 Matrix: WATER

Date Sampled: 04/07/03  
 Date Received: 04/08/03

Parameter	SAMPLE Result	Total Uncert. (2σ+/-)	% Yld	DUPLICATE Result	Total Uncert. (2σ+/-)	% Yld	QC Sample ID Precision
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>							
			pCi/L				F3D080115-001
Tritium	6410	680		6240	660		3 %RPD
	Batch #: 3098216 (Sample)			3098216 (Duplicate)			
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>							
			pCi/L				F3D080115-001
Gross Beta	205	25		200	25		2 %RPD
	Batch #: 3099161 (Sample)			3099161 (Duplicate)			
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>							
			pCi/L				F3D080115-002
Potassium 40	90	60		20 U	44		126 %RPD
	Batch #: 3099129 (Sample)			3099129 (Duplicate)			

**NOTE(S)**

Data are incomplete without the case narrative.  
 Calculations are performed before rounding to avoid round-off error in calculated results

U Result is less than the sample detection limit.

MATRIX SPIKE REPORT

Severn Trent Laboratories - Radiochemistry

Client Lot Id: F3D080115  
 Matrix: WATER

Date Sampled: 04/07/03  
 Date Received: 04/08/03

Parameter	Spike Amount	Spike Result	Total Uncert. (2σ +/-)	Spike Yld.	Sample Result	Total Uncert. (2σ +/-)	QC Sample ID		QC Control Limits
							%YLD	%REC	
TRITIUM (Distill) by EPA	906.0 MOD		pCi/L		906.0 MOD		F3D080115-001		
Tritium	8380	14300	1500		6410	680		94	(73 - 109)
	Batch #:	3098216		Analysis Date:	04/09/03				
GROSS A/B BY GFPC EPA	900.0 MOD		pCi/L		900.0 MOD		F3D080115-001		
Gross Beta	637	891	93		205	25		108	(79 - 116)
	Batch #:	3099161		Analysis Date:	04/10/03				

NOTE(S)

Data are incomplete without the case narrative.

Calculations are performed before rounding to avoid round-off errors in calculated results.

**ANALYTICAL REPORT**

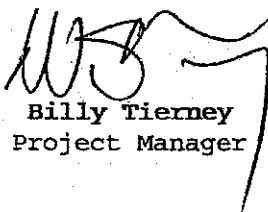
**Bradley Landfill**

**Lot #: F3D090123**

**Will Neal**

**GeoChem Applications  
3941 Park Drive  
Suite 20-249  
El Dorado Hills, CA 95762**

**SEVERN TRENT LABORATORIES, INC.**

  
**Billy Tierney  
Project Manager**

**April 11, 2003**

**Severn Trent Laboratories, Inc.  
STL St. Louis • 13715 Rider Trail North, Earth City, MO 63045  
Tel 314 298 8566 Fax 314 298 8757 • [www.stl-inc.com](http://www.stl-inc.com)**





**STL**

**ANALYTICAL REPORT**

**Bradley Landfill**

**Lot #: F3D090123**

**Bruce Matlock**

**Waste Management Disp. Serv. o  
9081 Tujunga Ave  
Sun Valley, CA 91352**

**SEVERN TRENT LABORATORIES, INC.**

**Billy Tierney  
Project Manager**

**April 11, 2003**

**Severn Trent Laboratories, Inc.  
STL St. Louis • 13715 Rider Trail North, Earth City, MO 63045  
Tel 314 298 8566 Fax 314 298 8757 • [www.stl-inc.com](http://www.stl-inc.com)**

**Case Narrative**  
**LOT NUMBER: F3D090123**

This report contains the analytical results for the sample received under chain of custody by STL St. Louis on April 9, 2003. This sample is associated with your Bradley Landfill project.

All applicable quality control procedures met method-specified acceptance criteria except as noted on the following page.

This report is incomplete without the case narrative. All chemical analysis results are based upon sample as received, wet weight, unless noted otherwise. All radiochemistry results are based upon sample as dried and ground with the exception of tritium, unless requested wet weight by the client.

Observations/Nonconformances

Reference the chain of custody and condition upon receipt report for any variations on receipt conditions and temperature of samples on receipt.

This sample was filtered and preserved at STL St. Louis before analysis.

Total Metals by EPA 200.7

The MS/MSD recoveries for potassium are outside the established QC limits. The potassium concentration in the original sample is greater than 4 times the amount spiked, making % recovery information ineffective. Method performance is demonstrated by acceptable LCS recovery. No further action is required.

Affected Samples:

F3D090123 (1): LEACHATE SUMP E

Gross Beta by EPA 900.0

The method calls for a 72 hour ingrowth period. Due to the rush request on these results, the ingrowth was not performed.

Affected Samples:

F3D090123 (1): LEACHATE SUMP E

# METHODS SUMMARY

F3D090123

<u>PARAMETER</u>	<u>ANALYTICAL METHOD</u>	<u>PREPARATION METHOD</u>
Cs-137 & Hits By Gamma	EPA 901.1 MOD	
Gross Alpha/Beta by GFPC	EPA 900.0 MOD	
Th230/Sr90-Y90 cal	EPA 906.0 MOD	
H-3 by Distillation & LSC	EPA 906.0 MOD	
by LSC		
Trace Inductively Coupled Plasma (ICP) Metals	MCAWW 200.7	MCAWW 200.7

## References:

EPA "EASTERN ENVIRONMENTAL RADIATION FACILITY RADIOCHEMISTRY PROCEDURES MANUAL" US EPA EPA 520/5-84-006 AUGUST 1984

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

# SAMPLE SUMMARY

F3D090123

<u>WO #</u>	<u>SAMPLE#</u>	<u>CLIENT</u>	<u>SAMPLE ID</u>	<u>SAMPLED</u>	<u>SAMP</u>
				<u>DATE</u>	<u>TIME</u>
FLJ5L	001	LEACHATE	SUMP E	04/08/03	16:05

**NOTE(S) :**

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP E

TOTAL Metals

Lot-Sample #....: F3D090123-001

Matrix.....: WATER

Date Sampled...: 04/08/03 16:05 Date Received...: 04/09/03

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
Prep Batch #....: 3099220						
Potassium	1220000	50000	ug/L	MCAWW 200.7	04/09-04/10/03	FLJ5L1AD
		Dilution Factor: 10		Analysis Time...: 11:33		

METHOD BLANK REPORT

TOTAL Metals

Client Lot #...: F3D090123

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
MB Lot-Sample #: F3D090000-220				Prep Batch #...: 3099220		
Potassium	ND	5000	ug/L	MCAWW 200.7	04/09-04/10/03	FLJ6R1AA
		Dilution Factor: 1				
		Analysis Time...: 11:24				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #...: F3D090123

Matrix.....: WATER

<u>PARAMETER</u>	<u>PERCENT</u> <u>RECOVERY</u>	<u>RECOVERY</u> <u>LIMITS</u>	<u>METHOD</u>	<u>PREPARATION-</u> <u>ANALYSIS DATE</u>	<u>WORK ORDER #</u>
------------------	-----------------------------------	----------------------------------	---------------	---	---------------------

LCS Lot-Sample#: F3D090000-220 Prep Batch #...: 3099220

Potassium 106 (85 - 115) MCAWW 200.7 04/09-04/10/03 FLJ6R1AC

Dilution Factor: 1 Analysis Time...: 11:29

**NOTE(S) :**

Calculations are performed before rounding to avoid round-off errors in calculated results.

MATRIX SPIKE SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #...: F3D090123

Matrix.....: WATER

Date Sampled...: 04/08/03 16:05 Date Received...: 04/09/03

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
MS Lot-Sample #:	F3D090123-001 Prep Batch #...: 3099220						
Potassium	236 N	(70 - 130)			MCAWW 200.7	04/09-04/10/03	FLJ5L1AF
	304 N	(70 - 130)	2.5	(0-20)	MCAWW 200.7	04/09-04/10/03	FLJ5L1AG

Dilution Factor: 10

Analysis Time...: 11:38

**NOTE(S) :**

Calculations are performed before rounding to avoid round-off errors in calculated results.

N Spiked analyte recovery is outside stated control limits.



WASTE MANAGEMENT DISP. SERV. OF CA

Client Sample ID: LEACHATE SUMP E

Severn Trent Laboratories - Radiochemistry

Lab Sample ID: F3D090123-001  
 Work Order: FLJ5L  
 Matrix: WATER

Date Collected: 04/08/03 1605  
 Date Received: 04/09/03 0900

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Prep Date	Analysis Date	Batch #	Yld #
GROSS A/B BY GFPC EPA 900.0 MOD				pCi/L		900.0 MOD		
Gross Beta	1290		140	40	04/09/03	04/10/03	3099161	
TRITIUM (Distill) by EPA 906.0 MOD				pCi/L		906.0 MOD		
Tritium	3810		440	140	04/09/03	04/10/03	3099361	
Gamma Cs-137 & Hits by EPA 901.1 MOD				pCi/L		901.1 MOD		
Potassium 40	1340		150	40	04/09/03	04/10/03	3099129	

NOTE(S)

Data are incomplete without the case narrative.

MDC is determined by instrument performance only.

Bold results are greater than the MDC

METHOD BLANK REPORT

Severn Trent Laboratories - Radiochemistry

Client Lot ID: F3D090123  
 Matrix: WATER

Parameter	Result	Qual	Total Uncert. (2 $\sigma$ +/-)	MDC	Lab Sample ID		
					Prep Date	Analysis Date	Batch # Yld %
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>					<b>F3D090000-161B</b>		
Gross Beta	-0.2	U	1.1	1.9	04/09/03	04/10/03	3099161
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>					<b>F3D090000-129B</b>		
Potassium 40	42	U	44	49	04/09/03	04/09/03	3099129
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>					<b>F3D090000-361B</b>		
Tritium	80	U	100	170	04/09/03	04/10/03	3099361

NOTE (S)

Data are incomplete without the case narrative.

MDC is determined using instrument performance only

Bold results are greater than the MDC

U Result is less than the sample detection limit.

# Laboratory Control Sample Report

## Severn Trent Laboratories - Radiochemistry

Client Lot ID: F3D090123

Matrix: WATER

Parameter	Spike Amount	Result	Total Uncert. (2 $\sigma$ +/-)	MDC	% Yld	% Rec	Lab Sample ID QC Control Limits
Gamma Cs-137 & Hits by EPA 901.1 MOD			pCi/L	901.1 MOD			F3D090000-129C
Americium 241	309000	290000	31000	200		94	(82 - 118)
Cesium 137	126000	119000	14000	90		95	(90 - 110)
Cobalt 60	223000	213000	22000	100		95	(90 - 110)
	Batch #:	3099129		Analysis Date:	04/09/03		
GROSS A/B BY GFPC EPA 900.0 MOD			pCi/L	900.0 MOD			F3D090000-161C
Gross Beta	95.5	90.6	9.6	1.8		95	(79 - 116)
	Batch #:	3099161		Analysis Date:	04/10/03		
TRITIUM (Distill) by EPA 906.0 MOD			pCi/L	906.0 MOD			F3D090000-361C
Tritium	8380	8240	890	170		98	(73 - 109)
	Batch #:	3099361		Analysis Date:	04/10/03		

**NOTE (S)**

MDC is determined by instrument performance only  
 Calculations are performed before rounding to avoid round-off error in calculated results

**DUPLICATE EVALUATION REPORT**

**Severn Trent Laboratories - Radiochemistry**

Client Lot ID: F3D090123  
 Matrix: WATER

Date Sampled: 03/27/03  
 Date Received: 03/29/03

Parameter	SAMPLE Result	Total Uncert. (2σ+/-)	% Yld	DUPLICATE Result	Total Uncert. (2σ+/-)	% Yld	QC Sample ID Precision
<b>TRITIUM (Distill) by EPA 906.0 MOD</b>							
Tritium	12400	1300		12100	1300		F3C310113-001 3 %RPD
	Batch #:	3099361	(Sample)	3099361	(Duplicate)		
<b>GROSS A/B BY GFPC EPA 900.0 MOD</b>							
Gross Beta	205	25		200	25		F3D080115-001 2 %RPD
	Batch #:	3099161	(Sample)	3099161	(Duplicate)		
<b>Gamma Cs-137 &amp; Hits by EPA 901.1 MOD</b>							
Potassium 40	90	60		20 U	44		F3D080115-002 126 %RPD
	Batch #:	3099129	(Sample)	3099129	(Duplicate)		

**NOTE(S)**

Data are incomplete without the case narrative.

Calculations are performed before rounding to avoid round-off error in calculated results

U Result is less than the sample detection limit.



LOS ANGELES COUNTY  
FEDERATION OF LABOR,  
AFL-CIO

May 29, 2003

Miguel Contreras  
Executive Secretary-Treasurer

Ricardo F. Icaza  
President

Jimmy Liao, Project Coordinator  
Environmental Review Section  
Planning Department  
City of Los Angeles  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Mr. Liao:

I am writing to you on behalf of the Los Angeles County Federation of Labor, AFL-CIO, representing 350 local unions and more than 800,000 union members, to express our strong support for Waste Management's Transition Master Plan for the Bradley Landfill and Recycling Center in Sun Valley. I also wish to urge you to measure the substantial economic impact this facility has on the lives of working families in the Northeast San Fernando Valley communities of the City of Los Angeles when assessing the environmental impacts of this project. The Bradley Landfill and Recycling Center has a long and proud record of providing employment, supporting organized labor, and being a solid corporate citizen.

Since Waste Management took over ownership of Bradley Landfill in 1986, it has increased the workforce to more than 200 workers, nearly all of which are members of Teamsters Local 396 and Operating Engineers Local 12. This represents a payroll in excess of \$4.3 million per year and expenditures in excess of \$6.5 million per year, nearly all of which occurs in Sun Valley and neighboring communities. These are truly good paying jobs in an area plagued by high rates of unemployment and high numbers of unskilled workers. The Bradley Landfill is one of the most significant and consistent sources of employment and economic stimulus in the Northeast San Fernando Valley. It is my understanding that funding for the transition from landfill to transfer and recycling is directly related to the extension of landfill operations until the year 2007. If this plan does not receive City approval, the landfill will close, over 200 jobs will be lost, and the area will lose one of its vital economic drivers. This simply cannot occur.

***The Los Angeles County Federation of Labor, AFL-CIO and I, personally, want to make it very clear that we wholeheartedly support the Transition Master Plan for the Bradley Landfill and Recycling Center. This is an issue of paramount importance to workers in the City of Los Angeles and the Northeast San Fernando Valley.***

2130 W. James M. Wood Blvd  
Los Angeles, CA 90006  
(213) 381-5611  
fax (213) 383-0772





LOS ANGELES COUNTY  
FEDERATION OF LABOR,  
AFL-CIO

Miguel Contreras  
Executive Secretary-Treasurer

Ricardo F. Icaza  
President

Labor's support for this Transition Master Plan is based on careful study of Waste Management's current operations and future plans, its ongoing commitment to community outreach, and its plan to form a Community Advisory group. Not only do its workers operate one of the cleanest and safest landfills in the country, but their plan to transition from active landfill operations to recycling and transfer operations is timely, well-conceived, and in lock-step with the City of Los Angeles' waste management needs. Not only will the Plan will ensure that the 200 plus current workers at the facility will remain on the job well into the future, but the Plan will create a state of the art, modern facility that meets the needs of diverse constituencies. The Plan helps current businesses and residents meet their increasing need for recycling and disposal services, helps other haulers -- including those employed by the City of Los Angeles -- by providing local disposal options, protects our environment by reducing overall truck traffic and emissions, and continues to provide the City's budget with badly needed revenue through permit and license fees.

On behalf of the Los Angeles County Federation of Labor, AFL-CIO, I urge you to take into consideration the tremendous contributions the Bradley Landfill and Recycling Center has upon the quality of Life of the Northeast San Fernando Valley when evaluating the potential impacts of this proposal.

Sincerely,

Miguel Contreras  
Executive Secretary-Treasurer

MCjt.opciu537  
AFL-CIO, etc

2130 W. James M. Wood Blvd.

Los Angeles, CA 90006

(213) 381-5611

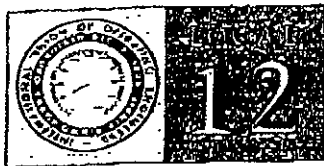
fax (213) 383-0772



1-708 1 02/02

+2133830772

05-31-03 02:34pm From-LOS ANGELES COUNTY FEDERATION



# International Union of Operating Engineers

AFL-CIO

Southern California & Southern Nevada

**WM. C. WAGGONER**  
Business Manager  
and  
General Vice-President

May 29, 2003

Mr. Jimmy Liao, Project Coordinator  
Environmental Review Section  
Planning Department  
City of Los Angeles  
200 N. Spring Street, Suite 763  
Los Angeles, California 90012

Dear Mr. Liao:

On behalf of Operating Engineers, Local 12, I wish to express my strong and unwavering support for Waste Management's Transition Plan for the Bradley Landfill and Recycling Center in Sun Valley. I urge you to measure the substantial economic contribution this facility has on the lives of working families in the Northeast San Fernando Valley communities of the City of Los Angeles when assessing the environmental impacts of this project. Local 12 represents over 23,000 members including many of the men and women working at the Bradley Center. Waste Management has a long history of running a clean and safe facility, being a good corporate citizen, and supporting Organized Labor.

I understand that the transition to transfer and recycling operations is contingent upon the extension of landfill operations through April 2007. Should Waste Management not receive this approval it would be forced to close the Bradley Facility. This must not happen.

Local 12 wholeheartedly supports the Transition Master Plan for the Bradley Landfill and the Recycling Center. This is an issue of paramount importance to workers in the City of Los Angeles and the Northeast San Fernando Valley. Anything short of full approval of this plan will have a tragically negative effect on working people and their families during these very tough economic times.

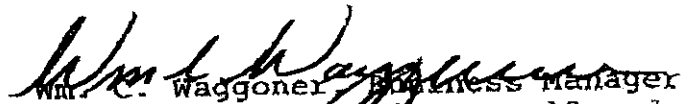
*International Union of Operating Engineers*

Mr. Jimmy Liao, Project Coordinator  
Page Two  
May 29, 2003

On behalf of Operating Engineers Local 12 I urge you take into consideration the tremendous contributions the Bradley Landfill and recycling Center has upon the quality of life of the Northeast San Fernando Valley when evaluating the potential impacts of this proposal.

Thank you for your time and consideration.

Very truly yours,

  
Wm. C. Waggoner, Business Manager  
I.U.O.E., Local Union No. 12 and  
General Vice President

WCW:psh





**SERVICE EMPLOYEES  
INTERNATIONAL  
UNION - AFL-CIO**

1015 WILSHIRE BLVD.  
LOS ANGELES, CA 90017  
213/482-6660  
213/482-6673 FAX  
800-LOCAL347  
[www.seiu347.org](http://www.seiu347.org)

May 29, 2003

Jimmy Liao, Project Coordinator  
Environmental Review Section  
Planning Department  
City of Los Angeles  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES  
JUN 03 2003  
ENVIRONMENTAL  
UNIT

***RE: SEIU Local 347 supports Transition Master Plan for  
Bradley Landfill & Recycling Center***

Dear Mr. Liao:

On behalf of the members of SEIU Local 347, I am writing to express the Union's support for Waste Management's Transition Master Plan for the Bradley Landfill and Recycling Center in Sun Valley. Local 347 urges the Planning Department to include measurements of the substantial economic contribution this facility makes to the City of Los Angeles when assessing the environmental and overall impacts of this project. Local 347 represents 12,000 workers employed by over 20 municipalities, including the refuse drivers of the City of Los Angeles, many of whom make daily trips to the Bradley facility.

The Transition Master Plan will bring a clean, state-of-the-art transfer facility and recycling center to the Northeast San Fernando Valley. This is important to the members of the Union as the presence of a local facility of this type ensures that L.A. City refuse drivers are not forced into the role of long-haul drivers and protects the economic resources of the entire City.

***SEIU Local 347 strongly supports the Transition Master Plan  
for the Bradley Landfill and Recycling Center.***

Please consider these interests as the potential impact is evaluated and keep in mind the economic contributions provided to the communities of the Northeast San Fernando Valley by the Bradley Landfill and Recycling Center.

Thank you.

Sincerely,

Julie Butcher  
General Manager

*Fighting to Keep Public Services Public*



# V. J. TARANDEK

PROPERTY MANAGEMENT  
8426 SAN FERNANDO ROAD  
SUN VALLEY, CA, 91352  
818-771-0035  
FAX 818-771-0036

4-22-2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA, 90012

RE: EIR Case # ENV-2001-3267-EIR  
Bradley Landfill and recycling Center Transition Master Plan

Mr. Liao,

I am a property owner of 11782 Sheldon St., Sun Valley, CA 91352. My property consists of industrial units that are occupied by 14 small business owners and their employees.

I am completely against this project.

My tenants have had to deal with the foul smell, dust, cannon shots, bird waste and flying debris long enough. The fact that the current height of the landfill will not support the continued use though the established closure date of April 14, 2007 does not matter. Waste Management Recycling is a for profit business and the waste going into the dump is measured by the ton and has been paid for by their customers. The capacity of this dump is no magical number. They have taken in more then their site can support with-in the established closure date and they have profited significantly. Now its time for the local residents and other property owners in the area to realize a profit. Mainly through increases in property values. This will come when the dump is closed.

Please do not allow this project to move forward.

The city does not need extend this poorly managed waste site to make up for it lack of foresight. The waste needs to separated and recycled now, not 5 years from now. This would have extended the life of the waste site.

Sincerely

Vladimir Tarandek

**RECEIVED**  
CITY OF LOS ANGELES

APR 23 2003

ENVIRONMENTAL  
UNIT

11544 Sheldon St.  
Sun Valley, CA. 91352  
Re: EIR No. 2001-3267-EIR  
SCH No. 2002121027

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Given the information in the enclosed article, it would seem the EIR to be discussed at the Public Scoping Meeting April 24 would be a redundant matter ?!?

However, we would like to take this opportunity to, once again, express our most adamant opposition to any approval of expansion in area or operating time span. It has been our understanding this facility was to close this year, 2003. Yet the Waste Management went ahead and proceeded with a little bit here and a little bit there - and now wants approval - for not getting up front approval and wants to also continue operating until 2007. All this under the guise of not putting Waste Management personnel out of work. When 2007 comes to pass - will it be the same "sob story" ?!?

What about the people and businesses that have lived with all the Environmental Impacts for all past years. Pardon us if we feel, once again, that Government Bureaucracy is full steam ahead for whatever their agenda is. Let the majority "go jump in the dump" !!!

Sincerely -- *Philipp Bogna*  
*Nancy Bogna*

FAX 213-978-1341

May 29, 2003

Jimmy Liao, Project Coordinator  
Department of City Planning  
200 No. Spring Street - Suite 763  
Los Angeles, Ca 90012

RECEIVED  
CITY OF LOS ANGELES

JUN 03 2003

ENVIRONMENTAL  
UNIT

REF: Bradley Landfill ENV-2001-3267-EIR SCH NO. 2001121027

Dear Mr. Liao:


~~I am a concerned homeowner/business owner and citizen who would like to voice my objection to the above application in its entirety.~~

We already are living with a mountain of trash. Another 43 feet would be a significant impact on any aesthetic views of the mountains and forever mark Sun Valley's image as the trash capital of California. We are the home of some 17 landfills. This alone has had a significant impact on our property values. Bradley Landfill is already polluting our air and the higher up they go, the worse it gets.

Instead of a closure, which was promised, we have been asked to accept a Material Recycling Facility or Trash Transfer Facility. We have been dumped on enough! This facility will continue to increase the heavy truck traffic in Sun Valley along with pollution and the Bradley Landfill site will forever be a living reminder of a mountain of trash. This trash will be transferred by rail. This will create more traffic congestion as we will now have more train activity. Rail cars parked along San Fernando Road and cranes loading the rail cards with trash.

Enough is enough. Environmental impacts should be compared to what was promised, which is a closed facility, not justified by the fact that the trash will now be trucked out as well as in as though this will not impact the community. People refuse to improve an area that is nothing but an existing mountain of rubbish.

Sincerely,

  
Mary K Benson  
11070 Sheldon Street  
Sun Valley CA 91352  
818-767-5996

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring St., Suite 763  
Los Angeles, CA 90012

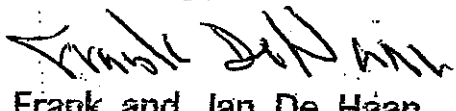
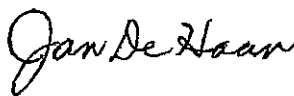
May 20, 2003

Dear Mr. Liao,

We strongly object to the so-called Transition Master Plan for the Bradley Landfill. To say "The land uses surrounding the BLRC consist primarily of industrial activities" misses the point. 86,391 people live in Sun Valley (2000 census), of which 33% are below 18 in age; that's 28.5 thousand young people and children. All of us, young and old, must breathe the fumes emanating from the dump as well as from the trucks bringing the trash to the dump. It's already an ugly tumor rising above the rest of Sun Valley. Why are we even considering raising it another 43 feet? And why is Sun Valley being chosen for this honor? Given we are 65.9% Hispanic, I suspect this is another glaring example of environmental racism.

As far as the proposed Materials Recovery Facility, why locate it in Sun Valley? No reason is given. Isn't it time we bite the bullet and give someone else a turn at breathing exhaust fumes from garbage trucks?

Sincerely,

Frank and Jan De Haan  
10937 Goss St.,  
Sun Valley, CA 91352

cc Councilman Tony Cardenas

Amy Hoang  
volygr1@ucla.edu  
9248 Oneida Avenue  
Sun Valley, CA 91352

May 21, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Sir:

Hello, I have lived in Sun Valley for more than 14 years. I am deeply concerned about the community's well being if the Bradley Landfills were to be granted an expansion. The 16 landfills have been actively receiving trash for decades now and it should have ended by this year.

I have learned a lot about human health risks from environmental hazards as a student at UCLA and the landfills contribute to the city's air pollution. Since they actively receive trash and wastes, the landfills are probably not covered and are not contained underground, which degrades the air quality to those living near by. There are residents living within 1 or 2 miles from the Bradley Landfill and can be or have already been negatively affected from these landfills.

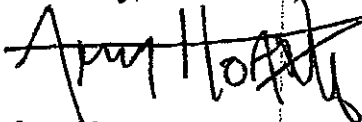
I know in the city's report, that was sent to Sun Valley residents, reported that the Bradley Landfill does not receive radioactive or hazardous wastes. However, there has been a recent discovery of radioactive waste as reported in the *Daily News of Los Angeles* (Cavanaugh, March 20, 2003).

Not only do the landfills concern me, but there are 2 chrome plating companies and the DWP's power plant operating in Sun Valley. If the chrome particles were to be uplifted into the air and residents breathe them in, they are breathing in very small particulate matter that can be deeply inhaled into the lungs and cause lung cancer.

I have recently visited teachers and students at J.H. Francis Polytechnic High School informing them about the expansion and they have also expressed concern about the Bradley Landfill to their health and to those they know and care about.

Please do whatever you can to see that the Bradley Landfill is not permitted to expansion. The residents of Sun Valley have already bared the burden of environmental injustices for decades now. Please change that. Thank you.

Sincerely,



Amy Hoang

LOS ANGELES UNIFIED SCHOOL DISTRICT  
John H. Francis Polytechnic High School  
12431 ROSCOE BOULEVARD  
SUN VALLEY, CALIFORNIA 91352  
A LEARN SCHOOL Cluster #8

May 21, 2003

Jimmy Liao, Project Coordinator  
Los Angeles Department of City Planning  
200 N. Spring Street, Suite 763  
Los Angeles, CA 90012

Dear Sir:

**Subject: Bradley Landfill**

I am deeply concerned about the pending expansion of the Bradley Landfill. The 16 landfills within the Bradley facility have caused our city's air to be degraded and the expansion may harm our water quality, which has been warned by the city of Los Angeles to have already been negatively affected. The landfills have been active for decades now and should be closed down soon before any environmental harms are to occur.

Please do take my concern into consideration. For I am taking not only my health, but my friends, family and the city of Sun Valley's well being into consideration also. Thank you for your time.

Sincerely,

J.H. Francis Polytechnic High School Students

A.H.

Name/Signature	Address	Date
1. Amy Hoang	9248 Oneida Ave., Sun Valley 91352	5/21/03
2. [Signature]	12547 Sheldon St.	5/21/03
3. [Signature]	8060 Vantage St.	5/21/03
4. Catherine Du		5-21-03
5. [Signature]		5-21-03
6. [Signature]	1048 Peoria St	5-21-03
7. [Signature]		5-21-03
8. Janet Flores		5/21/03
9. [Signature]		5/21/03
10. [Signature]		5-21-03
11. David Lam		5/21/03
12. [Signature]		5/21/03
13. [Signature]		5/21/03
14. John Ray Guzman		5/21/03
15. [Signature]		5-21-03
16. Maria Fernandez		5-21-03
17. [Signature]		5-22-03

Name/Signature	Address	Date
18. Jose Sanchez		5-21-03
19. <del>Ylana Sanchez</del>		5-21-03
20. <del>Tammy Harris</del>	9248 ONEDA AVE. SULLY AVE	5-21-03
21. Mariana Lopez		5-21-03
22. <del>[Signature]</del>		5-22-03
23. <del>[Signature]</del>		5-21-03
24. <del>[Signature]</del>		
25. <del>[Signature]</del>		
26. Luis Garcia		5/21/03
27. Charles Lewis	OSBOURNE ST.	5/21/03
28. MONICA SANCHEZ		
29. <del>[Signature]</del>		
30. <del>[Signature]</del>		
31. <del>[Signature]</del>		
32. <del>[Signature]</del>		
33. <del>[Signature]</del>		
34. DAVID BART		
35. erika garcia		5-22-03
36. guelda garcia		5/22/03
37. <del>[Signature]</del>		
38. <del>[Signature]</del>		
39. <del>[Signature]</del> CARLOS SULLY		5-21-03
40. <del>[Signature]</del>		5-21-03
41. <del>[Signature]</del>		
42. <del>[Signature]</del>	9248 ONEDA AVE.	5-21-03
43. CHAS WOODS		
44. <del>[Signature]</del>		
45. Brenda Flores		
46. <del>[Signature]</del>		
47. <del>[Signature]</del>		
48. <del>[Signature]</del>		
49. <del>[Signature]</del>		5-21-03
50. MARIA ESCOBAR		
51. <del>[Signature]</del>		
52. <del>[Signature]</del>		
53. <del>[Signature]</del>		may
54. <del>[Signature]</del>		5-21-03



Name/Signature	Address	Date
55. <del>Orlando Hernandez</del>	12357 Acoluor St.	5-22-03
56. <del>Yimi Fleas</del>		
57. <del>Bryan</del>		5-22-03
58. <del>Yvonne Nicolas</del>		
59. <del>Colin Lewis</del>		
60. <del>Vanessa Avila</del>		
61. <del>Palma Mendoza</del>		
62. <del>Adriana</del>		
63. <del>Adriana</del>		
64. <del>Adriana</del>		
65. <del>Adriana</del>		
66. <del>Jorge Espino</del>		
67. <del>Adriana</del>		
68. <del>Adriana</del>		
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72. <del>Adriana</del>		
73. <del>Adriana</del>		
74. <del>Seve madrona</del>		
75. <del>Marta Fernandez</del>		5-21-03
76. <del>Adriana</del>		5-21-03
77. <del>Adriana</del>		
78. <del>SARA JOHNSON</del>		
79. <del>Kate Rio</del>		
80. <del>Adriana</del>		
81. <del>Adriana</del>		
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88. <del>Adriana</del>		
89. <del>Adriana</del>		
90. <del>Adriana</del>		
91. <del>Adriana</del>		

Name/Signature	Address	Date
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92.	<del>PO Box 1000</del>	
93.	<del>PO Box 1000</del>	5-22-03
94.	Anthony Jesus	

95.	<del>PO Box 1000</del>	
96.	<del>PO Box 1000</del>	
97.	<del>PO Box 1000</del>	
98.	PACIFIC	5/21/03
99.	<del>PO Box 1000</del>	

100.	<del>PO Box 1000</del>	
101.	<del>PO Box 1000</del>	
102.	Steve D'Ardes	

103.		
104.	Jimmy Moran	

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12412 Truesdale St.  
Sun Valley, California 91352

May 20, 2003.

Dear Jimmy Liao

It has come to my attention that Sun Valley may become the site of hazardous waste dumping. As a resident for 25 years, my family and I are very concerned about the pollution and environmental harm that will result from such actions.

I urge you to represent the health and well being of this community by reconsidering this idea.

Sincerely,

Supit Pumpuang

**Supit Pumpuang**  
12412 Truesdale St.  
Sun Valley, CA 91352-1347

Date: June 5, 2003

To: Jimmy Liao  
Planning Department

From: Wayne Tsuda  
Local Enforcement Agency Program

Subject: Comments on the Bradley Landfill and Recycling Center  
Proposed Expansion Notice of Preparation and Initial Study

Please note: These comments were developed by the Local Enforcement Agency and reflect analytical comments from this perspective.

## **I. GENERAL COMMENTS**

The NOP states that the Transfer Station/MRF structure is a three-sided building with one side open towards the landfill. It is recommended that during Phase II of the project the Transfer Station/MRF structure is a fully enclosed building. A fully enclosed structure with adequate lighting, a negative pressure system, misters and adequate ventilation is the most effective engineering control in mitigating air quality and noise impacts.

The IS relies heavily on LEA permit conditions as mitigation measures under landfill's Solid Waste Facility Permit (SWFP) # 19-AR-0008. Note that in accordance with CEQA, merely complying with regulatory standards is not mitigation. SWFP permit conditions should not be used to justify a no impact determination. Operator compliance with permit conditions is not always the case. A history of complaints and inspection violations should be analyzed. A discussion of all mitigation measures both current and proposed should be discussed in the EIR.

The EIR should include a discussion of impacts associated with the continuation of the landfill for an additional four years. Under existing conditions, the landfill would reach capacity in 2003. Note that the existing conditions are those that exist at the time the NOP is released to the public.

The NOP and IS do not provide a list of potential project alternatives. Alternatives should be addressed for both Phase I and Phase II of the project, both separately and together. This is a critical part of the CEQA process.

The project description is not clear regarding the timing of Phase 2 in relation to Phase 1. The project description in the EIR should provide clarification and an anticipated schedule for build-out of each Phase. The EIR should also provide an analysis of both project phases together as well as an analysis of each phase separately, since one phase could theoretically occur without approval of the other phase.

## II. AESTHETICS

- Section 1c (Visual Character): The Initial Study Checklist is marked potentially significant unless mitigated and will be discussed in the EIR. This should be marked a potentially significant impact and a detailed analysis should be discussed in the EIR. This expansion will create a large mound or hill in the Eastern San Fernando Valley that can be viewed for miles in all directions. It will be difficult to fully mitigate the visual impacts of Phase I. The EIR should also address potential visual impacts of Phase II in the EIR, including any operational activities that may be conducted outside of buildings and that may be viewed from areas outside the BLRC. Mitigation measures should be discussed for any potential impacts like what is stated in III b and III e of the environmental evaluation.
- Section 1d (Light and Glare): The Initial Study concludes that light and glare impacts associated with the project would be less than significant. The Initial Study Checklist should be marked potentially significant unless mitigated and will be discussed in the EIR. The Initial Study states that, "in the event that landfill operations occur at night". Landfill operations currently occur at night on a regular basis and will be allowed to continue according to the NOP. In addition the landfill will be expanded 43 vertical feet. This will make it approximately 143' higher than street level. At this height lights from nighttime operations can be potentially seen for miles away. The IS states that during Phase II of the project the open side of the transfer station will face towards the landfill, and concludes that effects of new lighting sources would "not likely be perceptible outside of the project site. The NOP, however, states that operations will occur until 12:00 am. Lights from transfer operations and vehicle traffic could potentially be seen from off site. The issue should be addressed in the EIR. The EIR should include a discussion of proposed hours of operation (and therefore, operational lighting) of Phase II in relation to the existing setting.

## III. AIR QUALITY

- Sections IIIb (Violation of Air Quality Standards), IIIc (Increased Emissions of Criteria Pollutants), and IIId (Pollutant Concentrations): The IS does not mention mitigation measures. The EIR should discuss mitigation measures in detail and how they will reduce impacts to a level of insignificance. The EIR should also include a Health Risk Assessment, which includes an assessment of the potential impacts of Toxic Air Contaminants on surrounding sensitive uses.
- Section IIIc (Increased Emission of Criteria Pollutants): It is unclear whether the methane issue will be discussed in the EIR. The EIR should include a discussion of existing and project-generated methane gas, and discuss the extent to which the existing system is sufficient to handle the proposed increases in methane gas. The EIR should also discuss the extent to which its network of collection wells, header pipes, and three flares adequately controls existing landfill gas emissions and migration, and show why the systems are considered adequate for 4.7 million cubic yards of additional waste.

- JUN 9 2005 12:14 P.04
- Section IIIe (Odors): The IS states that existing measures required by the landfill's Solid Waste Facility Permit 19-AR-0008 would apply to the Phase I project and that the existing landfill gas collection system mitigates odors associated with landfill gas. Even with current mitigations in place Bradley landfill still gets a substantial amount of odor complaints. SCAQMD is inundated with odor complaints on Bradley monthly and has issued inspection violations to them in the past. The Initial Study Checklist is marked potentially significant unless mitigated. This should be marked a potentially significant impact with a detailed discussion in the EIR. The EIR should discuss the adequacy of the existing gas collection system for both the existing landfill and proposed Phase I and Phase II expansion of the landfill. This discussion should include any SCAQMD violations, odor complaints that have been filed and remedial action taken. Additional mitigation measures should be recommended for any identified potential odor impacts. Phase II of the project states that the Transfer Station/MRF structure is a three-sided building with one side open towards the landfill. It is recommended that during Phase II of the project the Transfer Station/MRF structure is a fully enclosed building with negative pressure system and misters to mitigate odor impacts.

#### IV. GEOLOGY AND SOILS

- Section VIa (Ground shaking): Section VIa of the IS states that under Phase I, continuation of the existing landfill operation and closure activities would not involve any new structures that would be affected by seismic ground shaking. The expanded landfill is a structure in itself. The landfill will increase vertically by 43'. This will be a 43% increase in height over the existing street level. This makes the landfill a higher, larger structure than before and potentially more susceptible to ground shaking. The EIR should discuss this issue in detail and indicate potential mitigation measures.
- Section VIa (Landslides): This should be marked a potentially significant impact and a detailed analysis should be discussed in the EIR. This expansion will create a much larger mound. The landfill itself can potentially landslide during an earthquake or wash out. Section VIa of the IS states that under Phase I, engineered slopes that are resistant to potential landslides would continue to be constructed until the landfill is closed. Section VIc states the slopes would be "designed for stability". These are mitigation measures. The EIR should discuss this issue and indicate how this applies to the proposed increase in height of 43'.
- Section VIb (Erosion): The Initial Study concludes that erosion associated with the project would have no impacts. The Initial Study Checklist should be marked potentially significant unless mitigated and should be discussed in the EIR. The Initial Study states that any potential impacts related to soil erosion from existing landfill operations will be mitigated to a level less than significant by presently imposed mitigation measures. The EIR needs to address whether the existing erosion control measures have been adequate for the existing landfill operations.

This should include a discussion of any additional mitigation measures as may be deemed necessary.

## V. HYDROLOGY AND WATER QUALITY

- Sections VIIIa (Water Quality Standards), and VIIIb (Water Quality): The IS states that all areas of Bradley West and West Extension are equipped with a liner and leachate collection and removal system. The IS also states that the existing liners would be capable of handling the additional weight of waste and leachate generation such that the proposed project would not affect groundwater quality. The IS does not provide any information supporting the conclusion that the existing liners would be adequate for the proposed project. The EIR should discuss this issue in depth and include a discussion of the potential impacts of the additional 4.7 million cubic yards of waste and associated leachate generation.

## VI. TRANSPORTATION AND TRAFFIC

- The IS states that under Phase I, landfill operations would continue to occur at current traffic volumes. However, note that CEQA requires that the proposed project be assessed against existing conditions. The existing condition is that the landfill would close when it reaches capacity in 2003. Therefore, the EIR needs to include a discussion regarding the continuation of the existing traffic levels for another four years, until closure in 2007.

## VII. UTILITIES AND SERVICE SYSTEMS

- Section XVIg (Solid Waste). The IS states that under Phase I, existing landfill operations would continue and existing mitigation measures would remain in effect. The IS concludes that no impacts related to solid waste regulations would occur. The EIR should discuss the adequacy of the existing control measures at this facility including complaints and compliance history. As stated before, mere compliance with a regulation does not constitute mitigation for any potential impacts, and does not obviate the need for environmental assessment.