Draft
Environmental Impact Report

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Athens Sun Valley Material Recovery Facility

Prepared for

Athens Services
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Executive Summary

Overview

The purpose of the Executive Summary and impact summary tables is to provide the reader with a brief overview of the proposed Athens Sun Valley Material Recovery Facility (Project), the anticipated environmental effects, and the potential mitigation measures that could reduce the severity of the impacts associated with the Project. The City of Los Angeles, Environmental Affairs Department (EAD), as lead agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code Sections 21000 et seq., the State CEQA Guidelines, 14 CCR Sections 15000 et seq. and the City of Los Angeles, Environmental Quality Act Guidelines (Adopted July 31, 2002).

This EIR is an informational document that is being used by the general public, utility providers, and governmental agencies to review and evaluate the Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project and alternatives. The complete EIR should be consulted for specific information about the environmental effects and the implementation of associated mitigation measures.

The Athens Sun Valley Materials Recovery Facility (ASVMRF) is located on an approximately 4.9 acre parcel in the Sun Valley community within the San Fernando Valley portion of the City of Los Angeles. The facility would process a total of 1,500 tons of solid waste and recyclables per day. Of the total, 1,000 tpd would be municipal solid waste (MSW) and 500 tpd would be construction and demolition (C&D) materials. MSW and C&D would be processed in separate enclosed buildings. The facility currently processes approximately 400 tpd of C&D materials and operates under Conditional Use Permit (CUP) (ZA 98-0427) issued in January 1999.

Following are the major Project components:

- In compliance with the July 29, 2004 Stipulated Judgment, recovery operations, for both C&D and MSW, will take place in covered buildings with misting and forced air ventilation systems.
- The size of proposed buildings and site activities include:
  - Transfer Station Building/MRF Building — 44,200 square feet
  - C&D Processing Building — 18,045 square feet
  - Landscape — 5,026 square feet
  - Hardscape — 149, 457 square feet
- No change in the hours of operation is proposed. In accordance with the existing CUP, the facility will operate from 7 a.m. to 8 p.m. daily.

- In accordance with the Stipulated Judgment, a 2 kilowatt solar power system will be constructed on the site to provide a portion of the electrical demand for the project.
- In accordance with the State Minimum Standards for Operating C&D and MRF/Transfer Stations, the following environmental control measures will be implemented:
  - Hazardous Materials: A load check program will be implemented by the operator to randomly check one C&D load per day and one MRF/Transfer load per day. Any small quantities of household hazardous waste (HHW) detected in incoming loads will be brought to the existing on-site HHW storage container, segregated by class and manifested in accordance with Federal and State regulations. Only employees with proper training will handle HHW. A spill response kit will be located in the storage container to include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles and respiratory equipment. Periodic additional random load checks may be required by the regulatory entity, the Local Enforcement Agency, as part of their inspectional procedures.
  - Odor Control: Odor control will be achieved by moving operations indoors within enclosed buildings with forced air ventilation systems. In addition, odors will be limited by the use of an odor neutralizer as part of the misting system and removal of any non-salvageable waste within 48 hours of its receipt on a first-in, first-out basis.
  - Dust Control: Dust control will be achieved by moving operations indoors within fully enclosed buildings with manual and automatic misting systems. In addition, outdoor C&D operations will be halted during periods of extreme wind conditions. As recommended by the SCAQMD, extreme wind conditions are defined as instantaneous wind speeds that exceed 25 mph. In addition, an automatic sweeper will be used to clean the tipping floors, outside the buildings and around the perimeter of the facility on a daily basis.
  - Litter Control: Litter control will be achieved by moving operations indoors within fully enclosed buildings. In addition, a cleanup crew will be assigned to maintain the facility and the ingress/egress street free of litter on a daily basis. All transfer vehicles and trucks utilizing the facility will be required to be covered to prevent material from blowing from vehicles.
  - Vector Control: Moving operations indoors will significantly reduce the attraction and access of rodents, birds and insects to refuse at the existing facility. In addition, any non-salvageable waste will be loaded into transfer trailers and removed from the site within 48 hours on a first-in, first-out basis. AW will contract with a vector control company to eliminate potential vectors on an as-needed basis.
  - Air Quality Control: To reduce air emissions, the applicant will comply with South Coast Air Quality Management District (SCAQMD) requirements to install particulate traps on their refuse collection vehicles.

Environmental Impact Report Scope

This EIR examines potential short-term and long-term impacts of the Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the Project was implemented. The significance of each identified impact was determined primarily using either City *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles* (*Thresholds Guide*), CEQA Guidelines and/or by use of applicable criteria approved by regulatory agencies (e.g. SCAQMD).

EIRs determine the significance of impacts by measuring or comparing the difference between "baseline conditions" and conditions that would occur with the development of the project. In accordance with CEQA Guidelines Section 15125(a), the existing physical conditions of a site "will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." The purpose of establishing a baseline is to ensure that the evaluation of impacts compares what will happen if the project is built with what will happen if the site is left alone. The situation presented by this Project is somewhat different because the Project applicant already has been issued a CUP by the City and has a vested right to operate a facility at the site. The project did not require a state-mandated permit for its recycling activity when the CUP was approved by the City.

The proposition that a lead agency may sometimes choose a baseline other than existing physical conditions is implicit in the *Guidelines* statement that existing physical conditions are "normally" the baseline. And indeed, in special situations, lead agencies have used and courts have upheld the use of, other baselines. In particular, where projects have undergone earlier, final, CEQA review and involve permits that have already been issued or rights that have vested at the time the new project is considered, the "actual physical environment includes that which… [the applicant] has a legal right to build under permits that have already been issued." *Benton v. Board of Supervisors*, 226 C.A.3d 1467, at 1477, fn. 10 (1991). Similar conclusions were reached in *Temecula Band of Liuiseno Mission Indians v. Rancho California Water District*, 43 C.A. 4th 425 (1996) and *Fairview Neighbors v. County of Ventura*, 70 C.A. 4th 238 (1999).

To be comprehensive and thoroughly analyze important impacts from the project this EIR uses two baselines. For each environmental impact topic (such as air quality and noise), the discussion of the environmental setting discusses project impacts in terms of:

- Conditions related to processing 400 tpd of C&D as now occurs on the site. This baseline is referred to as the 400-tpd baseline throughout this EIR.
- The other baseline is referred to as the 1,500-tpd baseline. This baseline characterizes development in accordance with the project's existing entitlements and the Mitigated Negative Declaration (MND) approved to allow for this throughput in 1999.

The discussion of environmental impacts identifies impacts and mitigation measures associated with measuring the Project against both baselines.

The EIR also presents alternatives to the Project, including the "No Project" alternative, and a qualitative assessment of the impacts that would be associated with the implementation of each. Finally, the cumulative impacts of the Project when added to other local proposed or approved projects were also evaluated. Cumulative impacts are assessed using both methodologies approved in the *CEQA Regulations*, using a list of proposed and recently approved projects obtained from the City and using applicable sections of Sun Valley La Tuna Canyon Community Plan.

Notice of Preparation

On March 13, 2007, the EAD distributed a Notice of Preparation (NOP) describing the Project for review by affected state, county, and city agencies, utility providers, interested organizations, and the general public. In addition to obtaining written comments on the NOP, a public scoping meeting was held on April 4, 2007. The meeting provided an opportunity for affected public agencies and the public to express concerns about the project and issues that should be addressed in the project EIR. All comments (written, e-mail, and verbal) were considered as part of preparation of this EIR.

Summary of Project Impacts

The significance of each impact resulting from implementation of the Project has been determined according to the City's *Thresholds Guide*, CEQA thresholds or thresholds of applicable regulatory agencies. The EIR identifies the following significant, unavoidable impacts which cannot be mitigated to a less than significant level:

- When measured against the 400-tpd baseline, the project results in significant, unavoidable NO_x and VOC emissions. Using this baseline, the project would also have a potentially significant cumulative impact on ozone concentrations due to VOC and NO_x emissions.
- When measured against the 400-tpd baseline, the incremental increase in diesel particulate emissions would be expected to have a cumulative impact to air quality.

The rest of the Project impacts have been found to be mitigable to acceptable levels, adverse but less than significant, or they have been identified as beneficial impacts. Table ES-1 (Summary of Impacts and Mitigation Measures), provided at the end of this section, presents a summary of the environmental impacts that would result from the proposed Project. It is organized to correspond with the environmental issues discussed in Section 3.0 Environmental Setting, Impacts, and Mitigation Measures.

Tables ES-1 is arranged in five columns: (1) each impact is identified using the same impact number used in Section 3 of the EIR, (2) each impact is described, (3) whether or not the impact is significant prior to mitigation is noted; (4) mitigation measures that would avoid or reduce the level of impacts are listed; and (5) the level of significance after implementation of mitigation measures is noted. Where no mitigation is required, it is noted in the table.

Summary of Project Alternatives

Project alternatives were selected to mitigate significant impacts identified in the analysis of environmental impacts. The following alternatives were evaluated in Section 4 of the EIR:

No Project Alternative

CEQA requires that the No-Project alternative be evaluated in all EIRs. Since the project now operates in accordance with a CUP, the no project alternative is the level at which the facility can operate without obtaining a new discretionary impact that require environmental review under CEQA. Under, Title 14, Chapter 3, Section 5.9, Section 17383.5 of the Public Resources Code (PRC) the facility could be classified as a Medium-Volume Construction and Demolition and Inerts Processing Facility if the throughput does not exceed 175 tons per day. Accordingly, the no-project alternative is defined as a 175-tpd C&D processing operation.

1,500-tpd MSW Alternative

As indicated above, the project will result in significant unavoidable air quality impacts when compared to the 400-tpd baseline. When compared to the 1,500-tpd baseline the analysis shows that air quality impacts are less than significant because the baseline involves the use of heavy duty vehicles which characterize C&D hauling operations which are replaced with medium-duty vehicles which are typically used in the collection of MSW. Medium duty vehicles typically carry 10 tons per load while the C&D vehicles average 5 tons per load. Accordingly, each MSW vehicle trip eliminates two C&D trips. Since emissions are also a function of vehicle horsepower, the smaller MSW vehicles have lower emission factors than heavy-duty C&D vehicles.

Environmentally Superior Alternative

As discussed in Section 4, the No-Project alternative may result in more emissions than the project because it would result in more long-distance MSW trips traveling greater distances to local landfills. The No Project alternative is, therefore, not considered environmentally superior to the project.

The 1,500-tpd MSW alternative may also result in increased emissions compared to the project as C&D trips are diverted to other existing facilities. Because this alternative does not reduce significant unavoidable project impacts and is not consistent with the project objective to provide both C&D and MSW diversion facilities, this alternative is not considered environmentally superior to the project.

TABLE ES-1
Summary Impacts and Mitigation Measures

Impact	Impact Summary	Significant	Mitigation Measure Summary	Residual Impact
VIS-1	During construction, direct lines of sight of equipment will be obstructed by intervening land uses, topography, and vegetation	No	No mitigation required	No Impact
VIS-2	The site is not visible from scenic roadways identified in the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan area.	No	No mitigation required	No Impact
VIS-3	Project views from north of the site are limited by mature vegetation that will remain with the project. Views from east limited by concrete block wall on project site. Project operations now visible will be indoors with the project.	No	No mitigation required	Less than significant
VIS-4	Under existing conditions and with the project, lighting limited to poles or wall-mounted security lighting focused downwards.	No	No mitigation required	Less than significant
AQ-1	Short-term Emissions from Construction would be less than SCAQMD regional and localized significance threshold.	No	No mitigation required	Less than significant
AQ-2	Diesel fueled collection and transfer trucks utilizing the Sun Valley MRF would be required to comply with mobile source control measures in the SCAQMD's 2007 Air Quality Management Plan.	No	No mitigation required	Less than significant
AQ-3	Based on results from the traffic study, the project would not significantly increase traffic at intersections near the project site. In addition, the project would not change the distance between the source of vehicle emissions and receptor locations.	No	No mitigation required.	Less than significant
AQ-4	Odors generated by receipt of MSW for the project would be less than significant because waste processed in building with forced air ventilation, filtration and misting system to mask odors. Also, operator required to submit Odor Management Plan for review and approval of LEA under SCAQMD Rule 410.	No	No mitigation required	Less than significant

TABLE ES-1
Summary Impacts and Mitigation Measures

Impact	Impact Summary	Significant	Mitigation Measure Summary	Residual Impact
AQ-5	Under the 400-tpd Baseline, Long-term Emissions of CO, SO_X, PM_{10}, and $PM_{2.5}$ will be less than SCAQMD localized and regional significance thresholds.	No	No mitigation required	Less than significant
AQ-6	Under the 400-tpd Baseline, Long-term Emissions of VOC and NO_X will exceed SCAQMD regional significance thresholds.	Yes	• Implement feasible NO_X emission reduction technologies, such as the Cleaire filter, to determine whether this would be an option for diesel-fueled trucks. • Maintain mobile equipment in tune with the manufacturer's specifications. • Maintain diesel-fueled collection and transfer trucks in tune with the manufacturer's specifications. • To the extent feasible, utilize alternative-fueled or electric mobile equipment.	Significant and unavoidable
AQ-7	Under the 400-tpd Baseline, increased diesel particulates are less than significant. Implementation of mitigation measures listed under AQ-6 would further reduce these emissions. However, with cumulative growth and development, increased diesel particulate emissions would be significant and unavoidable.	No	The mitigation measures listed under Impact AQ-6 would apply to Impact AQ-7. No mitigation measures are needed for diesel particulate matter.	Project impacts are less than significant. Cumulative impacts are significant and unavoidable.
AQ-8	Under the 1,500-tpd Baseline, Long-term Emissions of CO, NO_X, VOC, SOX, PM_{10}, and $PM_{2.5}$ would be less than under existing conditions and therefore less than SCAQMD localized and regional significance thresholds.	No	No mitigation required	Less than significant

TABLE ES-1
Summary Impacts and Mitigation Measures

Impact	Impact Summary	Significant	Mitigation Measure Summary	Residual Impact
AQ-9	Under the 1,500-tpd Baseline, Sensitive Receptors would be exposed to a net decrease in diesel particulate emissions that would be less than significant.	No	No mitigation required	Less than significant
NOI-1	Construction noise from the project site would increase ambient noise by approximately 2.5 dBA CNEL, less than the significance threshold of 5 dBA.	No	Construction contracts shall specify that all equipment must be equipped with mufflers and other applicable noise attenuation devices. Construction shall be restricted to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. Saturday, and prohibited at anytime on Sunday or a Federal holiday.	Less than significant
NOI-2	With the project, waste processing operations would occur indoors. With the 400-tpd baseline, receptor locations would experience a slight increase in noise but less than would be audible (3 dBA). Under the 1,500-tpd baseline, ambient noise at receptor locations would be slightly less than under existing conditions.	No	No mitigation required	less than significant
NOI-3	Traffic Noise	No	No mitigation measures are necessary because differences in traffic noise levels would not be detectable to people residing in areas near roadways traveled by Project traffic.	less than significant
POP-1	Under the 400-tpd baseline employment at the project site would increase from 32 approximately 65. Under the 1,500-tpd baseline, employment at the site would increase from 62 to 65. It is anticipated that project jobs would be taken by the existing labor force. The project is not expected to attract people from outside the local labor force.	No	No mitigation required	Less than significant

TABLE ES-1
Summary Impacts and Mitigation Measures

Impact	Impact Summary	Significant	Mitigation Measure Summary	Residual Impact
POP-2	Because the project will not induce employment growth, the project will also not increase the demand for housing near the project site.	No	No mitigation required	Less than significant
WAT-1	During construction, the project will comply with National Pollution Discharge Elimination System Requirements to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) to include best management practices to limit surface runoff during construction.	No	No mitigation required	Less than significant
WAT-2	Under both baselines, the project is not anticipated to change the site topography or increase the amount of impermeable surface to result in increased surface runoff.	No	No mitigation required	Less than significant
WAT-3	Under both baselines, waste processing operations will be moved indoors reducing potential contact between waste and rainwater. This should reduce loadings of total suspended solids (TSS) and total dissolved solids (TDS) in runoff. Indoor operations will also make it easier to control leakage of fuel, oil, grease from equipment operating at the site.	No	No mitigation required	Less than significant
TR-1	Under the 400-tpd baseline, with or without the Bradley project, the project does not result in a significant impact at any of the ten intersections assessed in the traffic study.	No	No mitigation required	Less than significant
TR-2	Under the 1,500-tpd C&D Baseline, the project results in less trips than under existing conditions. With or without the Bradley project, the project impact is less than significant.	No	No mitigation required	Less than significant
TR-3	The Congestion Management Plan Impact of the project is less than significant because the project does not add more than 50 peak trips at the nearest CMP arterial monitoring intersection or 150 peak trips at a CMP monitoring location.	No	No mitigation required	Less than significant

SECTION 1

Introduction

1.1 Purpose of the EIR

This Environmental Impact Report (EIR) has been prepared to analyze and evaluate the environmental impacts and recommend mitigation measures concerning a proposed solid waste facility permit for the proposed Athens Sun Valley Material Recovery Facility (MRF) Project (Project) operated by the applicant, Arkaelian Enterprises, Inc., doing business as Athens Services (Athens). This Project will involve the recycling and transfer of up to 1,000 tons per day (tpd) of municipal solid waste (MSW) and 500 tpd of construction, demolition and inert materials (C&D). Athens currently operates under a Conditional Use Permit (CUP) that was issued in 1999 which permits the existing facility to process up to 1,500 tpd of mixed waste and C&D waste. Currently, approximately 400 tpd of C&D materials are processed at the site.

Please note that the existing CUP does not regulate the waste streams received at the Project site. The CUP (CUP ZA 98-0247) authorizes the land use for the "establishment, use and maintenance of a Recycling Materials Process and Sorting Facility (Recycling Center) for mixed waste, construction and demolition waste for the purpose of depositing, sorting, processing and transfer of sorted waste, in the M2-1G Zone." and establishes general limits on the operation of the facility, such as tonnage and hours of operation consistent with that zone. Other agencies with specific authorities such as the Local Enforcement Agency and California Integrated Waste Management Board regulate operations that handle recyclable materials or wastes processed and transported from the site. This EIR will be used by these agencies to provide information to determine the environmental impacts associated with their regulatory permitting responsibilities.

In addition to the CUP, the facility recently obtained a Temporary Solid Waste Facilities permit, issued pursuant to Title 14, Section 18218.7 of the California Code of Regulations (CCR) by the City of Los Angeles, Environmental Affairs Department on July 16, 2008. This permit authorizes the continuation of existing C&D processing operations, with a throughput of 400 tpd, until June 10, 2010.

This EIR has been prepared in accordance with provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines (*Guidelines*) published by the State Resources Agency (California Administrative Code, Section 1500 *et seq.*). In accordance with Section 15121(a) of the *Guidelines*, the purpose of an EIR is to serve as an informational document that:

> *…will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant impacts, and describe alternatives to the project.*

In accordance with the *Guidelines*, the overall purpose of this EIR to identify the potential significant effects of the proposed Project, identify feasible mitigation measures to reduce or

avoid significant impacts and to evaluate alternatives to the Project. This EIR is also required to evaluate the direct, indirect, and cumulative impacts of the Project. This EIR has been prepared to be understandable to the public. However, due to the subject matter of this document, various technical terms are used throughout the EIR. A glossary to technical terms and acronyms is included in Section 10 to aid in the understanding of these terms.

Please note that Section 15151 of the *Guidelines* includes the following standard of EIR adequacy:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision, which intelligently takes account of environmental consequences. An evaluation of environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection, but for adequacy, completeness and good faith effort at full disclosure.*

1.2 Lead Agency

Pursuant to Section 15367 of the *Guidelines*, the lead agency for this EIR is the City of Los Angeles, Environmental Affairs Department (EAD) because EAD has the greatest degree of discretion to approve or deny the Project. Under authority granted by the California Integrated Waste Management Board (CIWMB), EAD is the designated Local Enforcement Agency (LEA) responsible for issuing and enforcing the terms of Solid Waste Facility Permits for privately operated solid waste facilities in the City of Los Angeles.

Other responsible agencies may use this EIR as the basis for their decisions to issue other approvals or permits that may be required for the Project. Section 15381 of the *Guidelines* defines a "responsible agency" as *"…all public agencies other than the lead agency with discretionary approval power over the project."* Additionally, Section 15386 defines a "trustee agency" as one having jurisdiction over natural resources affected by a project.

1.3 Study Issues and Potential Areas of Controversy

This EIR analyzes the potentially significant environmental impacts identified by the lead agency with input from other sources. It also evaluates issues raised at a public scoping meeting held April 7, 2007, at a community recreational center near the Project site. Appendix A of this EIR includes the Notice of Preparation (NOP) for this EIR, circulated by City staff on March 12, 2007, and written comments received at the scoping meeting.

Based on the NOP and the written comments received at the scoping meeting, this EIR addresses the following potentially significant effects of the Project:

- Population and Housing
- Noise
- Visual/Aesthetics (including light and glare)
- Traffic and Circulation

- Air Quality
- Water Quality (Surface Drainage)

These topics are fully evaluated in Section 3 of this EIR, which also includes a subsection that provides documentation of why other potential impacts are not considered significant.

1.4 Contents of the EIR

This EIR is organized into the following sections.

Section ES, Executive Summary: This section summarizes the Project and the regulatory requirements for the Project; it identifies the environmental impacts that would result from the implementation of the Project; mitigation measures to reduce, avoid, or eliminate impacts; and alternatives to the Project.

Section 1, Introduction: This section provides an introduction and overview that describes the intended use of the EIR and authority under CEQA.

Section 2, Project Description: This section describes the major design and operational features of the Project and includes an identification of Project objectives.

Section 3, Environmental Setting, Impacts and Mitigation Measures: This section includes the environmental analysis of potentially significant impacts by issue area (such as air quality, noise). This section is divided into subsections, which include a description of the environmental setting; a discussion of the regulatory setting; an evaluation of the impacts and the level of significance prior to the implementation of mitigation measures; the identification of mitigation measures; and a determination of whether mitigation measures reduce the impact to a less than significant level. Cumulative impacts are also described for each issue area.

Section 4, Alternatives: This section compares the impact profile of the Project to the impacts of a reasonable range of alternatives, including a no-project alternative. As required by CEQA, this section also indicates whether alternatives are environmentally superior to the Project.

Section 5, Growth-inducing Impacts: This section discusses the potential for this Project to directly or indirectly induce new development.

Section 6, Significant Irreversible Impacts: This section discusses whether the Project involves the significant use of nonrenewable resources or will contribute to significant irreversible environmental effects.

Section 7, Climate Change and Greenhouse Gases: This section provides a discussion of the Project's effect on climate changes and greenhouse gases (GHG).

Section 8, Environmental Justice: Although not required under CEQA, this section discusses whether Project impacts would have disproportional effects on minority or low income populations.

Section 9, List of Preparers and Organizations Consulted: This section identifies persons and organizations involved in the preparation of the EIR and those agencies contacted in obtaining the information needed to prepare this document.

Section 10, Acronyms and Abbreviations: This section is a glossary that defines technical terms used in the document.

Appendices: Appendices for this EIR include the NOP, written comments at the scoping meeting, and technical studies (traffic) used to prepare this EIR.

1.5 Key Aspects of this EIR

EIRs determine the significance of impacts by measuring or comparing the difference between "baseline conditions" and conditions that would occur with the development of the project. In accordance with CEQA Guidelines Section 15125(a), the existing physical conditions of a site "will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." The purpose of establishing a baseline is to ensure that the evaluation of impacts compares what will happen if the project is built with what will happen if the site is left alone. The situation presented by this Project is somewhat different because the Project applicant already has been issued a CUP by the City permitting the existing facility to process up to 1,500 tpd of solid waste and has a vested right to operate such a facility at the site. Additionally, the City certified a negative declaration in support of the CUP approval, which explicitly analyzed potential environmental impacts that the facility would produce as it processes up to 1,500 tpd of solid waste. The Project did not require a state-mandated permit for its recycling activity when the CUP was approved by the City.

The proposition that a lead agency may sometimes choose a baseline other than existing physical conditions is implicit in the *Guidelines* statement that existing physical conditions are "normally" the baseline. And indeed, in special situations, lead agencies have used and courts have upheld the use of, other baselines. In particular, where projects have undergone earlier, final, CEQA review and involve permits that have already been issued or rights that have vested at the time the new project is considered, the "actual physical environment includes that which… [the applicant] has a legal right to build under permits that have already been issued." *Benton v. Board of Supervisors*, 226 C.A.3d 1467, at 1477, fn. 10 (1991). Indeed, "[w]here prior environmental review has occurred, . . . the existing environmental setting may include what has been approved following CEQA review." *Communities For a Better Environment v. South Coast Air Quality Management District,* 158 C.A. 4th 1336, __; 71 C Cal. Rptr. 3d 7, 26 (2008). Similar conclusions were reached in *Temecula Band of Liuiseno Mission Indians v. Rancho California Water District*, 43 C.A. 4th 425 (1996) and *Fairview Neighbors v. County of Ventura*, 70 C.A. 4th 238 (1999).

For this Project, the facility is already operating in accordance with an approved CUP, which allows a throughput of 1,500 tpd of materials. The potential environmental impacts associated with the 1500 tpd throughput have been fully analyzed by the negative declaration that was prepared in support of the CUP approval.

To thoroughly analyze important impacts from the Project, this EIR assesses impacts using two baselines. For each environmental impact topic (such as air quality or noise), the discussion of the environmental setting discusses Project impacts in terms of:

- Conditions related to processing 400 tpd of C&D as now occurs on the site. This baseline is referred to as the 400-tpd baseline throughout this EIR.
- The other baseline is referred to as the 1,500-tpd baseline. This baseline characterizes development in accordance with the Project's existing CUP and the Mitigated Negative Declaration (MND) approved to allow for this throughput in 1999.

The discussion of environmental impacts identifies impacts and mitigation measures associated with measuring the Project against both baselines.

Other key aspects of this EIR include the following:

- Per Section 15360 of the *Guidelines,* this EIR focuses on significant environmental impacts. This section defines "environment" as:

  > *The **physical conditions** (emphasis added) which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.*

- In this EIR, the lead agency and its consultants have made their best efforts to predict and evaluate the reasonable, foreseeable, direct, indirect, and cumulative impacts of the Project. However, CEQA cautions against the use of speculation about impacts that are not reasonably foreseeable.
- The identification of impacts as "significant" or "less than significant" is one of the most important determinations made in CEQA documents. Decisions regarding the significance of impacts are made using significance thresholds (specific standards or criteria) used to determine whether or not an impact is significant. In preparing this document, the lead agency has based its conclusions regarding significance on identifiable thresholds (the *Draft LA CEQA Thresholds Guide* [City of Los Angeles, 2006]) and has supported these conclusions with substantial evidence.
- In accordance with the *Guidelines*, where evidence and opinions of experts differ and the lead agency is aware of these differences, the EIR is required to identify these controversies and summarize the conflicting opinions, and include sufficient information to allow the public and decision makers to take intelligent account of the environmental consequences of their actions. Please note that in rendering a decision where there is disagreement between experts, decision makers are not obligated to select the most environmentally protective viewpoint. They may give more weight to the views of one expert than those of another.

SECTION 2

Project Description

2.1 Project Overview and Background

The Athens Sun Valley Material Recovery Facility (ASVMRF) is an existing facility that processes up to 400 tpd of Construction, Demolition, and Inert materials (C&D) located at 11121 Pendleton Street in the Sun Valley area of the San Fernando Valley in the City of Los Angeles. Mixed loads of C&D materials are sorted at the facility and transferred to offsite destinations. The facility operates under a Conditional Use Permit (CUP) ZA 98-0247 issued by the City of Los Angeles in January 1999; the CUP authorizes the land use for the "establishment, use and maintenance of a recycling materials process and sorting facility (Recycling Center) for mixed waste, in the M2-1G Zone" and establishes general limits on the operation of the facility such as tonnage and hours of operation. The facility also receives and handles up to 15 tons per day (tpd) of municipal solid waste (MSW) and required notifications have been made by the operator to the Local Enforcement Agency (LEA) to allow this type of operation.

Athens now proposes to obtain the appropriate Solid Waste Facility Permit ((SWFP) and undertake a variety of physical and operational changes as described in this section of the EIR. The main components of the Project are:

1. Issuance of a SWFP to accept up to 1,000 tpd of MSW and 500 tpd of C&D materials
2. To construct a MRF/Transfer Station (TS) building, in which MSW would be recycled and transferred; and to construct a building in which to process and recover C&D materials

2.2 History and Background of the Project

In January 1999, following the preparation and approval of an Initial Study and Mitigated Negative Declaration (MND) (State Clearinghouse [SCH] No. 2005011080**,** adopted by the City of Los Angeles in January 1999), the City issued CUP ZA 98-0427 for the facility, authorizing the outdoor receipt and processing of 1,500 tpd of waste materials. This permit authorized "establishment, use and maintenance of a Recycling Materials Process and Sorting Facility (Recycling Center) for mixed waste, construction and demolition waste for the purpose of depositing, sorting, processing and transfer of sorted waste, in the M2-1G Zone."

At the time the CUP was issued, a SWFP from the Local Enforcement Agency (LEA) and California Integrated Waste Management Board (CIWMB) was not required for C&D processing facilities. The facility has operated continuously since January 1999 pursuant to the CUP.

In August 2003, CIWMB regulations for permitting of C&D facilities became effective. These regulations allowed existing facilities to obtain a "temporary registration permit" to enable

continuing construction and operations as facilities went through the new permitting process. The previous owners of the site chose not to utilize the temporary permit but chose to apply for a SWFP to operate a large-volume facility under the new regulations. Various application packages were submitted to the LEA, however, none of the versions were complete enough for the LEA to process the permit to completion.

In March 2004, the City EA issued Cease and Desist Order No. 04-01, which found that the operator had been accepting MSW without a SWFP and ordered the facility to stop accepting MSW until a SWFP was obtained. The operator complied with that order and submitted all necessary information and documents to complete the SWFP in June 2004.

In July 2004, the City Attorney instituted civil litigation against this facility and several other in the general vicinity. This litigation alleged that the previous operator engaged in unfair business practices through environmental and permitting violations. This litigation was resolved by a Stipulated Judgment filed on July 29, 2004, which includes a discussion of constructing fully covered buildings that have misting systems and negative air pressure as proposed by the applicant.

Between December 2004 and February 2005, the LEA circulated a MND (SCH 2005011080) for the facility to accept 1,500 tpd of C&D materials and MSW. The provisions of the Stipulated Judgment were subsequently incorporated into the permit application and submitted to the LEA in June 2005. After reviewing the permit application, the CIWMB informed the LEA that the CEQA document (MND) did not adequately describe the planned activity. Between June 2005 and November 29, 2005, the LEA worked with the previous owner to improve the application to incorporate the Stipulated Judgment. The LEA accepted the application as complete on November 29, 2005.

On March 30, 2006, the LEA approved the MND for the purpose of moving the SWFP permit forward for concurrence by CIWMB. Subsequently, a labor union appealed the approval of the MND to the EA Independent Hearing Panel under Public Resources Code (PRC) Section 44310. During April and May 2006, the LEA received numerous letters from private individuals, organizations and attorneys asserting that a public hearing was required and that an EIR, rather than an MND, was warranted to assess the environmental impacts of the Project.

On May 12, 2006, after several discussions with the LEA, the operator requested that the permit be returned to the LEA for additional consideration and review. The operator requested a time extension through June 13, 2006.

Between May and August 2006, the LEA met and held conference calls on several occasions with the facility operator to discuss the appropriate type of environmental documentation for the Project. On October 6, 2006, the City issued a Cease and Desist Order to stop operations on the site. On October 19 and 20 of that year, the operator filed two appeals to the Cease and Desist Order. Upon receipt of the request to convene the Independent Hearing Panel, the Cease and Desist Order is stayed until a final determination on its validity is made by the Independent Hearing Panel.

On November 30, 2006, the previous facility operator (American Waste Industries [AWI]) sold the facility to Athens Services. The Independent Hearing Panel met to discuss the Project and the Cease and Desist Order in December 2006 and January 2007. In January

2007, the panel approved a schedule to prepare this EIR to comply with the requirements of CEQA, prior to consideration of appropriate permits.

On July 16, 2008, the City of Los Angeles, Environmental Affairs Department issued a Temporary Solid Waste Facilities Permit pursuant to Title 14, Section 18218.7 of the California Code of Regulations (CCR). This permit, granted in accordance with legislation that became effective January 1, 2008, authorizes the continuation of existing C&D processing operations at the project, with a throughput up to 400 tpd, until June 10, 2010. .

2.3 Project Objectives

The Project is proposed to meet the following objectives:

- To bring the existing facility into compliance with CIWMB regulations, in particular California Code of Regulations (CCR) Title 14 Sections 17380-86, by obtaining a permanent SWFP for the facility.
- To obtain the appropriate permits and authorization to construct certain facilities as discussed in January 29, 2004, Stipulated Judgment between the City Attorney and the previous property owner.
- To receive and process a wider mix of materials at the facility, including commingled MSW in addition to the C&D materials currently received.
- To provide additional capacity to divert MSW and C&D waste from landfills to meet AB 939 diversion requirements and the City goal of 70 percent solid waste diversion.
- To incorporate environmental control and mitigation measures into the design of the Project to reduce any significant environmental impact of the Project.

2.4 Project Location

The ASVMRF is located on a 4.9-acre site at 11121 Pendleton Street, Sun Valley, California, 91353. Sun Valley is located in the northeast portion of the San Fernando Valley within the City of Los Angeles. The legal description for the site is: Lot 12 of Block 19 of Los Angeles Land and Water Company's subdivision of a part of the Maclay Rancho, as per book 3, pages 17 and 18 of maps, in the Office of the Los Angeles County Recorder, and bearing the coordinates Latitude 34.23809 and Longitude -118.373. **Figure 2-1** shows the regional location and the surrounding vicinity of the Project site.

The site is located in a primarily industrial area of Sun Valley. Surrounding properties are developed with single- and two-story commercial buildings, industrial buildings, automobile dismantlers, salvage yards, a solid waste transfer and recycling facility, a large truck parking facility, a solid waste landfill, and a landfill that accepts inert materials. Land uses in the vicinity of the Project site are shown in **Figure 2-2**. The parcel adjacent to the site on the northeast is vacant but permitted for quarrying. Major freeways in the site vicinity are Interstates 5 (I-5) and 210 (I-210) with local access to the site via Sunland Boulevard and Glenoaks Boulevard.

2.5 Description of Existing Operations/Facility

The existing CUP (ZA 98-0427) for AWI, approved by the City of Los Angeles on January 25, 1999, authorizes "establishment and maintenance of a Recycling Materials Process and Sorting Facility (Recycling Center) for mixed waste, construction and demolition waste (C&D) for purpose of depositing, sorting, processing and transfer of sorted waste, in the M2-IG Zone." The CUP prohibits the acceptance of household hazardous waste, liquid, gaseous waste, and other toxic or hazardous waste. That the existing permit allows for the acceptance of municipal solid waste (MSW) was confirmed in a June 7, 2000 letter from R. Nicolas Brown (Associate Zoning Administrator) to the previous facility owner which states that "[i]t is anticipated that your operation will receive, sort for the purpose of recycling and transport all other materials that are in the waste stream unless deemed inappropriate by the Department of Building and Safety, Bureau of Sanitation (as LEA at the time) or Fire Department." Additionally, on August 18, 2005, the facility obtained a permit to operate as a limited volume solid waste facility.

The existing facility is one of several local recycling facilities that process mixed loads of C&D materials. These are loads of recyclable materials from construction and demolition sites (such as wood, metal, and concrete) that may be mixed with other nonrecoverable materials. The loads are trucked to the Project site in roll-off trucks and debris boxes from the construction and demolition sites.

After incoming loads are received at the scale house, they are unloaded in a tipping area where an operator uses an excavator equipped with a grapple to push materials onto an infeed conveyor and separates out large pieces of wood and metal. Materials on the conveyor are routed through a trommel screen that separates materials by size. The larger materials are routed to an elevated sorting platform where wood and other recoverable materials are removed. Recovered wood is chipped and ground into wood fines with a tub grinder. Recovered material is stored in several concrete bunkers located on the north side of the site.

All operations currently occur outdoors, consistent with the existing CUP. Contact water[1] runoff from the site is collected in a 300-gallon catch basin located at the lowest point on the site. From the catch basin, two sump pumps transfer the stormwater to a 1,500-gallon clarifier (an oil, water and sediment separator). From the clarifier, it is discharged to the City sanitary sewer, as permitted by the existing Industrial Waste Discharge Permit issued by the City of Los Angeles. The clarifier is equipped with a device that regulates the sump pumps to ensure they cease operations 30 minutes after a storm starts and do not start again for at least 12 hours.

The facility operates from 7 a.m. to 8 p.m. daily, in accordance with the CUP.

[1] "Contact water" refers to rain and any process water that has contacted the materials being processed at the site.

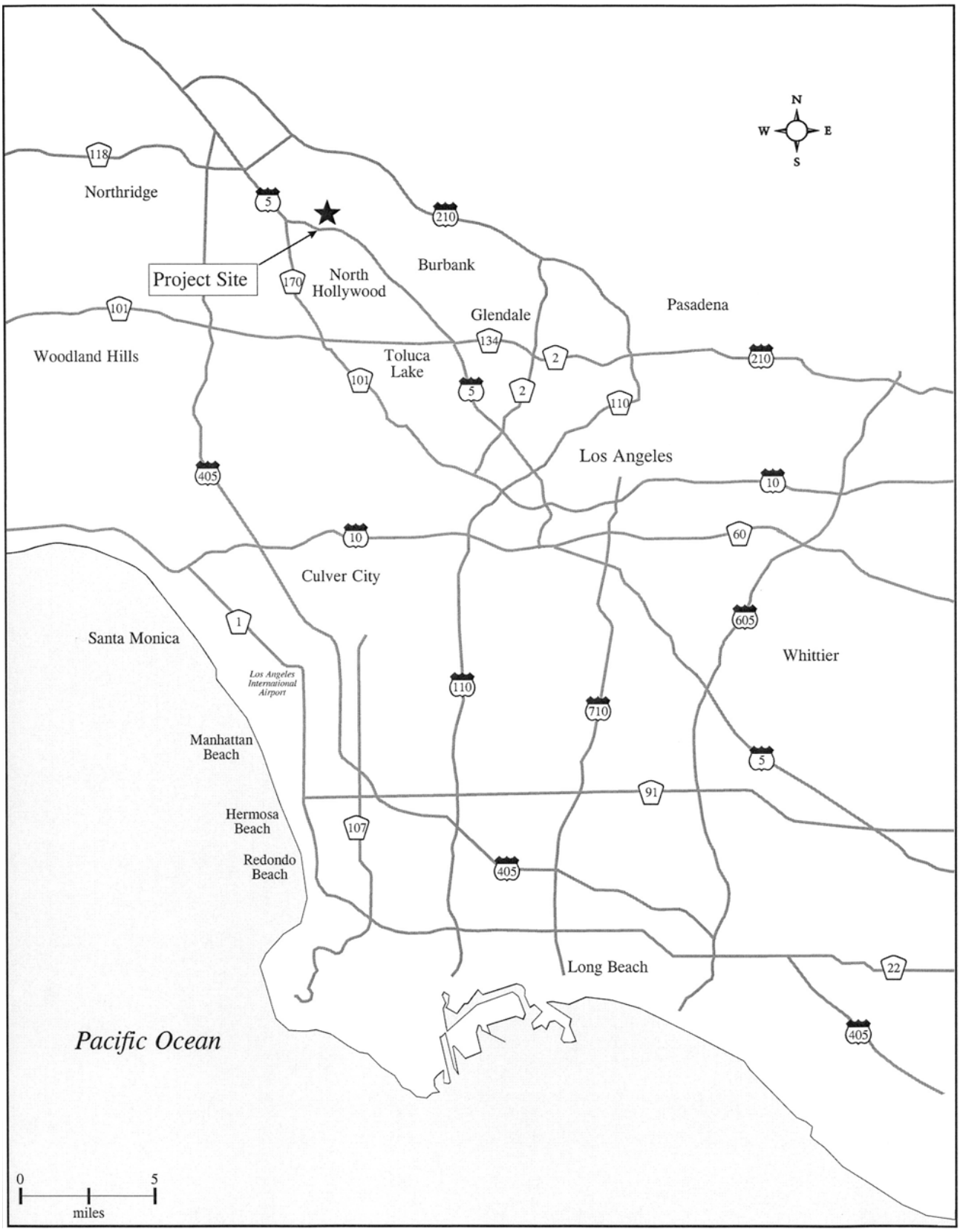

FIGURE 2-1
Regional Location Map
Athens Sun Valley MRF

Source: Christopher A. Joseph & Associates

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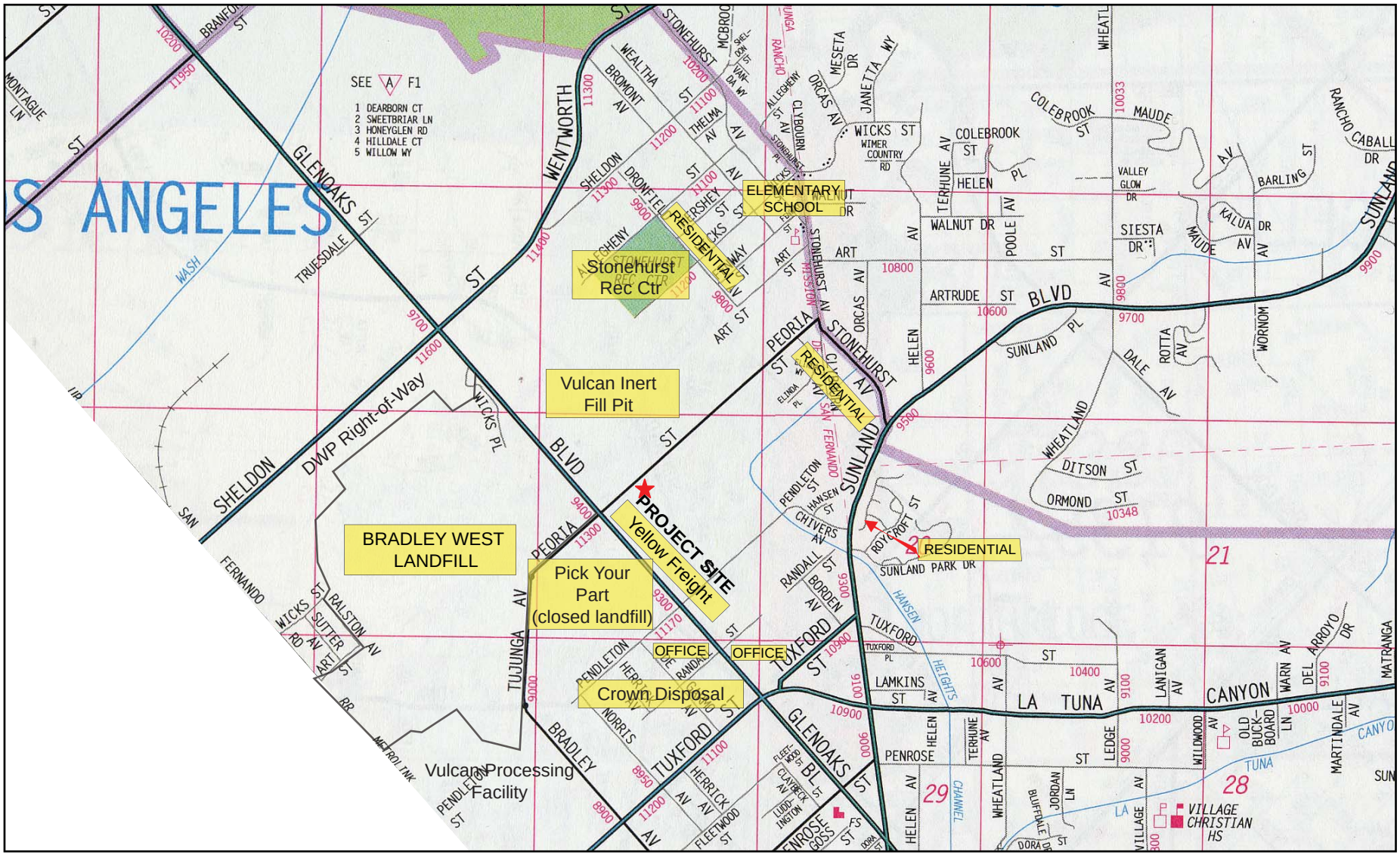

FIGURE 2-2
Vicinity Map
Athens-Sun Valley Waste MRF

Source: Thomas Guide, Los Angeles and Orange Counties, 2003.

ES032007003SCO355351.01.01 vicinity map.ai 9/07

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2.6 Proposed Project

2.6.1 Introduction

This section of the Draft EIR describes the proposed project to process 1,500 tpd, of which 1,000 tpd will be MSW and 500 tpd of C&D materials. The project is also described graphically in the following drawings:

- **Figure 2-3**, the Site Plan, shows the proposed configuration of buildings and equipment on the project site. Site access is also shown on this figure.
- **Figure 2-4** is a perspective depiction of the project looking from southeast to northwest.
- **Figure 2-5**, the Process Flow Diagram, shows the estimated general tonnage of materials received recycled and disposed.

2.6.1.1 Construction of Site Structures

Athens proposes to construct an MRF/TS building and a C&D processing building at the site to contain activities associated with processing the waste, recyclables, and C&D materials. **Table 2-1** shows the size of structures and other proposed uses of the Project site.

TABLE 2-1
Proposed Site Structures and Uses

Structure or Function	Size (ft^2)
MRF/TS	44,200
C&D Processing Building	18,045
Wood Storage	7,200
Bale Storage	7,200
Maintenance Building	2,100
Truck Wash	864
Office	643
Building Total	**80,252**
Landscape	5,026
Hardscape	139,457
Total Area	**224,735**

ft^2 – square feet

As discussed in the Stipulated Judgment between the previous owner and the City Attorney, Athens proposes to house C&D recovery operations in a building that is enclosed on four sides (with a 40-foot-wide rollup door). The C&D building would be equipped with automatic and manual misting systems and negative air pressure to control dust and odor within the building. The two existing tub grinders, which currently operate outdoors, would be moved inside under the proposed plan. The MRF/Transfer Station building would also be enclosed on four sides with misting and negative air pressure systems.

The MRF/TS building will be enclosed on four sides and equipped with automatic and manual misting systems and negative air pressure to control dust and odor at the site. The misting systems would be equipped with a neutralizing enzyme to further mask odors. The proposed equipment layout in the building is shown in **Figure 2-3**.

Access to the site would continue to be via the existing entrance on Pendleton Street. Incoming loads would be checked in at the existing scale house and directed to either the C&D processing building or the MRF/TS building, as shown in **Figure 2-4**.

As part of the Project, a solar-powered energy system capable of generating a minimum of two kilowatts of energy would be utilized to provide power to the Project site.

Hours of Operation

No change of hours of operation is proposed. Under the Project, Athens Sun Valley MRF would continue to operate from 7 a.m. to 8 p.m. daily, in accordance with the existing CUP.

2.6.1.2 Waste Processing Activities

Waste Transfer and Recovery Operations

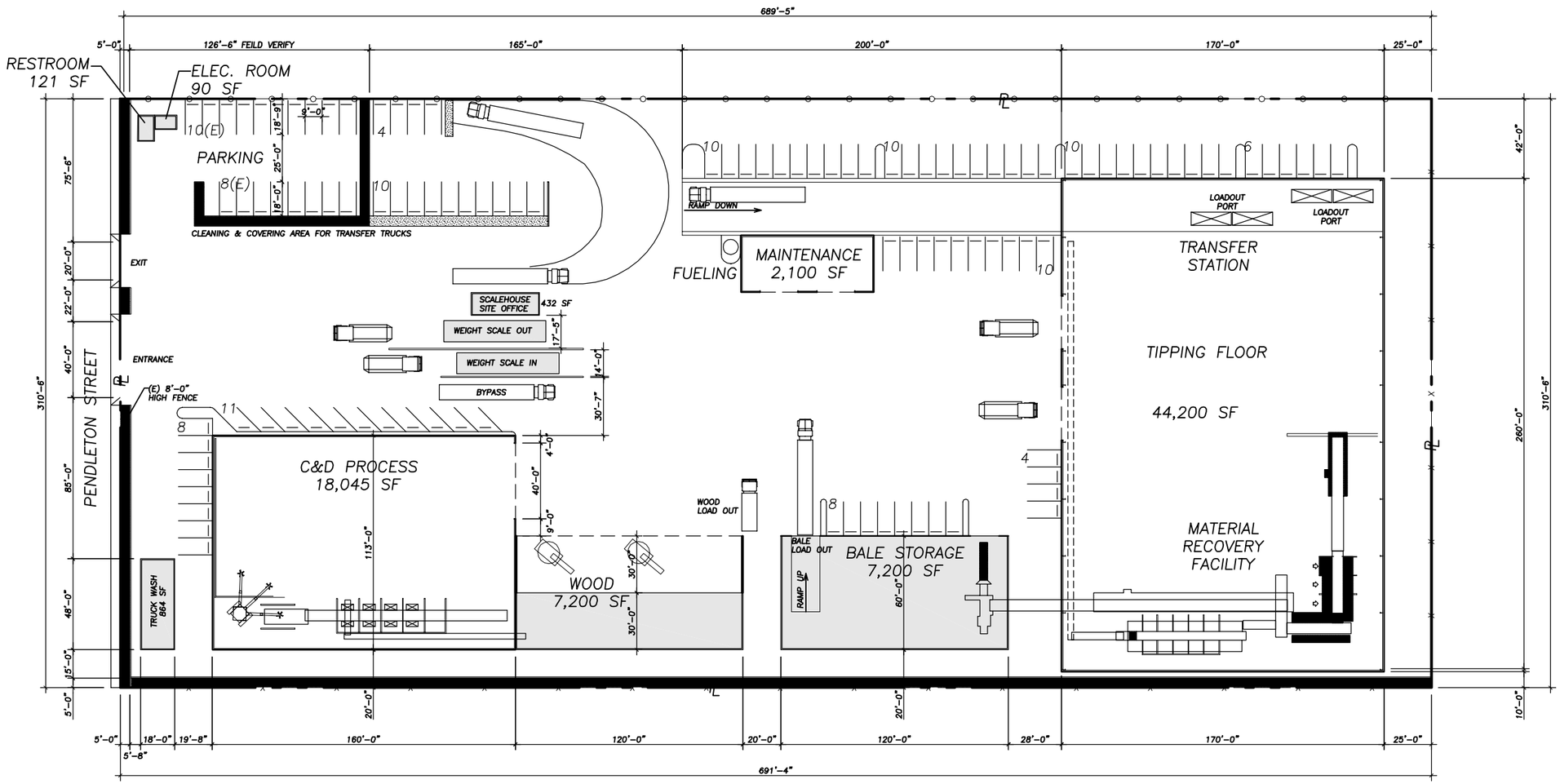
Upon approval of the SWFP, Athens proposes to process 500 tpd of mixed C&D materials and 1,000 tpd of MSW and commingled recyclables. It is anticipated that most waste received at the facility will be generated in the City of Los Angeles. The jurisdiction of origin of all loads will be monitored in accordance with existing disposal reporting requirements and reported to the landfill which receives waste processed at the Project site. This information will be made available upon request to the LEA.

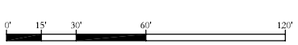
A mass balance diagram showing the waste streams and tonnages to be handled at the Project site is presented in **Figure 2-5**. Athens does not propose to receive or process quantities of green waste. The only green waste that would be handled at the site would be that included as a fraction of the materials in mixed loads of C&D or in mixed loads of solid waste.

Loads of MSW and C&D materials would enter the site from the existing entrance on Pendleton Street. Incoming vehicles would be weighed at the existing scale house as they enter the facility and directed to either the MRF/TS or the C&D processing building, depending on the contents of their load.

Incoming loads to the MRF/TS would be handled as follows:

1. High-grade commercial loads with recyclables would be deposited on the tipping floor near the foot of the in-feed conveyor. Loads would be open and spread, and large recyclables (for example, scrap metal and cardboard) would be removed by floor sorters before the material was placed on the conveyor and further sorted to remove recyclables. Recyclables removed through the sorting process would be stored in the bale storage. Residuals from the sorting process would be routed back to the transfer area for loading into transfer vehicles.
2. Loads that contain residual waste (that is, little or no recyclables) would be deposited on the transfer station tipping floor and pushed to holes on the tipping floor (located on the south side of this building) into top-loading transfer vehicles.





SITE ANALYSIS

SITE TOTAL	214,683 SF	4.93 ACRES
BUILDING	SQ. FT.	PERCENT
ELEC. RM	90	
RESTROOM	121	
SCALEHOUSE	432	
TRUCKWASH	864	
C&D	18,045	
TS/MRF	44,200	
MAINTENANCE	2,100	
WOOD STORAGE	7,200	
BALE STORAGE	7,200	
BUILDING TOTAL	80,252	37%
LANDSCAPE	5,026SF	2%
HARDSCAPE	139,457SF	61%

PARKING ANALYSIS

OFFICE		
ELEC. RM	90SF	
RESTROOM	121SF	
SCALEHOUSE	432SF	
OFFICE TOTAL	643SF	2 SPACES
C&D		
MANUFACTURE	5,500SF	11 SPACES
WAREHOUSE	12,545SF	21 SPACES
TS/MRF		
MANUFACTURE	12,000SF	24 SPACES
WAREHOUSE	32,200SF	24 SPACES
MAINTENANCE	2,100SF	4 SPACES
TRUCK WASH	864SF	2 SPACES
WOOD STORAGE	7,200SF	
BALE STORAGE	7,200SF	
WAREHOUSE TOTAL	14,400SF	21 SPACES
SITE TOTAL REQUIRED		109 SPACES
TOTAL PROVIDED		109 SPACES

FIGURE 2-3
Site Plan - Alternative 1
Athens Sun Valley MRF

Source: Architects Engineers Planners

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FIGURE 2-4
Perspective
Athens-Sun Valley Materials Recovery Facility

Source: J.R. Miller & Associates, 2008.

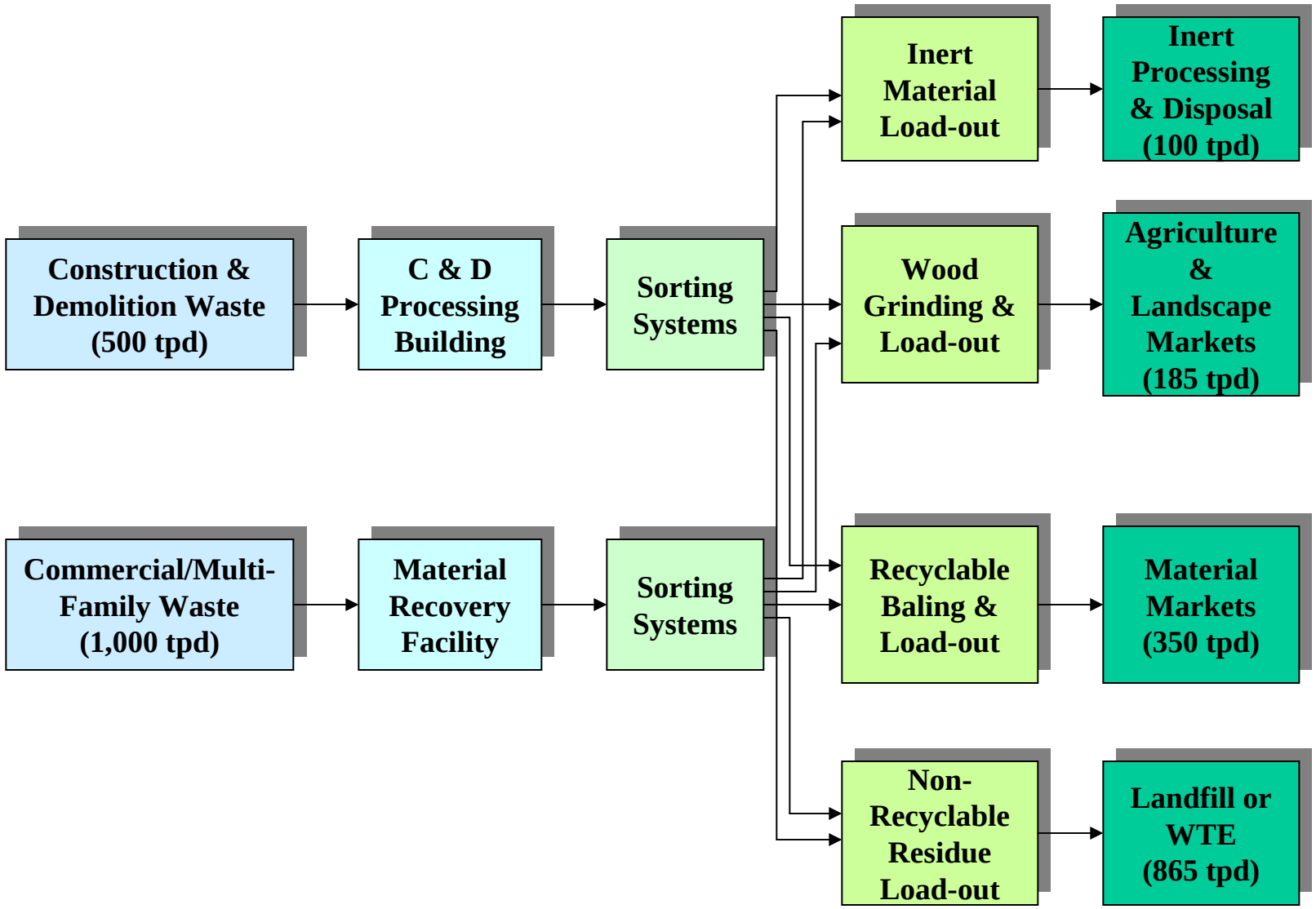


FIGURE 2-5
Process Flow Diagram
Athens-Sun Valley Materials Recovery Facility

Source: Athens Services, 2008.

C&D Recovery Operations

Vehicles/containers with C&D materials would also enter via the Pendleton Street entrance and weigh in using the scale. At the scale house, they will be directed to the C&D processing building area, where they will enter and deposit their loads on the tipping floor. C&D materials will be processed as follows:

1. After loads are deposited on the tipping floor, large items such as appliances, furniture, carpet, metal, and wire will be removed by floor sorters and stored in roll-off containers placed on the west side of the C&D building.

2. Smaller C&D materials will be loaded into the in-feed conveyor and separated by size using a trommel screen. Larger materials will be manually sorted on the elevated sorting platform removing trash, fiber, inert materials, drywall, and metal. Metals will be stored in the bins on the west side of the C&D processing building. Recovered wood will be placed on the wood transfer conveyor where it will be moved to recovered wood pile prior to grinding. Wood will be ground twice within the C&D building and then moved to the storage area shown on the site plan. Drywall and other inert materials will also be stored in the rolloffs until materials accumulate in quantities sufficient for transport to end users. The size and configuration of C&D facility storage areas are shown in **Figure 2-5**.

3. The fine material (mainly dirt) will drop to the floor at the location shown on the site plan. From this area, it will be removed with an excavator to rolloffs. This will be collected and transported either for use as alternative daily cover at a landfill or go to a composting facility.

2.6.1.3 Project Equipment

Table 2-2 shows the mix of equipment currently used for existing operations; the mix necessary to under the 1,500-tpd baseline; and the Project mix of 1,000 tpd of MSW and 500 tpd of C&D materials.

2.6.1.4 Project Traffic

Table 2-3 summarizes existing and estimated future traffic at the site under both baselines (400- and 1,500-tpd) and with the Project (500 tpd of C&D and 1,000 tpd of MSW). In reading this table, please note that incoming trips refers to trips bringing materials to the site, and outgoing trips means trips removing recyclables and residual waste from the site after processing.

TABLE 2-2
Project Equipment Mix

Equipment Type	400-tpd baseline	1,500-tpd Baseline	1,500-tpd Project (1,000 MSW, 500 C&D)
Mobile Equipment			
Loaders	3	4	4
Excavators	3	4	4
Forklifts	1	1	2
Sweeper	1	1	1
C&D Equipment			
Material Feed/ Incline Conveyor	1	1	1
Trommel and Transfer Conveyor	1	1	1
C&D Sorting Conveyor	1	1	1
Tub Grinders	2	2	2
Dirt Screen	1	1	1
MRF Equipment			
Infeed and Infeed Conveyor	0	0	1
Screened Material Infeed and Incline Conveyor	0	0	1
Presort Conveyor	0	0	1
Sorting Conveyors	0	0	2
Baler Infeed conveyor	0	0	1
Baler	0	0	1
Screens	0	0	3
Transfer Conveyors	0	0	4

TABLE 2-3
Daily Project Traffic

Trip Type	400-tpd Baseline	1,500-tpd Baseline	1,500-tpd Project (1,000 MSW, 500 C&D)
Inbound	80	300	200
Outbound	17	65	65
Employee Trips	25	62	65
Total Trips	**122**	**427[a]**	**330**

Note: Inbound trips are trips delivering materials to the site. Outbound trips are trips where materials are loaded at the site and delivered elsewhere (landfill, end-users of recycled materials).

[a]The 427 trips shown is an estimate based on the number and type of vehicles that would use the site under the 1,500-tpd baseline. This estimate is less than the 440 total trips used to estimate traffic impacts in the 1999 MND approved when the facility was issued a CUP.

The 1,500-tpd C&D baseline results in the most trips, mainly because of the small (approximately 5 tons per load) payloads of rolloff vehicles bringing C&D materials to the Project site. Collection vehicles delivering MSW to the Project site have a payload of approximately 10 tons per vehicle; hence there will be fewer trips with the Project (500 tpd C&D and 1,000 tpd MSW) because vehicles carrying MSW have higher payloads.

2.6.1.5 Environmental Controls

With C&D recovery operation and solid waste transfer and MRF operations housed in enclosed buildings with misting and negative air pressure systems with filtered exhaust, particulate emissions would be reduced substantially compared with emissions from existing operations. Similarly, noise and odor emissions would also be reduced by moving operations indoors and using negative air pressure and misting systems in both buildings.

Athens would implement environmental controls in accordance with State Minimum Standards for Operating C&D Facilities and MRF/TS (Title 14, CCR, Division 7, Chapter 3) as part of the Project, including the following measures:

- **Hazardous Materials:** Athens will implement the approved Hazardous Waste Load Checking Program as described in the facility Transfer and Processing Report. Any changes in this program will be approved by the LEA prior to implementation. The load check program will include randomly checking one C&D load per day and one MRF/Transfer load per day. Small quantities of household hazardous waste (HHW) detected in incoming loads will be brought to an onsite HHW storage container, segregated by class, and manifested in accordance with federal and state regulations. Only employees with proper training will handle HHW. A spill response kit will be located in the storage container to include absorbent material, brooms, shovels, 55-gallon drums, protective gloves, clothing, boots, goggles, and respiratory protection equipment.
- **Odor Control:** Odor control will be achieved by implementing MSW processing operations indoors within enclosed buildings with negative air pressure. In addition, odors will be limited by the use of an odor neutralizer as part of the misting system and

removal of any nonsalvageable waste within 48 hours of its receipt on a first-in, first-out basis. These measures will be incorporated into an Odor Management Plan for review and approval by the LEA in accordance with the requirements of South Coast Air Quality Management District (SCAQMD) Rule 410.

- **Dust Control:** Dust control will be achieved through compliance with the provisions of the July 29, 2004 Stipulated Judgment, which discuss indoor processing operations with manual and automatic misting systems. In addition, outdoor C&D operations will be halted during periods of extreme wind conditions. As recommended by the SCAQMD, extreme wind conditions are defined as instantaneous wind speeds that exceed 25 miles per hour. In addition, a mechanical sweeper will be used to clean the tipping floors, outside the buildings, and around the perimeter of the facility on a daily basis.
- **Litter Control:** Moving operations indoors within fully enclosed buildings will help to control litter. In addition, the operator will implement and comply with the Litter Control Program outlined in the facility Transfer and Processing Report. The operator will provide sweeping of the entire transfer station site two times per day. A cleanup crew will be assigned to keep the entrance used for ingress and egress free of litter resulting from facility operation. Additionally, this crew will clean litter from the street and sidewalks 500 feet in either direction of the entrance and exit at least two times per day. All transfer vehicles and trucks utilizing the facility will be required to be covered to prevent material blowing from vehicles.
- **Vector Control:** Due to the organic content of MSW handled with the Project, the Project will be more attractive to vectors than under existing conditions. Moving operations indoors will incrementally reduce the attraction and access of rodents, birds, and insects to refuse at the facility compared with existing operations. In addition, any nonsalvageable waste will be loaded into transfer trailers and removed from the site within 48 hours on a first-in, first-out basis. Athens personnel will inspect the site on a continual basis to check for the presence of vectors. Additionally, Athens will contract with a licensed vector control company to eliminate potential vectors on an as-needed basis.
- **Air Quality Control:** To reduce air emissions, Athens will comply with CARB requirements to retrofit diesel vehicles with particulate traps by the year 2009. Athens will also maintain compliance with the SCAQMD Rule 1193.

2.6.1.6 Sustainability Features

By definition, a facility that recovers recyclables from MSW and reusable materials from the C&D waste stream promotes sustainability. In addition, buildings on the site will be constructed with the following features:

- High-pressure, low-flow water fixtures in the MRF and C&D processing building.
- Variable frequency drives to reduce power consumption in the MRF and C&D processing building.
- High efficiency lighting fixtures in all buildings.

- Maximization of skylights and natural lighting to reduce power consumption in the MRF and C&D processing building.
- Use of automatic light switches in the office building.

2.6.1.7 Regulatory Permits

The primary permit related to the operation of the Project is the SWFP authorizing operation of both the MRF/TS and C&D processing facility. The SWFP is issued by the City of Los Angeles Environmental Affairs Department in its capacity as LEA with the concurrence of the CIWMB.

Implementation of the Project also would require permit modifications or approvals by the following agencies:

- The Los Angeles Regional Water Quality Control Board (responsible agency), which oversees the National Pollutant Discharge Elimination System (NPDES) General Industrial Activities Storm Water Discharge Permit.
- SCAQMD (responsible agency), which would require permits both to construct and operate the new facilities. SCAQMD requirements would include compliance with Rule 410, Odors from Solid Waste Transfer Stations and Material Recovery Facilities.
- City of Los Angeles Department of Public Works, Bureau of Sanitation, Industrial Waste Management Division for an Industrial Waste Discharge Permit
- State Water Resources Control Board (SWRCB) requires the approval of Storm Water Pollution Prevention Plans (SWPPPs) for construction and operation of the Project.

In a scoping meeting held to solicit comments on issues to be addressed in this EIR, a commenter stated that a new CUP may be necessary to allow this facility to accept MSW. A new CUP is not warranted for the following reasons:

- Page 1 of the existing CUP approves "a conditional use permit to permit the establishment, use and maintenance of a Recycling Materials Process and Sorting Facility (Recycling Center) for ***mixed waste*** [emphasis added], construction and demolition waste for the purpose of depositing, sorting, processing and transfer of sorted waste in the M2-IG Zone."
- The facility was operating under a limited volume solid waste facility permit since August of 2005 for that portion of the facility that handled municipal solid waste.
- This specific issue of whether the CUP allows for the processing and recycling of "municipal solid waste" was raised and resolved by the previous owners and the City several years ago.
  - In response to a request from the previous owner for clarification of this issue in a letter dated March 6, 2000, Associate Zoning Administrator R. Nicolas Brown indicated that the planned implementation of the "material recovery facility for municipal solid waste and transfer station" is not precluded by Condition 5 in the CUP, which prohibits the operation from accepting HHW, liquid and gaseous waste, radioactive waste, and other toxic or hazardous wastes.

- The letter further indicated that "[i]t is anticipated that your operation will receive, sort for the purpose of recycling, and transport ***all other materials that are in the waste stream***, unless deemed inappropriate by the Department of Building and Safety, Bureau of Sanitation (as the LEA), or Fire Department" (emphasis added).
- Thus, because municipal solid waste is not precluded by Condition No. 5, because it is an incidental and unavoidable contaminant "in the waste stream," of all recycling facilities and because the granting clause of the CUP specifically contemplates that the facility will handle "mixed waste," and because it has not been deemed inappropriate by the relevant departments, the letter from the Associate Zoning Administrator infers that the handling of MSW is anticipated under the January 1999 CUP.

Thus, a new CUP from the City of Los Angeles is determined not to be needed as part of the current permitting process.

SECTION 3

Environmental Setting, Impacts, and Mitigation Measures

Draft Environmental Impact Report Format

Section 3 of the Draft EIR addresses the following types of potential impacts of the proposed Project construction and operation on various resource areas:

- Aesthetic/Visual (including light and glare)
- Air Quality
- Noise
- Population and Housing
- Surface Runoff
- Traffic and Circulation

This section also discusses why other potential impacts are not considered significant.

To assist the reader in comparing information about the environmental issues discussed in this section, each impact assessment topic is structured as follows:

- Introduction
- Regulatory Setting
- Environmental Setting
- Impacts and Mitigation Measures
  - Methodology
  - Thresholds of Significance
  - Project Impacts and Mitigation Measures
  - Cumulative Impacts

To determine the significance of impacts, EIRs measure the difference between existing conditions and potential impacts of the Project. For this Project, the baseline is not necessarily current conditions because the facility was previously entitled to operate (in 1999) and was operating under proper local permits, pursuant to the approval of a Mitigated Negative Declaration (MND), when the new LEA/CIWMB requirements for a SWFP was created in 2003. As mentioned in the Introduction (Section 1), this EIR will utilize two different baselines to assess potential impacts. In structuring this document, there are two ways to view baseline conditions: (1) in terms of existing conditions and operating procedures at the site and (2) in terms of the level and type of development (1500 tpd) assessed in the previously approved environmental document.

To be comprehensive, this EIR uses both baselines to assess the significance of these impacts. This section of the EIR refers to the first baseline as physical conditions related to processing 400 tpd of C&D materials. The second baseline describes conditions related to

processing 1,500 tpd waste materials. Both baselines assume that all tonnage received is C&D materials, consistent with the current design and operation of the facility. A small percentage of municipal solid wastes are incorporated into the analysis as an unavoidable contaminant of the recycling process and provided for in the existing 15 ton per day limited volume transfer station permit obtained by the previous owner on October 18, 2005.

Terminology

The significance of an impact is determined using the thresholds of significance for each impact assessment topic as presented in the *LA CEQA Thresholds Guide* (City of Los Angeles, 2006) and specific thresholds used by applicable resource agencies, such as the SCAQMD. Impacts are then categorized with one of the following designations:

- There is no impact when no adverse changes in the environment are likely to occur.
- A less than significant impact would cause no substantial adverse change in the environment.
- A significant (but mitigable) impact would have a substantial adverse impact on the environment, but could be reduced to a less than significant level with mitigation.
- A significant unavoidable impact would cause a substantial adverse effect on the environment that cannot be reduced to a less than significant level through the implementation of feasible mitigation measures.
- Residual impacts describe the impact remaining after mitigation measures are applied.

Assessment of Cumulative Impacts

Section 15130 of the CEQA *Guidelines* requires that EIRs include a reasonable analysis of the cumulative impacts of proposed projects. Section 15355 of the *Guidelines* defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." This section further states that cumulative effects may be changes resulting from a single project or a number of separate projects and that the cumulative impacts are those which may result from "closely related, past, present and reasonably foreseeable probable future projects" (*Guidelines*, Section 15355[b]).

Section 15130(b)(1) allows for the use of the following methods to assess cumulative impacts:

- A list of past, present, and probable future projects near the Project site
- A summary of projects in an adopted general plan, related planning document, or environmental document that has been adopted or certified, which describe or evaluate regional or areawide conditions related to the cumulative impact

To be comprehensive, this EIR uses both methods. For some impacts, the use of the general plan and forecasts related to the general plan is a better way of assessing some impacts such as aesthetics and surface drainage. In these cases, the assessment of whether a cumulative

impact is significant is a function of what the Plan assumed about development at the site and how this assumption compares to the Project. Other sections (such as traffic, air quality, and noise) use a list of related projects provided by the City of Los Angeles Planning Department to assess cumulative impacts to insure that the cumulative impact assessment portrays a relatively "worst-case "assessment of the effect of the Project in conjunction with other proposed, planned and recently approved projects.

Projects Considered in Cumulative Impact Analysis

The City of Los Angeles Department of Transportation has identified 6 approved or proposed projects near the Project site. These projects are described in **Table 3-1** with their locations shown in **Figure 3-1**.

TABLE 3-1
Related and Cumulative Projects

Number on Figure 3-1	Project Name and Address	Description
1	Pendleton Street Open Air Market/11051 Pendleton Street	285,705-square-foot commercial development
2	Sun Valley Care Ministries/9000 Sunland Blvd.	Summer Camp, College, Retail
3	Sunland Commercial/8652 Sunland Blvd	17,000-square-foot commercial retail
4	LAUSD Byrd High School/9171 Telefair Ave.	High School, 1,620 students
5	Community Recycling/De Garmo and Pendleton Street	MRF/TS project will add 800 tpd C&D, 800 tpd MSW, 200 tpd food waste, and 50 tpd wood waste processing
6	Bradley Landfill Recycling Center/9227 Tujunga Avenue	Addition of 1,240 tpd green waste processing and construction of a , 5,000 tpd MRF/Transfer Station.

These projects were identified based on their potential impacts on the major arterials utilized by Project-related traffic.

FIGURE 3-1
Related Project Locations
Athens Sun Valley MRF

Source: Meyer, Mohaddes Associates

3.1 Visual Resources

3.1.1 Introduction

Visual or aesthetic resources are generally defined as the natural and built features of the landscape that can be seen. The combination of landform, water, and vegetation patterns represent the natural landscape features that define the visual character of an area while built features such as buildings, roads, and other structures reflect human or cultural modifications to the landscape. These natural and built landscape features or visual resources contribute to the public's experience and appreciation of the environment. Visual resource or aesthetic impacts are generally defined in terms of a Project's physical characteristics and potential visibility, and the extent to which the Project's presence would change the perceived visual character and quality of the environment in which it would be located.

The following discussion describes the visual resources in the vicinity of the existing ASVMRF and assesses potential visual resources impacts as a result of the Project. The analysis is based on anticipated changes at the Project site as a result of the Project, field reconnaissance in the vicinity of the solid waste facility, and review of site photographs. It is important to note that the existing ASVMRF is part of the baseline visual condition in the Project area.

3.1.2 Regulatory Setting

This discussion of the regulatory setting applies to both baseline conditions: (1) baseline conditions as they currently exist at the site (400 tpd) and (2) baseline conditions associated with the facility's existing entitlements (1,500 tpd)

3.1.2.1 Sun Valley–La Tuna Canyon Community Plan

The Project site is located in the Sun Valley–La Tuna Canyon Community Plan (SVLTCCP) area of the City of Los Angeles General Plan. The SLVTCCP includes a variety of information about the community, as well as land use policies and programs and urban design applicable to the Project.

Roughly 18 percent of the acreage in the SVLTCCP area is designated for industrial uses. Aesthetics-related land use policies and programs for the industrial areas in the SVLTCCP that are applicable to the Project are provided below:

- **Policy 3.1-2:** Requires that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses in accordance with design standards.

The SVLTCCP includes a number of design features, intended to "ensure that residential, commercial, and industrial projects and public spaces and rights-of-way incorporate specific elements of good design." For industrial areas, the "emphasis is on screening and the visual compatibility with adjacent land uses." A list of the specific design policies for industrial areas is as follows:

- **Structures**
  - Designing the site and building(s) to convey visual interest and to be compatible with adjacent uses.
  - Treating large expanses of blank walls and tilt-up concrete walls visible from the public right-of-way with contrasting complementary colors, building plane variation, murals, planters, and/or other landscape elements to create visual interest.
  - Screening of mechanical and electrical equipment from public view.
  - Screening of all rooftop equipment and building appurtenances from public view, unless incorporated as part of the project.
  - Requiring the enclosure of designated trash areas for all projects.
- **Lighting**
  - Directing exterior lighting onto the Project site and locating flood lighting so as not to impact any surrounding residential uses.

The SVLTCCP also designates scenic highways to protect and enhance scenic resources. Designated scenic highways in the Plan area include Stonehurst Avenue, La Tuna Canyon Road, Wentworth Street, and the Foothill Freeway.

3.1.2.2 Gabriel/Verdugo Mountains Scenic Preservation Specific Plan

The Project site is also located within the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (Specific Plan) area of the City of Los Angeles General Plan. The Specific Plan is intended to "preserve, protect, and enhance the unique natural and cultural resources of the Plan area." The Specific Plan regulates four general areas: (1) Prominent Ridgeline Protection, (2) Biological Resource Protection, (3) Scenic Highway Corridors Viewshed Protection, and (4) Equinekeeping District Standards, Equestrian Trails, and Domestic Livestock.

The Project site would not impact any prominent ridgelines, and does not contain any biological resources or equine-related resources. Scenic highways identified in the Specific Plan include portions of Big Tujunga Canyon Road, Foothill Boulevard, Foothill Freeway, La Tuna Canyon Road, Sunland Boulevard, and Wentworth Streets. Sunland Boulevard and La Tuna Canyon Road, located 0.3 mile to the east and south, respectively, are within the Project vicinity, but the Project site is neither visible from these roadways nor within the scenic highway corridor (defined as the area extending 500 feet on either side of the centerline of the roadway).

3.1.3 Environmental Setting

This environmental setting section applies to both baseline conditions described in the EIR.

3.1.3.1 Regional Setting

This discussion of the regional setting applies to both baseline conditions: (1) baseline conditions as they currently exist at the site, and (2) baseline conditions associated with the facility's existing entitlements (1,500 tpd).

The Project site is located in the East San Fernando Valley in the City of Los Angeles. As shown in **Figure 3.1-1**, the I-210 Freeway is located approximately 2 miles to the north of the site; the I-5 Freeway is located approximately 1 mile to the south of the site.

Stonehurst Recreational Center, with a playground, baseball diamond, basketball courts, and open space is located approximately 0.5 mile to the north of the site. Stonehurst Elementary School is also located approximately 0.5 mile north of the site, at the corner of Art Street and Stonehurst Avenue. Due to the generally flat terrain in the Project area and intervening development and vegetation in the Project area, the Project site is not visible from either the recreational center or the elementary school.

The nearest residential uses to the Project site are located approximately 0.2 mile to the east, at Randall Street and 0.3 mile to the northeast, in the vicinity of Peoria Street and Elinda Place. Additional nearby residential users are located along Sunland Boulevard. Direct lines of sight from these residential uses are obstructed by a combination of intervening industrial uses, topography, and vegetation. Residential uses to the northeast of the Project site at an appreciable elevation may have private views of the Project site, but are at a sufficient enough distance that it is unlikely the Project site is discernable from surrounding industrial uses.

3.1.3.2 Project Site and Vicinity

As shown in **Figure 3.1-2**, site activity is visible from Pendleton Street via the site entrance. Existing operations at the site consist of processing mixed loads of C&D materials. After incoming loads are received at the scale house, they are unloaded in a tipping area where an excavator pushes materials onto a conveyor while separating large pieces of wood and metal. Materials on the conveyor are sorted by size. Larger materials are routed to a sorting platform where wood and other recoverable materials are removed. Recovered wood is chipped and ground into wood fines with a tub grinder. Recovered material is stored in several concrete bunkers located on the north side of the site. In compliance with the site's CUP, all operations currently occur outdoors.

Security lighting set to turn on at dusk is provided by directional pole lights located throughout the site with lighting focused downward, as shown in **Figure 3.1-2**. Operational lighting is limited to task lights used by maintenance crews when needed, and turned off when not in use.

The site is fronted by an 8-foot-high concrete block wall with a 5-foot-deep planting area that is filled with lush, mature vegetation, as shown in Photo A of **Figure 3.1-3**. Photo B of **Figure 3.1-3** shows mature landscaping that acts as screening along the northeastern side of the Project site. Three buildings and an 8-foot-high concrete block wall screen to the southwest side.

As shown in **Figure 3.1-4** and **Figure 3.1-5**, the Project site is surrounded by industrial uses, including mixed manufacturing and recycling facilities. Photos A and B of **Figure 3.1-4** show the industrial uses in the immediate vicinity of the Project site, while Photos A and B of **Figure 3.1-5** show industrial uses to the west and south of the site, respectively. A comparison of Photo A of **Figure 3.1-3** with **Figures 3.1-4 and 3.1-5** shows that the project site exhibits a considerably greater level of external landscaping and site screening than other industrial uses in the vicinity of the Project site.

In terms of the 1,500-tpd outdoor facility baseline, views of the Project site would be similar to those in **Figures 3.1-2** and **3.1-3**. Although the arrangement/configuration of uses within the Project site may differ and the view from Pendleton Street may also differ accordingly, views of waste transfer and recovery operations within the Project site would be blocked by the concrete wall on Pendleton Street and the landscaping along the northeastern side of the site.

3.1.4 Impacts and Mitigation Measures

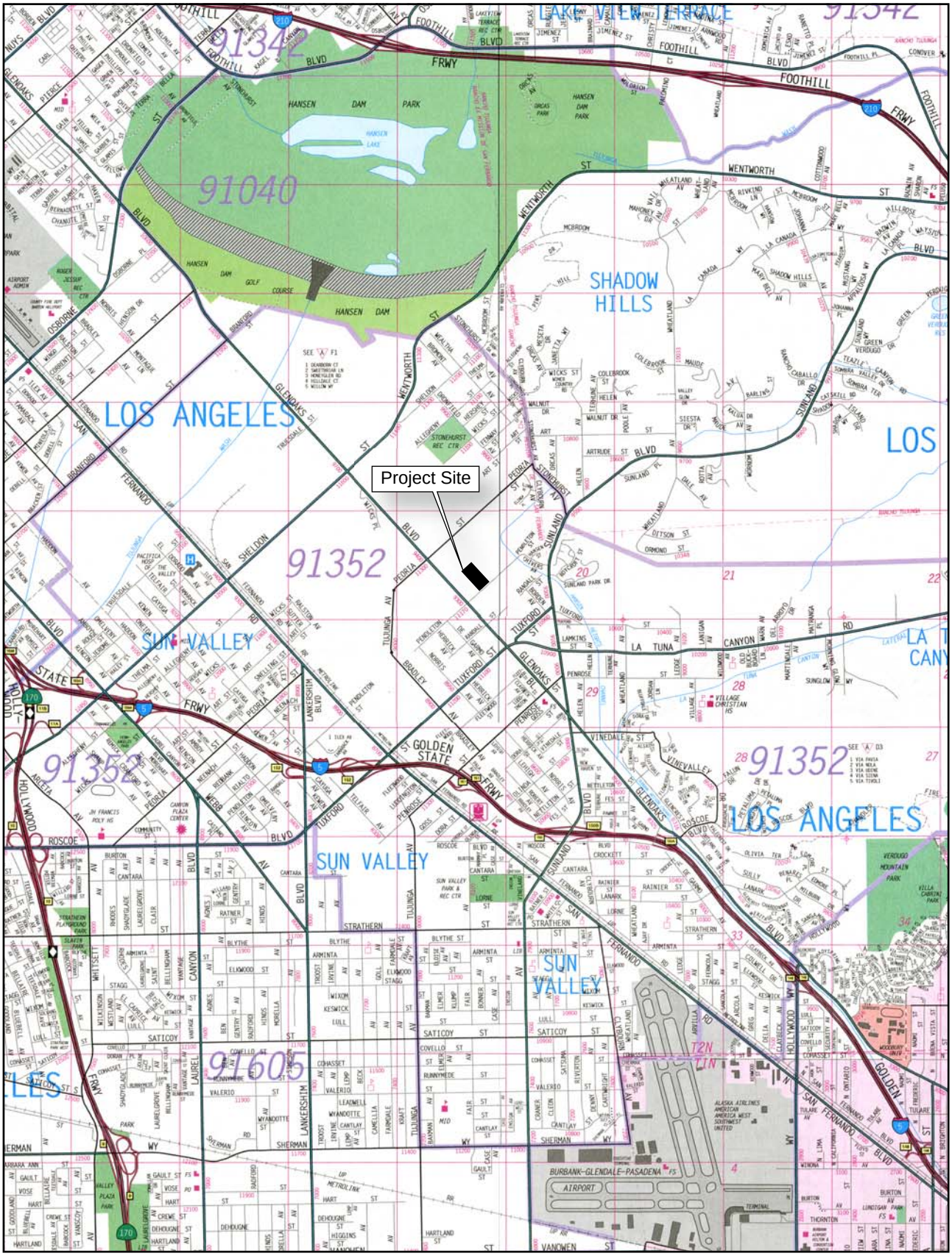
3.1.4.1 Significance Criteria

Analysis of the Project's impacts was based on evaluation of the changes to the existing visual resources that would result from implementation of the Project. In making a determination of the extent and implications of the visual changes, consideration was given to:

- The specific changes in the affected visual environment's composition, character, and any specially valued qualities
- The affected visual environment's context
- The extent to which the affected environment contains places or features that have been designated in plans and policies for protection or special consideration
- The numbers of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the likely changes

Significance criteria for impacts to aesthetic resources were developed from CEQA guidelines and the CEQA Checklist to evaluate the potential environmental impacts to the Project. The following criteria were applied:

- Would the Project have a substantial adverse effect on a scenic vista?
- Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?
- Would the Project otherwise reduce the quality of public views?
- Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?



North

0 0.25 0.5

Approximate scale in miles

FIGURE 3.1-1
Site Location and Regional Setting
Athens Sun Valley MRF

Source: Thomas Guide, Los Angeles and Orange Counties, 2003.

Photo A. View into project site from entrance along Pendleton Street.

Photo B. View into project site from entrance along Pendleton Street .

FIGURE 3.1-2
Existing Site Operation
Athens-Sun Valley MRF

Photo A. Mature landscaping and concrete block wall along Pendleton Street side of project site.

Photo B. Mature landscaping and setback along northeast side of project site.

FIGURE 3.1-3
Landscaping Around Existing Site
Athens Sun Valley MRF

Photo A. Recycling facility on opposite side of Pendleton Street from project site.

Photo B. Industrial uses on the north and south sides of Pendleton Street west of the project site.

FIGURE 3.1-4
Examples of Industrial Uses Surrounding Existing Site
Athens Sun Valley MRF

Photo A. Looking northeast along Pendleton Street from just southwest of Glenoaks Boulevard.

Photo B. Industrial uses on the west side of Sunland Boulevard, between Sunland Boulevard and the project site.

FIGURE 3.1-5
Examples of Industrial Uses Surrounding Project Site
Athens Sun Valley MRF

3.1.4.2 Changes Associated with the Project

For the Project, loads will continue to enter the site via the existing entrance on Pendleton Street and check in at the existing scale house. From the scale house, loads will be directed to either the C&D recovery facility building or the MRF/TS. The C&D recovery facility building will be enclosed on four sides with a roll-up door. The MRF/TS will also be fully enclosed on four sides with a roll-up door. The sides of the buildings where vehicles enter will not be visible at the receptor locations noted in the environmental setting section. Both buildings will include an automatic and manual misting system with negative air pressure to contain dust and odor. The two tub grinders that currently operate outside will be placed inside as part of the proposed project.

Building rooftops are ideal locations for the installation of solar panels to produce energy, which is a part of this project. The installation of solar panels are anticipated, however the visual impact of these panels are not expected to be controversial and are promoted by the City and various utilities for their environmental benefits.

The facility yard and the traffic circulating area will be illuminated with pole lights, similar to the existing condition. All lighting on the property will be directed downward. Perimeter lighting will be installed with shielding and will not reflect toward distant residential properties. No change of hours of operation is proposed as part of the Project.

The following identification of impacts pertains to both baseline conditions.

Impact VIS-1: Construction Impacts (No Impact)

Direct lines of sight from nearby receptor locations (**Figure 3.1-1**) are obstructed by a combination of intervening industrial uses, topography, and vegetation. Residential uses to the northeast of the Project site at an appreciable elevation may have private views of the Project site, but are at a sufficient enough distance that it is unlikely the Project site is discernable from surrounding industrial uses. Accordingly, construction impacts are associated with the Project are considered less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact VIS-2: Scenic Highway Impact (No Impact)

Although the Project site is located in the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan area, the site is not visible from any of the scenic roadways identified in this Specific Plan. Further, the site does not contain any biological resource or area suitable for horses or other resources designated for protection in accordance with this plan.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact VIS-3: Project Impact on Visual Character of Surrounding Area (Less than Significant Impact)

As indicated in the previous discussion of the environmental setting, there is limited visibility of the site under baseline conditions. Views from the north of the site are limited

by mature vegetation that will remain with the Project. Views on the Pendleton Street side of the site are limited, and will be limited in the future, by a concrete block wall and vegetation, although portions of the site are and will be visible from the site entrance on Pendleton Street.

Under both baseline conditions, C&D processing operations are uncovered and occur in the open on the site. With the Project, separate buildings will house C&D processing activities and the transfer and recovery of MSW. By moving most operations indoors and reducing views of interior portions of the site, the Project will result in a beneficial visual change.

Since views of many industrial uses in the vicinity of the Project site are not fully screened by walls and/or mature vegetation, industrial activities are visible from a number of older industrial uses in the area. With the proposed changes associated with the Project (i.e., moving operations indoors), the Project will contribute to increasing visual amenities and hence not degrade visual character of the area.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact VIS-4: Light and Glare Impact (Less than Significant Impact)

Under existing conditions (both baseline conditions) and with the Project, lighting at the Project site will be limited to poles or wall-mounted lighting necessary for security and safety purposes. In accordance with existing regulations, lights are focused downward and not generally visible to surrounding uses. The existing CUP requires that exterior lighting be designed and installed with shielding such that the light source is not visible from nearby residential uses.[1]

The Project will involve the construction of a C&D processing building and a MRF/TS. Both buildings will include security and safety lighting, which will be installed in accordance with the CUP provision noted previously. Also, in accordance with City of Los Angeles building regulations, the proposed buildings will be constructed with nonreflective building materials, hence the Project site will not be a source of glare during daytime hours.

Site lighting would be similar under the Project to the existing condition. Property lighting will be shielded and directed downward. Site operation would end at 8:00 p.m. daily, so night lighting behind this time (with the exception of security lighting) would not be required. The Project would not result in light and glare impacts and no mitigation is required.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

3.1.5 Cumulative Impacts

3.1.5.1 Relationship to Related Projects

As indicated in the impact assessment above, views of the Project site are currently limited by mature vegetation and a concrete block wall. These landscaping features will remain

[1] CUP No. AZ 98-0427 (CUZ). Page 5.

with the Project and potential views will be further limited by moving operations indoors. Accordingly, impacts from construction and operation of the Project will be negligible or less than significant and, as a result, will have little potential to contribute to cumulative impacts related to other projects. As a result, no cumulative impacts related to visual/aesthetic resources are associated with the Project.

3.1.5.2 Relationship to Projections/General Plans

As an industrial use, the Project is consistent with the land use designation for the Project site in the SVLTCCP. This Community Plan was adopted in 1999, the same year that the CUP for the Project site was approved.

The regulatory setting section above cites pertinent provisions from the Sun Valley—La Tuna Canyon Community Plan related to this Project. The Project is consistent with policies in this plan that call for the design of the site to be compatible with adjacent uses, equipment to be screened from public view, and direct exterior lighting and flood lighting be located so as not to impact surrounding uses. The Project does not conflict with any goal or policy of this Community Plan. Since the Project is being developed in a manner that is consistent with the SVLTCCP, no significant cumulative impact to visual/aesthetic resources will result from construction and operation of the Project.

3.1.6 References

City of Los Angeles. 2006. City of Los Angeles Municipal Code Title 9, Article 1, Building Regulations http:amlegal.com. Accessed May 24, 2006.

3.2 Air Quality

3.2.1 Introduction

This section provides an evaluation of the potential air quality impacts associated with operating the ASVMRF.

This section assesses construction and operational emissions for the Project for both baselines described in this document. Construction emissions were developed based on proposed activities and equipment to be used to construct the site structures. Operational emissions for the Project represent the incremental increase in emissions when compared to the two baselines and were based on estimates of vehicle trips and equipment that would be used at the site. As described in the Project Description (Section 2), the Project include reducing visible dust emissions by enclosing the C&D processes indoors with manual and automatic misting system, diverting MSW from landfills, and controlling odors by implementing MSW processing in enclosed buildings equipped with forced air ventilation and filtration in addition to a misting system that uses an odor neutralizer.

3.2.2 Regulatory Setting

Air quality management in California is governed by the federal Clean Air Act (CAA), the California Clean Air Act (CCAA), and the California Health and Safety Code. Several levels of government have adopted specific regulations that limit emissions from stationary and mobile sources. The agencies with the authority to administer regulations relevant to this Project include U.S. Environmental Protection Agency (EPA), the California Air Resources Board (CARB), the CIWMB, and the SCAQMD. The following provides a brief discussion of each agency.

3.2.2.1 U.S. Environmental Protection Agency

EPA is responsible for establishing, implementing, and enforcing federal CAA regulations. California is under the jurisdiction of EPA Region IX, headquartered in San Francisco. Region IX is responsible for the local administration of EPA programs for California, Arizona, Nevada, Hawaii, and certain Pacific trust territories. For most states, including California, EPA has established delegation agreements whereby the states are given primary authority for administering CAA regulatory programs. Consequently, the EPA's activities relative to the California air pollution control program focus on reviewing California's submittals under the CAA state implementation plan (SIP) requirements. The purpose of SIP is to demonstrate how a state will meet or maintain compliance with National Ambient Air Quality Standards (NAAQS).

3.2.2.2 California Air Resources Board

CARB was created in 1968 by the Mulford-Carrell Air Resources Act through the merger of two other state agencies. CARB's primary responsibilities are to develop, adopt, implement, and enforce the state's motor vehicle pollution control program; to administer and coordinate the state's air pollution research program; to adopt and update, as necessary, the state's ambient air quality standards; to review the operations of the local air pollution

control districts; and to review and coordinate preparation of the SIP submittals that go to EPA under the NAAQS program.

3.2.2.3 California Integrated Waste Management Board

CIWMB has a statewide responsibility for overseeing the implementation of the regulatory operating standards for solid waste handling and disposal facilities, which include operational standards for controlling odors, landfill gas migration, and fugitive dust emissions. CIWMB works in partnership with local government, industry, and the public to manage the estimated 76 million tons of waste generated annually in California. CIWMB regulations are implemented and enforced on a local level by designated local enforcement agencies.

3.2.2.4 South Coast Air Quality Management District

When the state's air pollution statutes were reorganized in the mid-1960s, local districts were required to be established in each county. The three different types of districts include county, regional, and unified. The California legislature established special air quality management districts (AQMD) with more comprehensive authority over stationary sources, as well as transportation and other regional planning responsibilities. One of these districts, SCAQMD, is responsible for oversight of air quality regulations in the portion of Los Angeles County that includes the ASVMRF. SCAQMD responsibilities include:

- Developing plans for meeting state and federal ambient air quality standards through Air Quality Management Plans
- Developing control measures for stationary sources of air pollution necessary to achieve and maintain both state and federal air quality standards
- Implementing permit programs for the construction, modification, and operation of stationary sources of air pollution
- Enforcing air pollution statutes and regulations governing stationary sources
- Developing employer-based trip reduction programs

3.2.3 Applicable Regulatory Programs

This section presents the ambient air quality standards, a discussion of air toxics, and identifies the air quality rules and regulations applicable to the Project.

3.2.3.1 Ambient Air Quality Standards

Pursuant to the CAA, EPA established NAAQS for the following air pollutants (termed "criteria" pollutants): carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter defined as particulate matter less than 10 microns in aerodynamic diameter (PM_{10}), fine particulate matter defined as particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$), and lead. In setting the ambient air limits for these pollutants, EPA divided the standards into two types: primary and secondary. Primary standards protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards protect

public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings (EPA, 2007a).

The federal CAA also requires EPA to designate areas (counties or air basins) as attainment or nonattainment with respect to each criteria pollutant, depending on whether the area meets the NAAQS. An area that is designated nonattainment means the area is not meeting the NAAQS and is subject to planning requirements to attain the standard. The plans for nonattainment areas rely on development of more stringent planning, permitting, and pollution control requirements than would be required in SIPs for areas that meet the NAAQS (attainment areas). Many counties in California are currently designated nonattainment for the federal ozone and particulate matter standards, so these pollutants are of greatest concern when evaluating a project's air quality impacts.

CARB oversees California air quality policies and is responsible for preparing and submitting the SIP to the EPA. California established state ambient air quality standards (CAAQS) in 1969. These standards are generally more stringent and include more pollutants than the NAAQS. The California CAA was approved in 1988 and requires each local air district in the state to prepare an air quality plan to achieve compliance with the CAAQS. Similar to the EPA, CARB designates counties in California as attainment or nonattainment with respect to the CAAQS. The CAAQS includes standards for the following pollutants: O_3, NO_2, CO, SO_2, PM_{10} and $PM_{2.5}$, lead, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Both federal and California air quality standards consist of two parts: an allowable concentration of a pollutant, and an averaging time over which the concentration is to be measured. Allowable concentrations are based on the results of studies of the effects of the pollutants on human health, crops, and vegetation, and, in some cases, damage to paint and other materials. The averaging times are based on whether the damage caused by the pollutant is more likely to occur during exposures to a high concentration for a short time (e.g., 1 hour), or to a relatively lower average concentration over a longer period (e.g., 8 hours, 24 hours, or 1 year). For some pollutants, there is more than one air quality standard, reflecting both short-term and long-term effects. **Table 3.2-1** presents the NAAQS, the CAAQS, and the attainment status for each pollutant.

TABLE 3.2-1
Ambient Air Quality Standards

Criteria Pollutant	Federal Standard (Averaging Period)[a]	Federal Attainment Status	State Standard (Averaging Period)[b]	State Attainment Status
Carbon Monoxide (CO)	35 ppm (1 hour)	Attainment[c]	20 ppm (1 hour)	Attainment
	9 ppm (8 hour)	Attainment[c]	9 ppm (8 hour)	Attainment
Nitrogen Dioxide (NO_2)	0.053 ppm (annual arithmetic mean)	Attainment	0.18 ppm (1 hour)[d] 0.03 ppm (annual average)[d]	Attainment
Ozone (O_3)	0.075 ppm (8 hour)	Nonattainment	0.07 ppm (8 hour)	Nonattainment
			0.09 ppm (1 hour)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	15 µg/m^3 (annual arithmetic mean)	Nonattainment	12 µg/m^3 (annual arithmetic mean)	Nonattainment
	35 µg/m^3 (24 hour)[e]	Nonattainment	No separate Standard (24 hour)	

TABLE 3.2-1
Ambient Air Quality Standards

Criteria Pollutant	Federal Standard (Averaging Period)[a]	Federal Attainment Status	State Standard (Averaging Period)[b]	State Attainment Status
Particulate Matter (PM_{10})	Revoked (annual arithmetic mean)[f]	NA	20 µg/m^3 (annual arithmetic mean)	Nonattainment
	150 µg/m^3 (24 hour)	Nonattainment	50 µg/m^3 (24 hour)	Nonattainment
Sulfur Dioxide (SO_2)	0.030 ppm (annual arithmetic mean)	Attainment	--	--
	0.14 ppm (24 hour)	Attainment	0.04 ppm (24 hour)	Attainment
	--	--	0.25 ppm (1 hour)	Attainment
Lead	1.5 µg/m^3 (calendar quarter)	Attainment	1.5 µg/m^3 (30 day average)	Attainment
Sulfates	No Federal Standards		25 µg/m^3 (24 hour)	Attainment
Hydrogen Sulfide			0.03 ppm (1 hour)	Unclassified
Vinyl Chloride			0.01 ppm (24 hour)	Attainment
Visibility Reducing Particles			Extinction coefficient of 0.23 per kilometer — visibility of 10 miles or more (0.07 to 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent.	Unclassified

Source: CARB, http://www.arb.ca.gov/research/aaqs/aaqs.htm, as of February 22, 2007.

ppm = parts per million, by volume

NA = not applicable

Notes:

[a] National standards, other than ozone, particulate matter, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard.

[b] California standards for ozone, carbon monoxide, sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter (PM_{10}, $PM_{2.5}$, and visibility-reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded.

[c] On February 24, 2006, the CARB transmitted the CO Redesignation Request and Maintenance Plan for the SCAQMD to the EPA for approval.

[d] On February 23, 2007, CARB approved a lowered 1-hour NO_2 standard and a new annual-average NO_2 standard. The new standards became effective on March 20, 2008..

[e] On September 21, 2006, EPA promulgated a new 24-hour $PM_{2.5}$ standard. To attain this standard, the 3-year average of the 98th percentile 24-hour concentration at each population-oriented monitor within an area must not exceed 35 µg/m^3 (effective December 17, 2006). http://www.epa.gov/air/criteria.html

[f] On September 21, 2006, EPA revoked the annual PM_{10} standard, due to lack of evidence linking health problems to long-term exposure to coarse particle pollution. http://www.epa.gov/air/criteria.html

3.2.3.2 Air Toxics Programs

In the early 1980s, CARB established one of the nation's first comprehensive state air toxics programs. The Toxic Air Contaminant Identification and Control Act created a two-step process to identify toxic air contaminants and control their emissions. CARB identifies and prioritizes the pollutants that might be considered toxic air contaminants. CARB assesses the potential for human exposure to a substance, while the Office of Environmental Health Hazard Assessment evaluates the corresponding health effects. Both agencies collaborate in the preparation of a risk assessment report, which concludes whether a substance poses a significant health risk and should be identified as a toxic air contaminant. In 1993, the California Legislature amended the program to identify the 187 hazardous air pollutants (HAP) regulated under the federal HAPS program as California toxic air contaminants. CARB reviews the emission sources of an identified toxic air contaminant and, if necessary, develops air toxics control measures to reduce the emissions. CARB has promulgated 17 Mobile and Stationary Source Airborne Toxic Control Measures (ATCM). Each ATCM is codified in the California Code of Regulations (CCR).

In 1998, CARB identified diesel particulate matter (DPM) as a toxic air contaminant. CARB is responsible for developing statewide programs and strategies to reduce the emissions of toxics by diesel-fueled mobile sources. The diesel-fueled collection and transfer trucks and mobile equipment (loaders, excavators, etc.) would be sources of DPM from the Project.

3.2.3.3 Solid Waste Collection Rule

On December 31, 2004, CARB passed the solid waste collection vehicle (SWCV) rule. This rule applies to all SWCV diesel vehicles at least 14,000 pounds with engines built between 1960 and 2006 that collect waste for a fee. All vehicles subject to the SWCV rule are required to reduce smoke from 100 percent of tier 1 engines and 60 percent of tier 2 engines and label door jams on all applicable SWCVs. This rule applies to Athens and other major commercial haulers who may utilize the Project site.

3.2.3.4 Other Rules

SCAQMD Regulation IV contains a number of prohibitory rules that outline required work practices or other activities to prevent, reduce, or mitigate emissions of air pollutants within the South Coast Air Basin. Rules that would generally apply to operations of materials recycling facilities and waste transfer stations include:

- Rule 401: Visible Emissions
- Rule 402: Nuisance
- Rule 403: Fugitive Dust
- Rule 404: Particulate Matter – Concentration
- Rule 405: Solid Particulate Matter – Weight
- Rule 408: Circumvention
- Rule 410: Odors from Transfer Stations and Material Recovery Facilities

SCAQMD Rule 1133.1. SCAQMD also developed source-specific rules, including a rule that addresses chipping and grinding activities (Regulation XI, Rule 1133.1). This rule applies to operations at the ASVMRF only to the extent that it directs the facility to keep food waste separated from wood-waste chipping and grinding activities.

SCAQMD Rule 1193. This rule applies to government agencies and private entities that operate solid waste collection fleets with 15 or more solid waste collection vehicles. This rule requires public and private solid waste collection fleet operators to acquire alternative-fuel refuse collection heavy-duty vehicles when procuring or leasing these vehicles to reduce air toxic and criteria pollutant emissions.

3.2.4 Clean Air Plans

SCAQMD develops and operates under several planning documents that serve to guide its work toward improving air quality within the South Coast Air Basin, which includes the ASVMRF. The SCAQMD planning documents that would be applicable to a solid waste facility include the regional air quality management plan (AQMP) and the air toxics control plan (ATCP).

3.2.4.1 Air Quality Management Plan

The CCAA, established in 1989, requires local districts to attain and maintain both federal and state ambient air quality standards at the "earliest practicable date." Local districts must prepare air quality plans demonstrating the means by which the ambient air quality standards will be attained and maintained. The AQMP for the South Coast Air Basin is prepared every 3 years. Each iteration is an update of the previous plan and encompasses a 20-year period. Currently, the Final 2007 AQMP was adopted by the AQMD governing board on June 1, 2007. The 2007 AQMP provides the strategies to meet the new, more stringent ozone and $PM_{2.5}$ standards than were in place during development of the 2003 AQMP. One of the four major challenges identified in the 2007 AQMP was that significant reductions in mobile source emissions are necessary to reach attainment of the ozone and $PM_{2.5}$ standards (SCAQMD, 2007a).

3.2.4.2 Air Toxics Control Plan

The ATCP, which was first approved in March 2000, is a SCAQMD planning document designed to examine the overall direction of the SCAQMD's air toxics control program. The ATCP is a planning document and is not part of SIP and not legally binding. The goal of the 2000 ATCP was to reduce air toxic exposures in the South Coast Air Basin in an equitable and cost-effective manner. Since approval of the 2000 ATCP, significant progress has been made in many areas toward reducing air toxic emissions and exposures. Air toxic emissions have reduced approximately 22 percent, or 11 percent by toxicity-weighted emissions, between the baseline year studied for the first ATCP (1997 through 1998) and 2002. According to SCAQMD, this reduction was the result of adopted local, state, and federal regulations. Although mobile source emissions continue to be the predominant contributors (over 90 percent) to regional toxicity levels, stationary sources contribute to impacts in certain neighborhoods in the district.

To continue progress in air toxics reductions, the ATCP was enhanced in April 2004. The addendum provided a status of the various mobile and stationary source strategies in the 2000 ATCP, revised projections based on what has been accomplished, provided new inventory information to reflect updates from the 2003 AQMP, and summarized measures identified in the cumulative impacts reduction strategy and the 2003 AQMP. SCAQMD intends to revise the ATCP in 2008 when it completes its current round of air toxics studies (SCAQMD, 2004).

3.2.5 Environmental Setting

3.2.5.1 Geography and Topography

The ASMRF is located in the San Fernando Valley region of the City of Los Angeles. It is bordered by Burbank in the east, Shadow Hills on the north, Panorama City in the west, Pacoima to the northwest, and North Hollywood in the south. The major freeways in the area are the Golden State (5), Hollywood (170), and Foothill (210) freeways.

The San Fernando Valley is bordered by several mountain ranges, including the San Gabriel, Santa Susana, and Santa Monica mountains. Originally an agricultural area, the San Fernando Valley occupies 260 square miles and now contains several residential suburbs of Los Angeles, including Sun Valley (Encyclopedia Britannica, 2007). The Sun Valley community is in the southeastern part of the San Fernando Valley and is known for housing the highest concentration of mineral processing facilities in Los Angeles, including rock and gravel mining operations, as well as cement and concrete processing. Sun Valley has a generally flat topography, but the community is bordered on the east by the Verdugo Mountains.

3.2.5.2 Climate and Meteorology

The San Fernando Valley climate is dry and sunny most of the year, but is prone to more significant temperature swings than the Los Angeles Basin. Sherman Oaks and Burbank are located near the Project site in the eastern part of the San Fernando Valley. The highest recorded temperature at Sherman Oaks was set in 1990 at 108°F, and the lowest recorded temperature was set in 1949 at 30°F. The community of Burbank has slightly more variation in temperature with a record high of 113°F, in 1971 and record low of 22°F in 1978. Rainfall accumulations tend to be higher in the Valley during the winter rainy season compared with those of the Los Angeles Basin and the coast. Snow in the Valley is very rare. The Valley often has heavy concentrations of smog because it is bordered by mountain ranges, and because vertical motion in the atmosphere is often blocked by temperature inversions.

The Sun Valley climate is generally more moderate than that of the San Fernando Valley region, with average winter temperatures in the mid-50s and average summer temperatures in the mid-70s (WRCC, 2007). Climatological data from the National Weather Service's Burbank station, which is about 3.5 miles from the Project site, shows maximum summer temperatures normally fall in the upper 80s to low 90s, and minimum winter temperatures are normally in the low 40s. Normal annual rainfall is about 17.5 inches per year, with approximately 85 percent of the precipitation occurring from November through April. The prevailing wind direction from the Burbank station is from the south with average wind speeds of 5.7 miles per hour. (WRCC, 2007)

3.2.5.3 Existing Air Quality

The severe air pollution of the South Coast Air Basin is a result of emissions from the nation's second largest urban area and meteorological conditions that often limit dispersion of those emissions. According to the SCAQMD, the average wind speed for Los Angeles is the lowest of the nation's 10 largest urban areas (SCAQMD, 2003a). In addition, the summertime maximum average mixing height (an index of how well pollutants can be dispersed vertically in the atmosphere) in Southern California is the lowest in the

United States. The Southern California area also receives plenty of sunlight, which drives the photochemical reactions that form pollutants such as ozone.

In the South Coast Air Basin, high concentrations of ozone usually occur during the spring and summer months. By contrast, high concentrations of carbon monoxide are generally recorded in late fall and winter. High particulate (PM_{10} and $PM_{2.5}$) concentrations, which can occur throughout the year, occur frequently in fall and winter. Although there are seasonal changes in emissions, the observed variations in pollutant concentrations are more likely a result of changes in weather conditions (SCAQMD, 2003a).

Monitoring stations near the Project site provide information regarding ambient air quality over the past few years. Data from these monitoring stations are collected in the CARB Aerometric Data Analysis and Management ADAM system database and the EPA's AirData database, and is available to the public through each agency's Web site. The following sections provide information on ambient concentrations of the criteria pollutants ozone, NO_2, CO, SO_2, PM_{10}, and $PM_{2.5}$. The closest monitoring station to the ASVMRF is the Burbank—West Palm Avenue station, which is approximately 5 miles southeast of the Project site. Other nearby monitoring stations include: Reseda, Santa Clarita, Los Angeles—North Main Street, and Pasadena—South Wilson Avenue. The following provides a description of each pollutant and monitoring station data for the past 3 years.

Ozone. Ozone is an end product of complex reactions between volatile organic compounds (VOC) and oxides of nitrogen (NO_X) in the presence of intense ultraviolet radiation. VOC and NO_X emissions from millions of vehicles and stationary sources, combined with daytime wind flow patterns, mountain barriers, a persistent temperature inversion, and intense sunlight result in high ozone concentrations.

Short-term and long-term exposure to ozone is a public health concern. Exposure to ozone produces alterations in respiration in shallow, rapid breathing and a decrease in pulmonary performance. Not only does ozone affect breathing patterns, exposure can also result in increased susceptibility to infections, inflammation of lung tissue, and some immunological changes. Ozone can also cause substantial damage to leaf tissues of crops and natural vegetation and damage to many building materials by acting as a chemical-oxidizing agent. For the purpose of state and federal air quality planning, the South Coast Air Basin, including Los Angeles County, is designated as a nonattainment area for ozone.

Table 3.2-2 shows the ozone levels reported at the five monitoring stations during the period from 2004 through 2006, as well as the number of days in which the state 1-hour standard and the federal 8-hour standard were exceeded. The California 1-hour standard is 0.09 parts per million (ppm), and the federal standard, based on an 8-hour averaging period, is 0.08 ppm. The data show that for monitoring years 2004 through 2006, ozone standards were exceeded at all five monitoring stations, although the most recent 2006 data for the Los Angeles—North Main Street station shows no exceedance of the federal NAAQS for the past year.

TABLE 3.2-2
Monitoring Station Results–Ozone

		1-hour		8-hour	
	Year	Highest 1-hour Value (ppm)	Number of Days State Standard Exceeded (0.09 ppm)	Highest 8-hour Value (ppm)	Number of Days State or Federal Standard Exceeded (0.08 ppm)
Burbank—West Palm Avenue	2004	0.137	27	0.109	7
	2005	0.142	13	0.108	2
	2006	0.166	25	0.128	12
Reseda	2004	0.131	54	0.115	30
	2005	0.138	30	0.113	12
	2006	0.158	34	0.109	17
Santa Clarita	2004	0.158	69	0.133	52
	2005	0.173	65	0.141	47
	2006	0.156	62	0.120	40
Los Angeles—North Main Street	2004	0.110	7	0.091	1
	2005	0.121	2	0.098	1
	2006	0.108	8	0.079	0
Pasadena—Wilson Avenue	2004	0.130	27	0.102	10
	2005	0.145	13	0.114	5
	2006	0.151	26	0.117	7

Source: (CARB, 2007b); (EPA, 2007b).
Data as of June 1, 2007.

NO_2 acts as an acute respiratory irritant and, in equal concentrations, is more injurious than NO. However, at atmospheric concentrations, NO_2 is only potentially irritating. There is some indication of a relationship between NO_2 and pulmonary fibrosis. Some increase in bronchitis in young children (two to three years of age) had been observed at concentrations below 0.3 ppm. For purposes of state and federal air quality planning, the South Coast Air Basin is in attainment for NO_2.

Table 3.2-3 shows the NO_2 levels reported at the five monitoring stations during the period from 2004 through 2006, as well as the number of days in which the state and federal standards were exceeded. The averaging period for state and federal NO_2 standards are different. The state NO_2 standard is 0.18 ppm based on a 1-hour period, and the federal standard is 0.053 ppm based on an annual arithmetic mean. Neither the state nor federal standards were exceeded at the five stations during the 2004 through 2006 monitoring period.

TABLE 3.2-3
Monitoring Station Results – Nitrogen Dioxide

		1-hour		Annual Arithmetic Mean	
		Highest Value	Number of Days State Standard Exceeded	Value	Exceeded Y/N
	Year	(ppm)	State (0.18 ppm)	(ppm)	Federal (0.053 ppm)
Burbank—West Palm Avenue	2004	0.122	0	0.033	N
	2005	0.089	0	0.029	N
	2006	0.103	0	0.027	N
Reseda	2004	0.083	0	0.021	N
	2005	0.086	0	0.020	N
	2006	0.073	0	0.018	N
Santa Clarita	2004	0.090	0	0.020	N
	2005	0.087	0	0.019	N
	2006	0.080	0	0.018	N
Los Angeles—North Main Street	2004	0.157	0	0.034	N
	2005	0.126	0	0.027	N
	2006	0.111	0	0.029	N
Pasadena—South Wilson Avenue	2004	0.117	0	0.027	N
	2005	0.104	0	0.024	N
	2006	0.120	0	0.025	N

Sources: (CARB, 2007b); (EPA, 2007b).
Data as of June 1, 2007.

Carbon Monoxide. CO is a product of incomplete combustion principally from automobiles and other mobile sources of pollution. In many areas of California, CO emissions from wood-burning stoves and fireplaces can also be measurable contributors to high ambient levels of CO. Industrial sources typically contribute less than 10 percent of ambient CO levels. Peak CO levels usually occur during winter months as a result of a combination of higher emission rates and stagnant weather conditions.

No direct toxic effects are associated with inhaled CO. However, CO levels are a public health concern because this pollutant competes with oxygen to combine with hemoglobin in the blood to form carboxyhemoglobin that reduces the rate at which oxygen is transported in the bloodstream. Both the cardiovascular system and the central nervous system can be affected when 25 to 40 percent of the hemoglobin in the bloodstream is bound to CO rather than to oxygen.

The portion of Los Angeles County in the South Coast Air Basin is designated as nonattainment for the federal NAAQS for CO. This same area has been designated by CARB as in attainment with the CAAQS for CO. Earlier this year, the SCAQMD submitted a CO maintenance plan to EPA to request redesignation from nonattainment status to maintenance area for CO. On May 11, 2007, EPA released the final rule to redesignate the South Coast Air Basin from nonattainment to attainment for the CO NAAQS under CAA Section 107(d)(3)(E). This rule will be become effective June 11, 2007.

Table 3.2-4 shows the CO levels reported at the five monitoring stations during the period from 2004 through 2006, as well as the number of days in which the state and federal standards were exceeded. Both the state and federal standards include a 1-hour (20 ppm and 35 ppm, respectively) and an 8-hour (9 ppm for both) averaging time. Neither state nor federal standards for CO were exceeded at the five monitoring stations during the 2004 through 2006 monitoring period.

TABLE 3.2-4
Monitoring Station Results – Carbon Monoxide

		1-hour			8-hour		
		Highest Value	Number of Days Standard Exceeded		Highest Value	Number of Days Standard Exceeded	
	Year	(ppm)	State (20 ppm)	Federal (35 ppm)	(ppm)	State (9 ppm)	Federal (9 ppm)
Burbank—West Palm Avenue	2004	4.9	0	0	3.9	0	0
	2005	4.4	0	0	3.4	0	0
	2006	4.3	0	0	3.4	0	0
Reseda	2004	5.1	0	0	3.5	0	0
	2005	5.1	0	0	3.5	0	0
	2006	4.8	0	0	3.5	0	0
Santa Clarita	2004	5.2	0	0	3.7	0	0
	2005	2.2	0	0	1.3	0	0
	2006	2.0	0	0	1.3	0	0
Los Angeles—North Main Street	2004	4.2	0	0	3.2	0	0
	2005	3.9	0	0	3.1	0	0
	2006	3.5	0	0	2.7	0	0
Pasadena—South Wilson Avenue	2004	5.2	0	0	3.5	0	0
	2005	4.3	0	0	2.8	0	0
	2006	4.1	0	0	2.8	0	0

Sources:
8-hour CO Results from (CARB, 2007b) and 1-hour CO Results from (EPA, 2007b). Data as of June 1, 2007.

Sulfur Dioxide. SO_2 is produced when any sulfur-containing fuel is burned. It is also emitted by chemical plants that treat or refine sulfur or sulfur-containing chemicals. Natural gas contains negligible sulfur; fuel oils contain significantly higher amounts. Because of the complexity of the chemical reactions that convert SO_2 to other compounds (such as sulfates), peak concentrations of SO_2 occur at different times of the year in different parts of California, depending on local fuel characteristics, weather, and topography.

Gaseous SO_2 can cause breathing difficulty for people with asthma who are active outdoors, while long-term exposures can cause respiratory illness and aggravate existing heart disease. SO_2 also reacts with other chemicals in the air to form sulfate particles. These particles can gather in the lungs and are associated with increased respiratory symptoms and disease, difficulty in breathing, and premature death. In addition to these physical effects, SO_2 is a contributor to acid rain and accelerates the decay of building materials and paints including irreplaceable monuments, statues, and sculptures. For purposes of state and federal air quality planning, the South Coast Air Basin is designated as in attainment with the SO_2 NAAQS.

Table 3.2-5 shows the SO_2 levels reported at two of the five monitoring stations during the period from 2004 through 2006, as well as the number of days in which the state and federal standards were exceeded. The Reseda, Santa Clarita, and Pasadena—South Wilson Avenue stations do not monitor SO_2. California standards for SO_2 include a 1-hour (0.25 ppm) and 24-hour (0.04 ppm) averaging time. NAAQS includes standards for an annual arithmetic mean (0.03 ppm), 3-hour (0.5 ppm), and 24-hour (0.14 ppm) averaging times. The Burbank monitoring station reported no emissions in excess of the state or federal standards during the 2004 through 2006 monitoring period.

TABLE 3.2-5
Monitoring Station Results – Sulfur Dioxide

		1-hour		3-hour		24-hour			Annual Arithmetic Mean	
		Highest Value	Number of Days Standard Exceeded	Highest Value	Number of Days Standard Exceeded	Highest Value	Number of Days Standard Exceeded		Highest Value	Standard Exceeded Y/N
	Year	(ppm)	State (0.25 ppm)	(ppm)	Federal (0.5 ppm)	(ppm)	State (0.04 ppm)	Federal (0.14 ppm)	(ppm)	Federal (0.03 ppm)
Burbank – West Palm Avenue	2004	0.024	0	0.012	0	0.010	0	0	0.003	N
	2005	0.013	0	0.009	0	0.006	0	0	0.002	N
	2006	0.009	0	0.005	0	0.004	0	0	0.001	N
Reseda	2004	-	-	-	-	-	-	-	-	-
	2005	-	-	-	-	-	-	-	-	-
	2006	-	-	-	-	-	-	-	-	-
Santa Clarita	2004	-	-	-	-	-	-	-	-	-
	2005	-	-	-	-	-	-	-	-	-
	2006	-	-	-	-	-	-	-	-	-
Los Angeles – North Main Street	2004	0.025	0	0.018	0	0.015	0	0	0.003	0
	2005	0.034	0	0.016	0	0.010	0	0	0.002	0
	2006	0.028	0	0.021	0	0.006	0	0	0.002	0
Pasadena – South Wilson Avenue	2004	-	-	-	-	-	-	-	-	-
	2005	-	-	-	-	-	-	-	-	-
	2006	-	-	-	-	-	-	-	-	-

Sources: (EPA, 2007b).
Data as of June 1, 2007.

Coarse Particulates (PM_{10}). Particulates in the air are caused by a combination of wind-blown fugitive dust; particles emitted from combustion sources (usually carbon particles); and organic, sulfate, and nitrate aerosols formed in the air from emitted hydrocarbons, sulfur oxides, and nitrogen oxides. In 1984, CARB adopted standards for PM_{10}, and phased out the total suspended particulate (TSP) standards that had previously been in effect. PM_{10} standards were substituted for TSP standards because PM_{10} corresponds to the size range of inhalable particulates related to human health. In 1987, EPA also replaced national TSP standards with PM_{10} standards.

PM_{10} can affect human health by getting deep into the lungs and interfering with the body's mechanism for clearing the respiratory tract; some particles could also get into the bloodstream. Exposure to particulate has caused health problems including aggravated asthma, increased respiratory symptoms, decreased lung function, chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. PM_{10} can also be carried over long distances by wind and settle on ground or water, and contribute to changes in the pH and nutrient balances of water bodies, depletion of soil nutrients, and damage to sensitive forests and farm crops. For air quality planning purposes, the South Coast Air Basin is considered to be in nonattainment of both federal and state PM_{10} standards.

Table 3.2-6 shows the PM_{10} levels reported at three of the five monitoring stations near the Project site during the period 2004-2006, as well as the number of days in which the state and federal standards were exceeded. The Reseda and Pasadena – South Wilson Avenue monitoring stations do not monitor for PM_{10} levels. Both the state and EPA have established 24-hour and annual arithmetic mean standards. The state standards are set at 50 micrograms per cubic meter ($\mu g/m^3$) and 20 $\mu g/m^3$, and federal standards are set at 150 $\mu g/m^3$ and 50 $\mu g/m^3$, respectively. As indicated in Table 3.2-1, however, on September 21, 2006, EPA revoked the annual PM_{10} standard due to a lack of evidence linking health problems to long-term exposure to coarse particulate pollution. As shown in Table 3.2-6, although all of the available maximum values were below federal standards, they exceeded the more stringent state limits.

Fine Particulates ($PM_{2.5}$). Fine particulates in the air are caused by a combination of particles emitted from combustion sources (usually carbon particles); and organic, sulfate, and nitrate aerosols formed in the air from emitted hydrocarbons, sulfur oxides, and nitrogen oxides. In 1997, EPA established 24-hour and annual arithmetic mean standards for particulate matter with an aerodynamic diameter less than 2.5 microns ($PM_{2.5}$). EPA designated $PM_{2.5}$ attainment and nonattainment areas in 2004.

$PM_{2.5}$ can damage human health by getting deep into the lungs and interfering with the body's mechanism for clearing the respiratory tract; some particles could get into the bloodstream. Exposure to particulate has caused health problems including aggravated asthma, increased respiratory symptoms, decreased lung function, chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. $PM_{2.5}$ is also a major cause of reduced visibility. For air quality planning purposes, the South Coast Air Basin has a nonattainment designation for both the federal and state $PM_{2.5}$ standards.

TABLE 3.2-6
Monitoring Station Results – PM_{10}

		24-hour			Annual Arithmetic Mean		
		Highest Value[b]	Number of Days Standard Exceeded[a]		Mean Value[b]	Standard Exceeded Y/N	
	Year	(µg/m^3)	State (50 µg/m^3)	Federal (150 µg/m^3)	(µg/m$^{3)}$	State (20 µg/m^3)	Federal (50 µg/m^3)
Burbank—West Palm Avenue	2004	74	38.2	0	37.7	Y	N
	2005	92	29.6	0	34.6	Y	N
	2006	71	d	0	31.7	Y	N
Reseda[c]	2004	-	-	-	-	-	-
	2005	-	-	-	-	-	-
	2006	-	-	-	-	-	-
Santa Clarita	2004	54	6.5	0	28.1	Y	N
	2005	55	6.1	0	25.6	Y	N
	2006	53	7.0	0	23.4	Y	N
Los Angeles—North Main Street	2004	72	30.4	0	32.7	Y	N
	2005	70	17.8	0	29.6	Y	N
	2006	59	18.1	0	30.1	Y	N
Pasadena—South Wilson Avenue[c]	2004	-	-	-	-	-	-
	2005	-	-	-	-	-	-
	2006	-	-	-	-	-	-

[a] Measurements are usually collected every 6 days. Measured days counts the days that a measurement was greater than the level of the standard; Estimated days mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored. Number of days exceeded is estimated number of days exceeded.

[b] Highest pollutant concentrations for 24-hour and annual records provided in the CARB ADAM.

[c] The Reseda and Pasadena—South Wilson Avenue monitoring stations do not monitor PM10 levels.

[d] Insufficient (or no) data available to determine the value.

Sources: (CARB, 2007b); (EPA, 2007b).
Data as of June 1, 2007.

Table 3.2-7 shows the $PM_{2.5}$ levels reported at the four of the five monitoring stations during the period from 2004 through 2006, as well as the number of days in which the state and federal standards were exceeded. The Santa Clarita monitoring station does not monitor for $PM_{2.5}$ levels. There are annual arithmetic mean standards at both the state and federal level; the state standard is set at 12 µg/m^3 and NAAQS is set at 15 µg/m^3. A 24-hour NAAQS as also been established at 35 µg/m^3. Available data show exceedance of both the state and federal annual standards for all monitoring sites. Exceedance of the 24-hour federal standard has also been recorded at the Los Angeles—North Main Street monitoring station.

TABLE 3.2-7
Monitoring Station Results – $PM_{2.5}$

		24-hour		Annual Arithmetic Mean		
		Highest Value[b]	No. Exceeded	Mean Value[b]	Exceeded Y/N	
	Year	(µg/m^3)	Federal (35 µg/m^3)+	(µg/m^3)	State (12 µg/m^3)	Federal (15 µg/m^3)
Burbank—West Palm Avenue	2004	60.1	0	19.1	Y	Y
	2005	63.1	0	17.8	Y	Y
	2006	50.7	6	16.5	Y	Y
Reseda	2004	56.2	0	15.7	Y	Y
	2005	39.5	0	*	Y	Y
	2006	44.0	1	12.8	Y	N
Santa Clarita[a]	2004	-	-	-	-	-
	2005	-	-	-	-	-
	2006	-	-	-	-	-
Los Angeles—North Main Street	2004	75	2	18.6	Y	Y
	2005	73.7	2	17.8	Y	Y
	2006	56.2	11	15.6	Y	Y
Pasadena—South Wilson Avenue	2004	59.4	0	16.6	Y	Y
	2005	62.8	0	15.1	Y	Y
	2006	45.8	1	13.4	Y	N

* Insufficient (or no) data available to determine the value.

[a] The Santa Clarita monitoring station does not monitor PM2.5 levels.

[b] Highest pollutant concentrations for 24-hour and annual records provided in the CARB ADAM database. Data not available from the CARB Web site, 2006 Reseda annual average, was supplied by the EPA AirData database.

+ The annual $PM_{2.5}$ standard was revised to 35 ug/m^3 effective December 17, 2006. Therefore the number of exceedances in 2004 and 2005 represent exceedances of the old standard of 65 ug/m^3.

Sources: (CARB, 2007b); (EPA, 2007b).
Data as of June 1, 2007.

3.2.5.4 Toxic Air Contaminants

CARB is required by State law to identify and control toxic air contaminants. In 1985, CARB established a twenty station toxic monitoring network within major urban areas to provide data to determine the average annual concentrations of toxic air contaminants as input to the identification process, and to assess the effectiveness of controls. The SCAQMD monitors this network that produces a statewide annual average to support the determination of a statewide risk assessment. Although sampling supports a statewide average, data for individual sites cannot be used too broadly. Under the statewide program, cancer risk is driven by three primary pollutants: particulate matter from diesel fuel use, benzene, and 1,3-butadiene. Diesel particulate matter is associated with about 70 percent of cancer risk; therefore, this report will focus on diesel particulate matter emissions. Diesel particulate matter concentrations are captured in the $PM_{2.5}$ monitoring data that is already collected so diesel particulate matter is not part of the toxics sampling network.

3.2.5.5 Sensitive Receptors

A sensitive receptor is a type of land use for individuals who might be more susceptible to the effects of air pollution than the general population (SCAQMD, 1993). SCAQMD defines the following land uses as sensitive receptors; hospitals, nursing homes, long-term health care facilities, rehabilitation centers, athletic facilities, schools, child care centers, and residences. Existing sensitive receptors are located within a mile of the Project site as shown in **Figure 3.2-1**.

3.2.6 Impacts and Mitigation Measures

The potential air quality impacts occurring during construction and operation of the Project were evaluated for two baselines. The first baseline condition describes existing conditions at the site where approximately 400 tpd of C&D materials are processed outdoors. The second baseline compares the Project to the CUP, which allows for 1,500 tpd of waste and recyclable materials to be processed outdoors. The following discussion summarizes the quantitative thresholds of significance, the methodology used to evaluate the impacts of the Project, and the results of the analysis. Applicable mitigation measures and residual impacts are also presented. Appendix B includes the results of the air quality emission calculations for construction and operation.

3.2.6.1 Thresholds of Significance

The Athens Sun Valley MRF is located in the City of Los Angeles and is subject to the SCAQMD rules and regulations. The following sections summarize the significance thresholds used to assess whether air quality impacts would be significant. The impacts of the Project were assessed using the SCAQMD quantitative thresholds of significance and the CEQA Guidelines. For the purposes of this analysis, VOCs, reactive organic gases (ROG), and reactive organic compounds (ROC) were considered to be the same. The SCAQMD has established mass daily regional significance thresholds and localized significance thresholds. The Project construction and operation phases would occur in sequence; therefore, the Project phase emissions were evaluated separately against the significance thresholds.

Project sites that are 5 acres or less in size can use the SCAQMD-developed Localized Significance Thresholds (LSTs) in lieu of conducting dispersion modeling analyses to determine whether or not a Project could generate significant localized air quality impacts associated with construction or operation (SCAQMD, 2003b; 2006). The LSTs are organized in mass rate look-up tables and have been developed for 1-acre, 2-acre, and 5-acre sites for various downwind locations ranging from 25 meters (m) to 500 m. These thresholds were developed from modeling analyses designed to comply with the ambient air quality thresholds established by SCAQMD. The LSTs developed by SCAQMD, and applicable to onsite emissions from the Project (NO_x, PM_{10}, $PM_{2.5}$, and CO), are shown in **Table 3.2-8**. Since the Project site is 4.9 acres in size, onsite construction and operation emissions were compared to the SCAQMD LSTs for 5-acre sites. **Table 3.2-8** presents the construction and operational regional and localized significance thresholds established by the SCAQMD. The onsite emissions were evaluated against the LSTs and the total emissions (onsite plus offsite) were evaluated against the regional significance thresholds (RSTs).

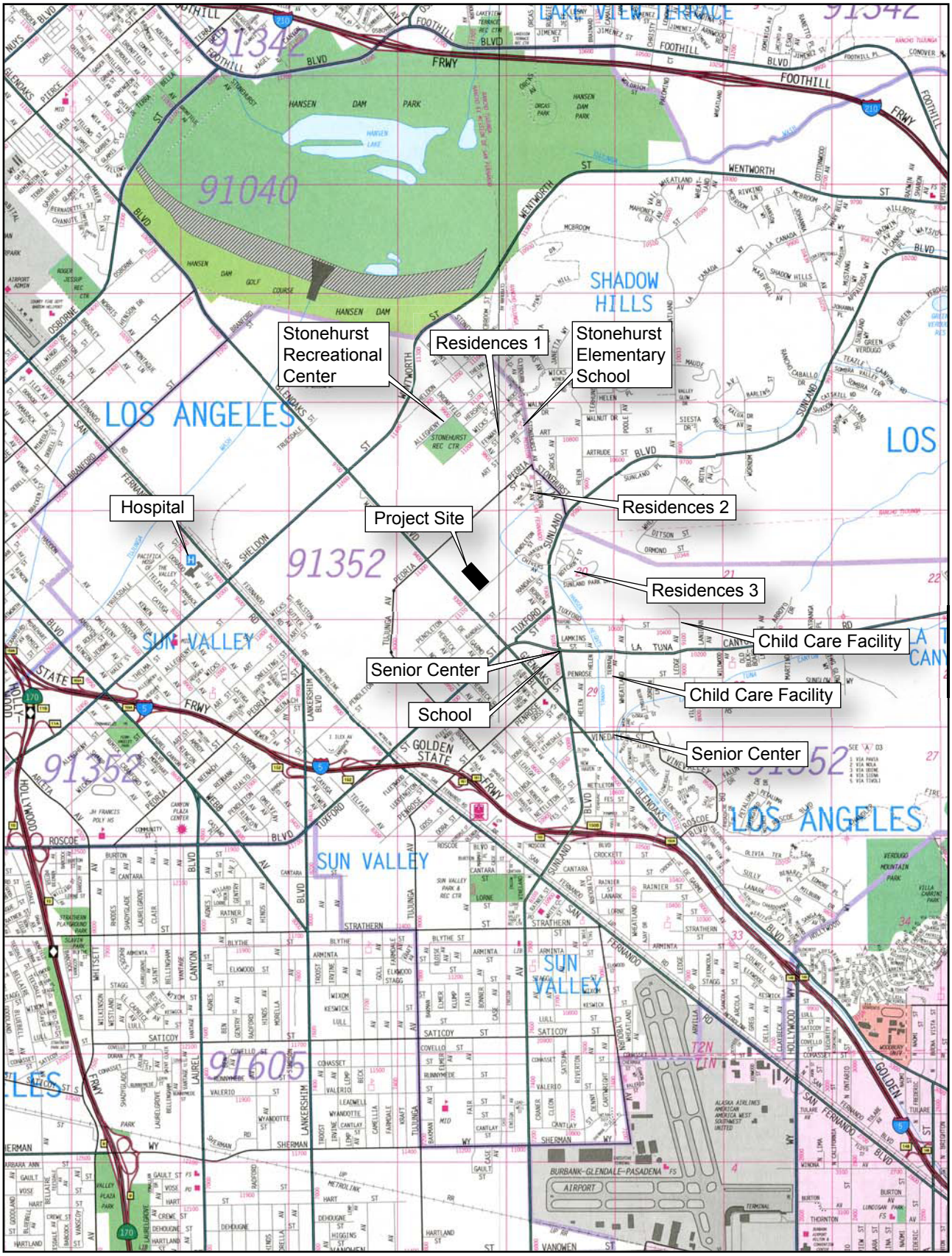


FIGURE 3.2-1
Sensitive Air Quality Receptors in the Project Area
Athens Sun Valley MRF

Source: Thomas Guide, Los Angeles and Orange Counties, 2003.

TABLE 3.2-8
SCAQMD Significance Thresholds

	Regional Significance Thresholds		Localized Significance Thresholds*	
Pollutant	**Construction (lb/day)**	**Operation (lb/day)**	**Construction (lb/day)**	**Operation (lb/day)**
NO_X	100	55	304	304
VOC	75	55	NA	NA
PM_{10}	150	150	173	42
$PM_{2.5}$	55	55	28	7
SO_X	150	150	NA	NA
CO	550	550	3,497	3,497

Sources: (SCAQMD, 2007b; 2003b; 2006)

NA = Not applicable, LSTs have not been established for SOX or VOC.

* Based on Project location 'East San Fernando Valley' and assumes a receptor distance of 200 meters for a 5-acre site. LSTs are only applicable to NOX, CO, PM10, and PM2.5.

In addition to comparison to the SCAQMD significance thresholds, the impacts were evaluated against the following CEQA Guidelines, Appendix G, air quality checklist questions. Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

The following sections provide a summary of the methodology used to estimate emissions, an evaluation of the Project impacts by a comparison of the construction and operation emissions to the significance thresholds, and address the CEQA checklist questions.

3.2.6.2 Emission Estimation Methodology

Emissions were estimated for two separate phases of the Project: construction and operational.

3.2.6.3 Construction Phase

Construction emissions were calculated for the following sources; exhaust emissions from construction equipment, fugitive dust emissions from site grading, ROG emissions from asphalt paving, and exhaust and fugitive dust emissions associated with construction worker travel.

A source of emissions during construction would be exhaust gas emissions from construction equipment and worker commute vehicles. Construction equipment exhaust gas contains CO, NO_x, PM_{10}, oxides of sulfur (SO_x), and VOCs. Construction equipment exhaust emissions were estimated from the SCAQMD summary of the CARB OFFROAD model emission factors (EF) for the year 2008 (SCAQMD, 2008a). Construction activities can be split into three phases: demolition, grading, and building construction (Jones & Stokes, 2005). The additional building will occur in an open area and will not require demolition. Construction emissions were calculated for the grading phase and the construction phase. The construction phase resulting in the highest emissions, the construction of buildings, was used to compare to the SCAQMD significance thresholds.

The vehicle miles traveled by construction workers commuting to the construction site would create exhaust gas emissions. Exhaust emissions include CO, NO_x, PM_{10}, $PM_{2.5}$, SO_x, ROG, and entrained road dust (PM_{10} and $PM_{2.5}$). Vehicle emissions associated with construction employees' commute were calculated using the SCAQMD Highest, Most Conservative table of EMFAC2007 (v 2.3) EFs for light duty automobiles (SCAQMD, 2008b). Entrained road dust emissions resulting from construction employees' commute miles were estimated using *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Chapter 13.2.1* (EPA, 2006).

In addition to exhaust emissions, two construction activities were evaluated for the Project; grading that produces fugitive dust emissions (PM_{10}) and asphalt paving that produces ROG emissions. Grading would be done to prepare the site for construction and asphalt paving would be done for courtyards, parking lots, and other open areas. Emissions associated with construction activities were based on the emission and daily use factors provided in the *URBEMIS2002 Emission Estimation for Land Use Development Projects* (Jones & Stokes, 2005).

3.2.6.4 Operational Phase

Operational emissions consist of mobile and stationary sources. The stationary equipment would be electrically powered and would be expected to result in minor emissions when compared to the mobile sources. Therefore, operation emissions for the Project were estimated for the incremental increase in mobile source emissions when compared to the 400-tpd and 1,500-tpd baselines. The outdoor processing operation would result in fugitive dust emissions . Since the project would enclose the processing operations (including the tub grinders) within the C&D processing buildings, fugitive dust emissions from processing operations were not estimated. Mobile source emissions were estimated for two types of sources; off-road equipment and on-road vehicles. Onsite emissions would result from the off-road equipment, such as loaders, used to move waste from trucks to the electric sorting and processing equipment and from the collection and transfer trucks idling at the scales and during unloading/loading. Offsite emissions would result from the collection and transfer trucks as these vehicles drive between pick-up sites, the transfer station, and landfills. Collection trucks, transfer trucks, employee commute, and off-road equipment would contribute to exhaust and fugitive dust emissions. **Table 3.2-9** presents the numbers and types of off-road equipment, and **Table 3.2-10** presents the number of truck trips used to estimate emissions.

TABLE 3.2-9
Project Equipment Mix

Equipment Type	400-tpd Baseline	1,500-tpd Baseline	Project: 1,500-tpd (1,000 MSW, 500 C&D)
Mobile Equipment			
Loaders	3	4	4
Excavators	3	4	4
Forklifts	1	1	2
Sweeper	1	1	1
C&D Equipment			
Material Feed/Incline Conveyor	1	1	1
Trommel and transfer conveyor	1	1	1
C&D sorting conveyor	1	1	1
Tub Grinders	2	2	2
Dirt Screen	1	1	1
MRF Equipment			
Infeed and Infeed Conveyor	0	0	1
Screened Material infeed and incline conveyor	0	0	1
Presort Conveyor	0	0	1
Sorting Conveyors	0	0	2
Baler Infeed conveyor	0	0	1
Baler	0	0	1
Screens	0	0	3
Transfer Conveyors	0	0	4

TABLE 3.2-10
Daily Project Traffic

Trip Type	400-tpd Baseline	1,500-tpd Baseline	Project: 1,500-tpd (1,000 MSW, 500 C&D)
Incoming	80	300	200
Outgoing	17	65	65
Employee Trips	25	62	65
Total Trips	122	427[a]	330

[a] Note that the number of trips generated by the Project is less than the number of trips (440) associated with the approved Mitigated Negative Declaration for the CUP granted in 1999.

Off-road equipment exhaust emissions were estimated from the SCAQMD summary of the CARB OFFROAD model EFs for the year 2007 for existing operations and the year 2009 for the Project (SCAQMD, 2008a). On-road mobile source operational emissions were calculated using the SCAQMD Highest, Most Conservative table of EMFAC2007 (v 2.3) EFs for light duty automobiles, delivery trucks, and heavy-heavy duty diesel trucks (SCAQMD, 2008b). Entrained road dust emissions resulting from construction employees' commute miles were estimated using *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Chapter 13.2.1* (EPA, 2006).

3.2.6.5 Construction Emissions

This subsection presents the potential air quality impacts from construction of the Project by comparison to the SCAQMD significance thresholds and CEQA Guideline questions.

As an industrial use, the Project is consistent with the land use designation for the Project site in the Sun Valley—La Tuna Canyon Community Plan (SVLTCCP). This Community Plan was adopted in 1999, the same year that the CUP for the Project site was approved.

Impact AQ-1: Short-term Emissions from Construction (Less than Significant Impact)

The construction activities for the Project would be completed in phases such that the emissions generated during the grading phase would not coincide with emissions generated during the building construction or paving phase. Exhaust emissions from construction equipment would result in short-term emissions of CO, NO_X, PM_{10}, $PM_{2.5}$, SO_X, and VOC. The highest emissions from the construction phases were compared to both the SCAQMD regional and localized significance thresholds to evaluate the air quality impacts. As shown in **Table 3.2-11**, the peak daily construction emissions would be less than both the SCAQMD regional and localized significance thresholds. Therefore, the air quality impact from construction of the Project would be less than significant.

TABLE 3.2-11
Construction Related Emissions – Proposed Project

Emission Category	Emissions (lb/day)					
	CO	NO_X	PM_{10}	$PM_{2.5}$	SO_X	VOC
Construction Equipment	36	81	4.8	4.7	0.08	12
Construction Activities	NA	NA	32	6.7	NA	5.4
Worker Commute	3.16	0.33	0.12	0.04	0.003	0.32
Construction Total	**39**	**81**	**37**	**11**	**0.08**	**17**
SCAQMD Regional Significance Threshold	**550**	**100**	**150**	**55**	**150**	**75**
Significant (Yes/No)	**No**	**No**	**No**	**No**	**No**	**No**
SCAQMD Localized Significance Threshold	**3,497**	**304**	**173**	**28**	**NA**	**NA**
Significant (Yes/No)	**No**	**No**	**No**	**No**	**No**	**No**

NA= Not applicable, LSTs have not been established for SOX or VOC.

Construction activities resulting in fugitive dust emissions would be required to comply with SCAQMD Rule 403 which establishes limits on PM_{10} emissions and recommends the implementation of best available control measures for different sources of dust emissions.

Control measures to be implemented in conjunction with this project include the stabilization of disturbed soil throughout the construction site, the stabilization of loose soil and demolition debris, stabilization of construction materials while unloading, stabilizing stockpiles, and pre-watering of materials prior to unloading.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

3.2.6.6 Operation Emissions

This section evaluates the air quality impacts of operation of the Project to the two baseline conditions described in the introduction to this section.

Impact AQ-2: Consistency with Plans (Less than Significant Impact)

The SCAQMD 2007 Final AQMP presents the strategy to continue to improve air quality in the South Coast Air Basin. The plan includes emission reductions achieved from existing and proposed regulations and strategies for attaining the $PM_{2.5}$ standard by 2015 and the 8-hour ozone standard by 2024. The diesel-fueled collection and transfer trucks utilizing the Athens Sun Valley MRF would be required to comply with the control measures outlined for mobile sources in the 2007 Final AQMP.

The Project also lies within the SVLTCCP Area of the City of Los Angeles. This Community Plan for the Sun Valley—La Tuna Canyon is part of the City of Los Angeles General Plan. The General Plan includes an Air Quality Element, which was evaluated for consistency with the Project (City of Los Angeles, 1991). Specifically, the Project would be consistent with the Goal 5 policy, "Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling"(City of Los Angeles, 1991). The Project would divert MSW from landfills and improve recycling and would include installation of a 2-kilowatt (kW) solar power system. The Project is consistent with the SCAQMD Final 2007 AQMP and the policies in the Air Quality Element of the City of Los Angeles General Plan Air Quality Element. Therefore, the Project impact would be less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact AQ-3: Localized Concentrations of CO (Less than Significant Impact)

The purpose of this CO hot spot analysis is to evaluate whether roadway intersections affected by the Project would cause or contribute to a localized violation of the CO NAAQS or CAAQS. According to the Guideline for Modeling CO from Roadway Intersections, "…the criteria for intersection modeling depend on whether the Project has the potential to create an adverse air quality impact by either significantly increasing traffic or reducing distances from receptors where the public has general access" (EPA, 1992). As shown in the *Draft Sun Valley Athens Waste Facility Traffic Impact Study*, the Project would not degrade level of service (LOS) for the signalized intersections analyzed when compared to the 400-tpd baseline or the 1,500-tpd permitted baseline (Meyer, Mohaddes Associates, 2007). Operation of the Project would not change the distance of vehicle emissions to receptors because vehicles would be expected to travel the same routes to the facility for the Project as the existing conditions. Furthermore, EPA recently ruled to redesignate the South Coast Air Basin from nonattainment to attainment since the SCAQMD demonstrated the area has been

attaining the federal CO standards (EPA, 2007c). The Project would not be anticipated to produce a CO hot spot or contribute to a violation of a CO ambient air quality standard. Therefore, the air quality impact would be less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact AQ-4: Odors Generated by Receipt of MSW for the Project (Less than Significant Impact)

One objective of the Project would be to provide additional capacity to divert MSW from landfills. However, the addition of MSW to the facility could generate new odors since MSW is not currently processed at the facility. The Project will achieve odor control by implementing MSW processing operations indoors within enclosed buildings with forced air ventilation and filtration. In addition, odors will be limited by the use of an odor neutralizer as part of the misting system and removal of any nonsalvageable waste within 48 hours of its receipt on a first-in, first-out basis. These measures will be incorporated into an Odor Management Plan for review and approval by the EA in accordance with the requirements of SCAQMD Rule 410. Therefore, the air quality impact from odors would be expected to be less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact AQ-5: 400-tpd Baseline: Long-term Emissions of CO, SO_X, PM_{10}, and $PM_{2.5}$ (Less than Significant Impact)

This analysis compares the Project to the existing conditions at the Project site where approximately 400 tpd of C&D materials are processed outdoors. Emissions associated with collection trucks, transfer trucks, employee commute, and mobile equipment were evaluated. As shown in **Table 3.2-12**, the incremental increase in onsite emissions of CO, PM_{10}, $PM_{2.5}$, and SO_X with this baseline would be less than the SCAQMD localized significance thresholds.

TABLE 3.2-12
Operation Emissions 400-tpd Baseline: Incremental Increase in Emissions

	Emissions (lb/day)			
	CO	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Onsite: Increase in Operation Emissions	13	1.7	1.5	0.03
SCAQMD Localized Significance Threshold	**3,497**	**42**	**7**	**NA**
Significant (Yes/No)	**No**	**No**	**No**	**No**
Offsite: Increase in Operation Emissions	384	82	24	0.7
Total Increase in Operation Emissions (Onsite plus Offsite)	**396**	**83**	**25**	**0.7**
SCAQMD Regional Significance Threshold	**550**	**150**	**55**	**150**
Significant (Yes/No)	**No**	**No**	**No**	**No**

NA – Not applicable, LSTs have not been established for SO_X.

In addition, the total incremental increase in emissions (onsite plus offsite) would be less than the SCAQMD regional significance thresholds. Therefore, the air quality impact from operation of the Project for the pollutants CO, PM_{10}, $PM_{2.5}$, and SO_X would be less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact AQ-6: 400-tpd Baseline: Long-term Emissions of VOC and NO_X (Potentially Significant Impact)

This analysis compares the Project to the existing conditions at the Project site where approximately 400 tpd of waste and recyclable materials are processed outdoors. Emissions associated with collection trucks, transfer trucks, employee commute, and onsite mobile equipment were evaluated. As shown in **Table 3.2-13**, the incremental increase in onsite emissions of VOC and NO_X with this baseline would be less than the SCAQMD localized significance thresholds. However, the total incremental increase in emissions (onsite plus offsite) would be greater than the SCAQMD regional significance thresholds. The increase in truck trips to and from the facility result in the higher VOC and NO_X emissions when compared to the 400 tpd existing baseline. The air quality impact from operation of the Project when compared to the 400 tpd baseline would be potentially significant for VOC and NO_X.

TABLE 3.2-13
Operation Emissions 400-tpd Baseline: Incremental Increase in VOC and NO_X Emissions

	Emissions (lb/day)	
	VOC	**NO_X**
Onsite: Increase in Operation Emissions	3	25
SCAQMD Localized Significance Threshold	**NA**	**304**
Significant (Yes/No)	**No**	**No**
Offsite: Increase in Operation Emissions	64	623
Total Increase in Operation Emissions (Onsite plus Offsite)	**67**	**648**
SCAQMD Regional Significance Threshold	**55**	**55**
Significant (Yes/No)	**Yes**	**Yes**

NA – Not applicable, LSTs have not been established for VOC.

Mitigation Measures. Under CEQA, all feasible mitigation measures must be used to minimize adverse air quality impacts. The SCAQMD has prepared a table of mitigation measures that includes on-road engines. The list of mitigation measures for on-road engines is primarily intended to reduce particulate matter emissions. However, the *Longview* filter manufactured by Cleaire, has been used on refuse trucks and provides a NO_X emission reduction of 25 percent. Additional CARB verified control technologies are included in Appendix B. The following mitigation measures are proposed to reduce NO_X and VOC emissions:

- Implement feasible NO_X emission reduction technologies, such as the Cleaire filter described above, to determine whether this would be an option for diesel-fueled trucks.
- Maintain mobile equipment in tune with the manufacturer's specifications.
- Maintain diesel-fueled collection and transfer trucks in tune with the manufacturer's specifications.
- To the extent feasible, utilize alternative-fueled or electric mobile equipment.

Residual Impacts. The residual air quality impact after application of the proposed Mitigation Measures would be expected to be significant and unavoidable.

Impact AQ-7: 400-tpd Baseline: Sensitive Receptors (Potentially Significant Impact)

As shown under Impact AQ-6 above, VOC and NO_X emissions would exceed the SCAQMD thresholds with this baseline. Therefore, sensitive receptors would be exposed to substantial VOC and NO_X emissions resulting in a potentially significant impact. The same mitigation measures identified under Impact AQ-6 are proposed for Impact AQ-7.

In addition to criteria pollutants, sensitive receptors may be exposed to diesel particulate matter. As stated above, diesel particulate matter is associated with about 70 percent of cancer risk; therefore, this discussion will focus on diesel particulate matter emissions. In order to address the health risk posed by diesel particulate matter, CARB and SCAQMD have implemented ATCMs and rules to reduce diesel particulate matter emissions. The following ATCMs and rules apply to the Project:

- ATCM for On-Road Heavy-Duty Diesel-Fueled Residential and Commercial Solid Waste Collection Vehicles
- ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- SCAQMD Rule 1193 Clean On-Road Residential and Commercial Refuse Collection Vehicles

These ATCMs and Rule 1193 will result in continued reductions in diesel particulate matter emissions over time as the emission standards and use of alternative fuels are phased in. As shown in **Table 3.2-14**, there would be a slight increase in onsite diesel PM_{10} and $PM_{2.5}$ emissions with this baseline. However, these emissions were estimated using the highest, most conservative EMFAC2007 emissions factors and do not include reductions based on compliance with the ATCMs or Rule 1193.

TABLE 3.2-14
400-tpd Baseline: Diesel Particulate Matter Emissions

	Emissions (lb/day)	
	Diesel PM_{10}	**Diesel $PM_{2.5}$**
Onsite: Incremental Change in Emissions	1.09	1.08

A formal Human Health Risk Assessment (HHRA) was not prepared for the Project in part because the diesel particulate matter emissions from collection and transfer trucks are

expected to decrease in the next few years through compliance with CARB and SCAQMD requirements. CARB estimates that compliance with SWCV Rule would achieve a reduction in toxic PM emissions from collection vehicles by as much as 81 percent by 2010 and 85 percent by 2015 from levels that existed in 2000 (CARB, 2006). Additionally, a nearby facility (the Bradley landfill located less than 0.5 mile east of the Sun Valley transfer station) with a higher number of average daily diesel-powered truck trips than would operate at the proposed Athens Sun Valley MRF recently performed a HHRA and found that the cancer and noncarcinogenic (acute and chronic) risk would be less than significant. The Bradley Landfill DEIR evaluated the health risk associated with onsite emissions from 876 daily diesel truck trips (608 SWCV and 268 transfer trucks). The Bradley HHRA evaluated the increase in diesel particulate emissions to determine the additional cancer burden and the two noncarcinogenic risks, Acute Hazard Index (HI) and Chronic HI, as required by SCAQMD Rule 1401. The Bradley HHRA indicated that the risk at all of the offsite receptors would be much lower than the California Reference Exposure Level (REL) for the additional cancer burden, the Acute HI and the Chronic HI. Therefore, it was determined that the cancer and noncarcinogenic risks associated with the Bradley Landfill Project would be less than significant.

Under the Project, the Athens Sun Valley MRF would have 265 daily diesel truck trips (200 SWCV and 65 transfer trucks), which is a net increase of 168 daily diesel truck trips from the 400-tpd baseline operation. The results of the Bradley Landfill HHRA indicated that the additional cancer burden and noncarcinogenic risk for 876 additional daily diesel truck trips would be less than significant. Since the Project would result in much fewer daily diesel-powered truck trips than the number used in the Bradley Landfill HHRA, it was assumed that the cancer and noncarcinogenic risks associated with the Project would be less than significant. Therefore, sensitive receptors would not be expected to be exposed to substantial diesel particulate matter concentrations and the impact would be less than significant.

Mitigation Measures. The mitigation measures listed under Impact AQ-6 would apply to Impact AQ-7. No mitigation measures are needed for diesel particulate matter.

Residual Impacts. Impacts would be less than significant.

Impact AQ-8: 1,500-tpd Baseline: Long-term Emissions of CO, NO_X, VOC, SOX, PM_{10}, and $PM_{2.5}$ (Less than Significant Impact)

This analysis compares the Project to the permitted conditions at the Project site where approximately 1,500 tpd of waste materials would be processed outdoors. Emissions associated with collection trucks, transfer trucks, employee commute, and onsite mobile equipment were evaluated. As shown in **Table 3.2-15**, there would be a net decrease in onsite emissions of CO, NO_X, VOC, PM_{10}, $PM_{2.5}$, and SO_X with this baseline and the onsite emissions would be less than the localized significance thresholds. In addition, the total incremental increase in emissions (onsite plus offsite) would be less than the SCAQMD regional significance thresholds. Therefore, the air quality impact from operation of the Project with this baseline would be less than significant.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

TABLE 3.2-15
Operation Emissions 1,500-tpd Baseline: Incremental Increase in Emissions

	Emissions (lb/day)*					
	CO	**NO_X**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**	**VOC**
Onsite: Increase in Operation Emissions	(-6)	(-19)	(-6.5)	(-4.8)	(-0.003)	(-3)
SCAQMD Localized Significance Threshold	**3,497**	**304**	**42**	**7**	**NA**	**NA**
Significant (Yes/No)	**No**	**No**	**No**	**No**	**No**	**No**
Offsite: Increase in Operation Emissions	90	(-308/)	(-14)	(-18)	(-0.07)	(-10)
Total Increase in Operation Emissions (Onsite plus Offsite)	**84**	**(-327)**	**(-20)**	**(-23)**	**(-0.07)**	**(-14)**
SCAQMD Regional Significance Threshold	**550**	**100**	**150**	**55**	**150**	**75**
Significant (Yes/No)	**No**	**No**	**No**	**No**	**No**	**No**

*Values in parentheses are less than zero.
NA = Not applicable, LSTs have not been established for SOx or VOC.

Impact AQ-9: 1,500-tpd Baseline: Sensitive Receptors (Less Than Significant Impact)

As shown in **Table 3.2-16**, there would be a net decrease in diesel particulate matter emissions by comparing the Project to the 1,500-tpd permitted baseline. Therefore, the cancer risk associated with the Project would be less than the cancer risk associated with the 1,500-tpd permitted baseline. Furthermore, as shown under Impact AQ-8, the incremental increase in emissions from the Project would be less than the SCAQMD significance thresholds. Therefore, sensitive receptors would not be expected to be exposed to substantial pollutant concentrations and the air quality impact would be less than significant with this baseline.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

TABLE 3.2-16
1,500-tpd Baseline: Diesel Particulate Matter Emissions

	Emissions (lb/day)*	
	Diesel PM_{10}	**Diesel $PM_{2.5}$**
Onsite: Incremental Change in Emissions	(-0.78)	(-0.75)

*Values in parentheses are less than zero.

3.2.7 Cumulative Impacts

Cumulative impacts are impacts that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of the Project. Cumulative impacts can result from individually minor, but collectively substantial impacts taking place over a period of time. For air quality, cumulative impacts were evaluated at the regional scale by comparison to related Projects and for consistency with the General Plan. In addition, cumulative impacts from diesel particulate matter are discussed.

3.2.7.1 Relationship to Related Projects

Cumulative impacts were evaluated for the Project plus related projects. **Table 3.2-17** presents the related Projects that were used to evaluate the cumulative impacts. With the 400-tpd baseline, the Project would have a potentially significant cumulative impact on ozone concentrations due to the VOC and NO_X emissions presented for Impact AQ-6. With the 1,500-tpd baseline, the Project would not be expected to have a cumulative impact to air quality.

TABLE 3.2-17
Trips from Related Projects

Project Description	Number of Daily Trips
Pendleton Street Open Air Market	6,537
Sun Valley Care Ministries	1,582
Sunland Commercial	506
LAUSD Byrd High School	2,770
Community Recycling and Recovery	701
Bradley Landfill Recycling Center – Phase II Construction	5,738

Data from the Draft City of Sun Valley Athens Waste Facility Traffic Impact Study (Meyer, Mohaddes Associates, 2007).

3.2.7.2 Relationship to the General Plan

The Project also lies within the SVLTCCP Area of the City of Los Angeles. This Community Plan for the Sun Valley–La Tuna Canyon is part of the City of Los Angeles General Plan, adopted in 1999. The existing and proposed industrial use of the Project site is consistent with the SVLTCCP. Since the existing and permitted use of the Project site were known when the Community Plan was approved, it is assumed that , the emissions resulting from the Project are considered consistent with the emission increases forecasted from new development in this Community Plan.

In addition, The General Plan includes an Air Quality Element that was evaluated for consistency with the Project (City of Los Angeles, 1991). Specifically, the Project would be consistent with the Goal 5 policy, "Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling" (City of Los Angeles, 1991). The Project would divert MSW from landfills and improve recycling and would include installation of a 2-kW solar power system. The Project would be expected to result in a less than significant cumulative impact when evaluated against the Air Quality Element of the General Plan.

Diesel Particulate Matter

The Multiple Air Toxics Exposure Study III (MATES III) is a monitoring and evaluation study conducted in the South Coast Air Basin. This wide ranging and comprehensive air sampling program began in April 2004 and the Draft Final Report was issued in July 2008 (SCAQMD, 2008c). The MATES-III study concluded that the average excess cancer risk in the South Coast Air Basin was approximately 1,200 per million people. Based on the results of the MATES-III study, background cancer risks in the South Coast Air Basin are above the SCAQMD's significance criterion of 10 in a million. The MATES-III study also concluded

that mobile sources were the main contributors to risk and approximately 94 percent of the cancer risk was attributed to mobile sources (SCAQMD, 2008c). Since the background cancer risk is greater than the SCAQMD threshold, the incremental increase in DPM from the Project under 400-tpd baseline scenario would be expected to have a significant unavoidable cumulative impact to air quality. However, since diesel particulate matter emissions would be reduced under the 1,500-tpd baseline scenario, the cumulative impacts would be expected to be less than significant.

3.2.8 References

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3.3 Noise

3.3.1 Introduction

This section discusses the potential for noise impacts in the vicinity of the Project. Information to support this analysis was obtained from several sources, including information summarized from the Bradley Landfill and Recycling Center Transition Master Plan Draft Environmental Impact Report (Christopher A. Joseph & Associates, 2005).

3.3.1.1 General Background Information

Sources of stationary or transient noise can be characterized as unwanted sound that could disrupt normal activities or diminish the quality of the environment. Stationary sources are generally localized, while transient or mobile sources can occur irregularly. The noise generated combines with the ambient sounds to produce the local acoustical environment. An individual's response to noise can be quite varied depending on the noise source, the sensitivity of the receptor and the time of day in which it occurs.

Several noise measurement scales are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative loudness of a sound. The zero on the decibel scales is based on the lowest sound level that the healthy unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 dB represents a ten-fold increase in acoustic energy, while 20 dB is 100 times more intense, 30 dB is 1,000 times more intense, etc. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness over a fairly wide range of intensities. There are several methods of characterizing sound. The most common in California is the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive.

Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. This energy-equivalent sound/noise descriptor is called L_{eq}. The most common averaging period is hourly, but L_{eq} can describe any series of noise events of arbitrary duration.

Since the sensitivity to noise increases during the evening and at night (because excessive noise interferes with the ability to sleep), 24-hour descriptors have been developed that incorporate noise penalties added to quiet-time noise events. The Community Noise Equivalent Level (CNEL) is a measure of the cumulative noise exposure in a community, with a 5 dB penalty added to evening (7:00 p.m. to 10:00 p.m.) and a 10 dB addition to nocturnal (10:00 p.m. to 7:00 a.m.) noise levels.

Noise-sensitive receptors include residential areas, facilities such as schools and hospitals, and certain types of recreational uses where a quiet setting is considered to be an integral part of the recreational experience.

Representative outdoor and indoor noise levels in units of dBA are shown in **Table 3.3.1** For example, as shown in the table, a diesel pile driver has a noise level of 100 dBA at 100 feet from the source and has a "Very Loud" subjective impression.

TABLE 3.3-1
Typical Sound Levels Measured in the Environment and Industry

Outdoor Noise Levels (At a Given Distance From Noise Source)	dBA	Indoor Noise Levels	Subjective Impression
Jet Takeoff (200')	120		Pain Threshold
	110	Rock Music Concert	
Diesel Pile Driver (100')	100		Very Loud
Diesel Truck (50')	90	Boiler Room	
		Printing Press Plant	
Pneumatic Drill (50')	80		
Freeway (100')		In Kitchen with Garbage Disposal Running	
Vacuum Cleaner (10')	70		Moderately Loud
		Data Processing Center	
	60		
		Department Store	
Light Traffic (100')	50		
Large Transformer (200')			
	40	Private Business Office	Quiet
Soft Whisper (5')	30	Quiet Bedroom	
	20	Recording Studio	
	10		
	0		Threshold of Hearing

Source: U.S. Department of Housing and Urban Development, 1985.

Studies have shown that the smallest perceptible change in sound level is approximately 3 decibels. A change of at least 5 decibels would be noticeable and would likely evoke a negative community reaction. As stated above, a 10 dB increase is subjectively heard as approximately a doubling in loudness and would most certainly cause a negative community reaction. The City of Los Angeles has established thresholds for noise impacts based on these scales of audibility. These thresholds state that in areas where the existing noise environment is outside of acceptable ranges for the land uses located in those areas, the City uses the threshold of audibility (3 dBA) as the limit for determining an impact. In areas where the existing noise environment is within the acceptable range for the existing land use, the City uses the 5 dBA threshold, since this change would be clearly noticeable yet the resulting noise environment is still acceptable for the land uses located there. As such, in some cases the threshold of audibility can be exceeded without resulting in a significant noise impact, since the resulting noise environment would remain in the acceptable range. In the case of construction noise, the City permits greater latitude (up to 10 dBA increase for very short-term construction activities and up to 5 dBA for longer term construction activities) because this activity takes place during the day and is temporary in nature. The City's noise significance thresholds are discussed further in Section 3.3.4.2.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source will decrease by approximately 6 decibels over "hard" surfaces (such as concrete) for each doubling of distance. For example, if a noise source produces a noise level of 89 dBA at a reference of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the source, 77 dBA at a distance of 200 feet and so on. Noise will decrease by approximately 9 decibels over "soft" surfaces (such as vegetated areas or bare earth) for each doubling of distance.

3.3.2 Environmental Setting

3.3.2.1 Sensitive Receptors

Figure 3.3-1 depicts the location of noise sensitive receptors in the Project area. Sensitive receptors in the vicinity of the Project site include three residential areas: Residences 1 as shown on **Figure 3.3-1** located approximately 0.4 mile to the northeast of the Project site; Residences 2 located approximately 0.3 mile to the northeast; and Residences 3 located approximately 0.3 mile to the east of the Project site. Other sensitive receptors include Stonehurst Elementary School (located approximately 0.4 mile to the northeast of the Project site), and Stonehurst Recreational Center (located approximately 0.4 mile to the north of the site).

3.3.2.2 Existing Ambient Daytime Noise Levels and Offsite Roadway Noise Levels

The following discussion pertains to baseline conditions as they currently exist at the Project site.

Existing noise sources in the area surrounding the Project site include automobile and truck traffic on major arterials (Glenoaks Boulevard, Sunland Boulevard), as well as noise generated from surrounding industrial uses (Vulcan Inert Fill Pit). Burbank Airport is also located approximately 2 miles to the southeast of the Project area and existing noise from overhead air traffic is evident in the Project vicinity.

Existing background noise measurements were conducted on May 3 and 4, and June 1, 2007 at four measurement sites representing the sensitive receptor areas. Measurement equipment consisted of one Larson Davis (LD) Model 824 sound level meter, used for the 24-hour measurement, and one Bruel & Kjaer (B&K) Model 2236 sound level meter, utilized for the short-term measurements. The microphones used for the measurements were field-calibrated before and after each measurement to ensure the accuracy of the measurements. All the equipment complies with the requirements of the American National Standards Institute (ANSI) and the International Electrotechnical Commission (IEC) for precision sound level measurement instrumentation.

Weather conditions during the measurements consisted of clear skies, calm to slightly breezy wind conditions, and temperatures were near 65 degrees Fahrenheit (^{o}F) during the May short-term measurements and 75 to 80^{o}F during the June measurement.

Following are brief descriptions of the noise monitoring locations and the noise measurement data:

Site 1: This site is located at the corner of Dronfield Avenue and Art Street. It represents the Residences 1 receptor area. One 15-minute noise measurement was conducted at this location in the early afternoon of May 4, 2007. Noise sources during the measurement consisted of construction equipment, from a westerly direction, and local vehicular traffic, including trucks and school busses.

Site 2: This site represents the closest homes east of the Project site (Residences 2). The noise monitoring location is at the west end of Elinda Place. Noise measurements at this site were over a full 24-hour period, starting at 1:00 p.m. on May 3, 2007. **Figure 3.3-2** graphically depicts the hourly noise level data obtained at this location.

Site 3: This site is located at 10832 Roycroft Street, in the residential area east of Sunland Boulevard. It represents the Residences 3 receptor area. One 15-minute noise measurement was conducted at this location in the early afternoon of June 1, 2007. Vehicular traffic on Sunland Boulevard is the main contributor to the noise environment at this location.

Site 4: This site is located at the southwest corner of Stonehurst Recreation Center, at the end of Wicks Street. One 20-minute noise measurement was conducted at this location in the early afternoon of May 4, 2007. Noise from construction equipment was louder at this location relative to Site 2.

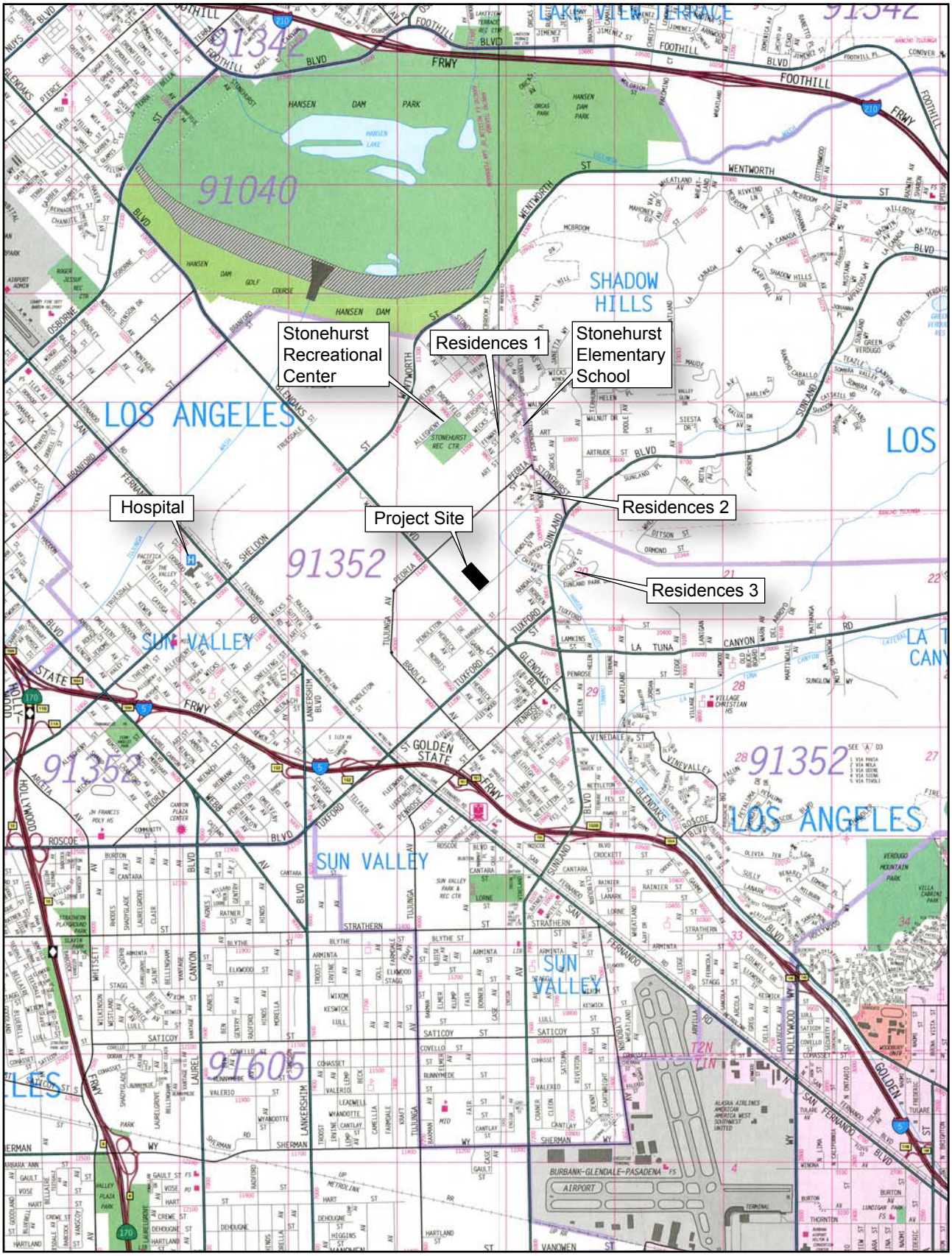

FIGURE 3.3-1
Sensitive Noise Receptors in the Project Area
Athens Sun Valley MRF

Source: Thomas Guide, Los Angeles and Orange Counties, 2003.

ES032007003SCO355351.01.01 S29CA_noise.ai 1/08

CH2MHILL

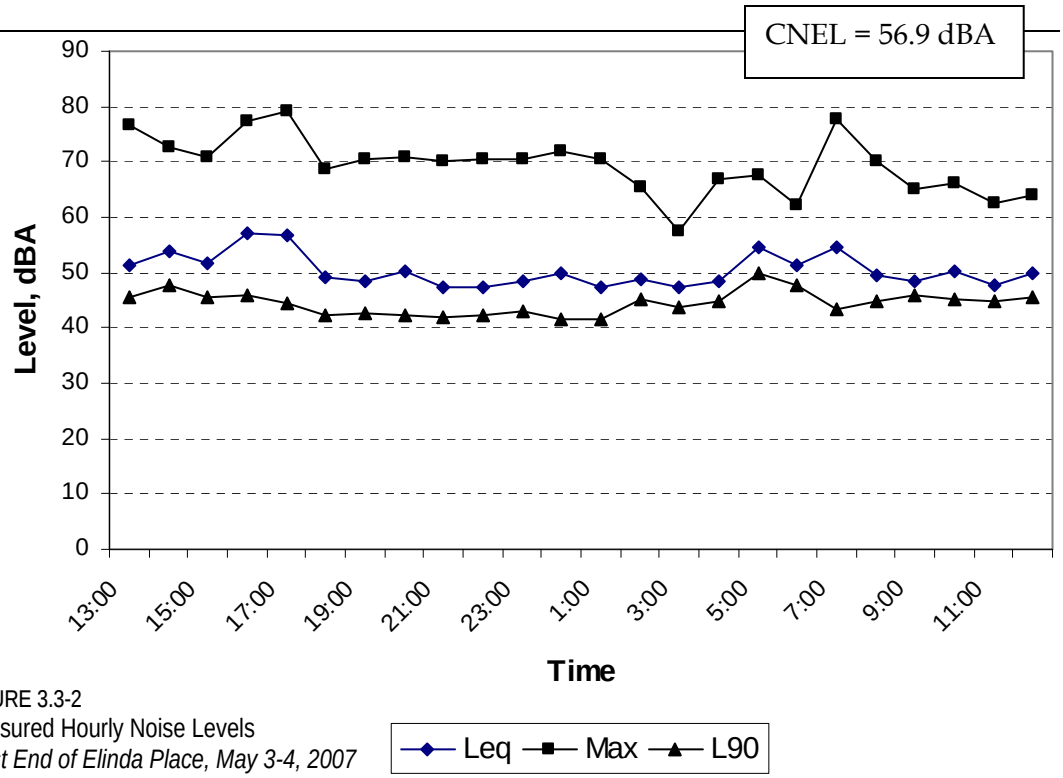

FIGURE 3.3-2
Measured Hourly Noise Levels
West End of Elinda Place, May 3-4, 2007

Table 3.3-2 summarizes the short-term noise level measurement data at Sites 2 through 4.

TABLE 3.3-2
Summary of Short-Term Background Noise Levels

Site	Measurement Start Time	Duration (mins)	L_{eq}	L_{min}	L_{max}	L_n		
						L_{10}	L_{50}	L_{90}
2	12:18 p.m.	15	56.3	42.5	75.3	55.5	51.5	45.0
3	12:57 p.m.	20	50.1	44.7	60.6	52.0	48.5	47.0
4	2:00 p.m.	15	54.3	45.8	72.1	57.1	49.0	46.5

Baseline conditions associated with the facility's existing entitlements (1,500 tpd of C&D materials processed outdoors) would likely result in increased noise levels due to increased truck traffic. Under this baseline, approximately three times more vehicles would access the site on a daily basis and additional onsite equipment would operate outdoors to process all materials received.

3.3.2.3 Existing Onsite Operations

The following discussion describes baseline conditions as they currently exist at the site.

In compliance with the current CUP, all operations at the existing facility currently occur outdoors. Noise from the existing Project site is attenuated by an 8-foot tall concrete block wall located on the Pendleton Street side of the Project site. In addition, three buildings and an 8-foot concrete block wall are on the southwest side of the site. Existing operations at the

facility utilize various types of equipment including conveyors, a trommel screen, and wood tub grinders.

On June 1, 2007, a number of noise level measurements of existing operations were conducted within the Project site. The measurements were focused on quantifying noise levels emanating from the tub grinders and the conveyor/trammel screen assembly and associated operations. The two tub grinders used at the site are in a three-sided, roofed semi-enclosure, and as such, noise levels from the open face of the structure are much louder than those behind the semi-enclosure. **Table 3.3-3** summarizes the results of the source noise measurements. The maximum noise levels at the Project site are due to the tub grinders and are 89 dBA at 50 feet.

TABLE 3.3-3
Measured Noise Levels from Existing Operations at the Project Site

Noise Source(s)	Distance (ft)	L_{max} (dBA)	L_{eq} (dBA)
Tub Grinders (in front of open face)	50	89	84
	100	78	73
Tub Grinders (behind the structure)	15	65	61
Conveyor/Trommel Screen	50	74	76-77[a]
	100	71	
Front-end Loader	50	80	

Note:

[a] (L_{eq} due to the combined operation of trucks, front-end loader, conveyor, and trammel screen)

Table 3.3.4 shows the mix of equipment currently used for existing operations and the mix necessary to process 1,500 tpd of C&D materials.

The measured noise level data from the project site (shown in **Table 3.3-3**) was augmented with typical noise levels generated by specific pieces of equipment taken from the USEPA document entitled "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances" were used as reference data to estimate current noise levels from existing Project operations. The number of equipment currently utilized at the site and those permitted were used to estimate noise levels from the existing and baseline operations, respectively. Conservatively assuming that all equipment is operating simultaneously, the noise levels associated with existing and permitted (baseline) operations were estimated at nearby receptors in terms of CNEL, and are summarized in **Table 3.3-5**.

3.3.3 Regulatory Setting

This discussion of the regulatory setting applies to both baseline conditions: (1) baseline conditions as they currently exist at the site, and (2) baseline conditions associated with the facility's existing entitlements (1,500 tpd of waste materials).

TABLE 3.3-4
Existing and Permitted Equipment Mix

Equipment Type	400-tpd Baseline	1,500-tpd Baseline
Mobile Equipment		
Loaders	3	4
Excavators	3	4
Forklifts	1	1
Sweeper	1	1
C&D Equipment		
Material Feed/Incline Conveyor	1	1
Trommel and transfer conveyor	1	1
C&D sorting conveyor	1	1
Tub Grinders	2	2
Dirt Screen	1	1

TABLE 3.3-5
Estimated Noise Levels from Existing and Baseline Operations

Site	Approximate Distance to Project Site (feet)	CNEL (dBA)	
		400-tpd Baseline	1,500-tpd Baseline
1	1900	53.5	54.1
2	2800	50.2	50.7
3	2800	50.2	50.7
4	1800	54.0	54.6

3.3.3.1 State Regulations

The California Department of Health Services has established guidelines regarding noise and land use compatibility. These guidelines are shown in **Figure 3.3-3**. For example, noise levels for single-family residential land uses are "normally acceptable" up to 60 dB L_{dn} or CNEL assuming that buildings are of normal conventional construction. Above 70 dB L_{dn} or CNEL, noise levels are "normally unacceptable" or "clearly unacceptable" for residential land uses. Refer to **Figure 3.3-3** for land use compatibility information for other sensitive receptors including schools and parks.

In addition, California requires each local government entity to perform noise studies and include a Noise Element as part of their General Plan. Relevant portions of the Noise Element of the Los Angeles City General Plan are discussed below.

3.3.3.2 Local Regulations

Los Angeles City General Plan Noise Element

The following information was drawn from the Noise Element of the Los Angeles City General Plan (City of Los Angeles, 1999) and provides an overview of the Element.

The General Plan includes goals, objectives, and policies that relate to noise management in the city. The "General Plan Guidelines" issued by the Governor's Office of Planning and Research (1990) advises that a General Plan should contain goals, objectives, policies, programs and implementation monitoring. Goals included in the General Plan include the goal to have a city where noise does not reduce the quality of urban life and the related objective to reduce or eliminate intrusive noise, especially relative to noise sensitive uses.

Implementation programs for policies in the Element include Land Use Development related programs such as requiring mitigation measures as appropriate in accordance with the California Environmental Quality Act and city procedures for a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses. Examples of mitigation measures are: requiring projects with noise generating components to have no openings in building walls that face sensitive uses; limiting the hours of operation of a noise generating use; requiring that potential noise impacts associated with project construction be minimized by such measures as designating haul routes, requiring less noisy equipment, enclosing or orienting noise equipment away from noise sensitive uses, imposing construction hours that are more restrictive than those set forth in the Los Angeles Municipal Code, requiring vehicle parking and deployment activities to be separated and buffered from sensitive uses; and determining impacts on noise sensitive uses, such as public school classrooms, by weighting the impact measurement to the potential interior noise level over the typical hours of use instead of using a 24-hour measurement. Another Land Use Development program identified is to use, as appropriate, the Guidelines for Noise Compatible Land Use or other measures that are acceptable to the city to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations.

The City of Los Angeles has numerous ordinances and enforcement practices that apply to intrusive noise and that guide new construction (discussed more below). The City comprehensive noise ordinance establishes sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, and hours of operation for certain activities (such as construction). Its ambient noise standards are consistent with current state and federal noise standards. They are correlated with land use zoning classifications in order to guide the measurement of intrusive noise that results in intermittent or extended impacts on a specific site. The intent is to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within the zones specified. The standards guide building construction and equipment installation, equipment maintenance and nuisance noise enforcement.

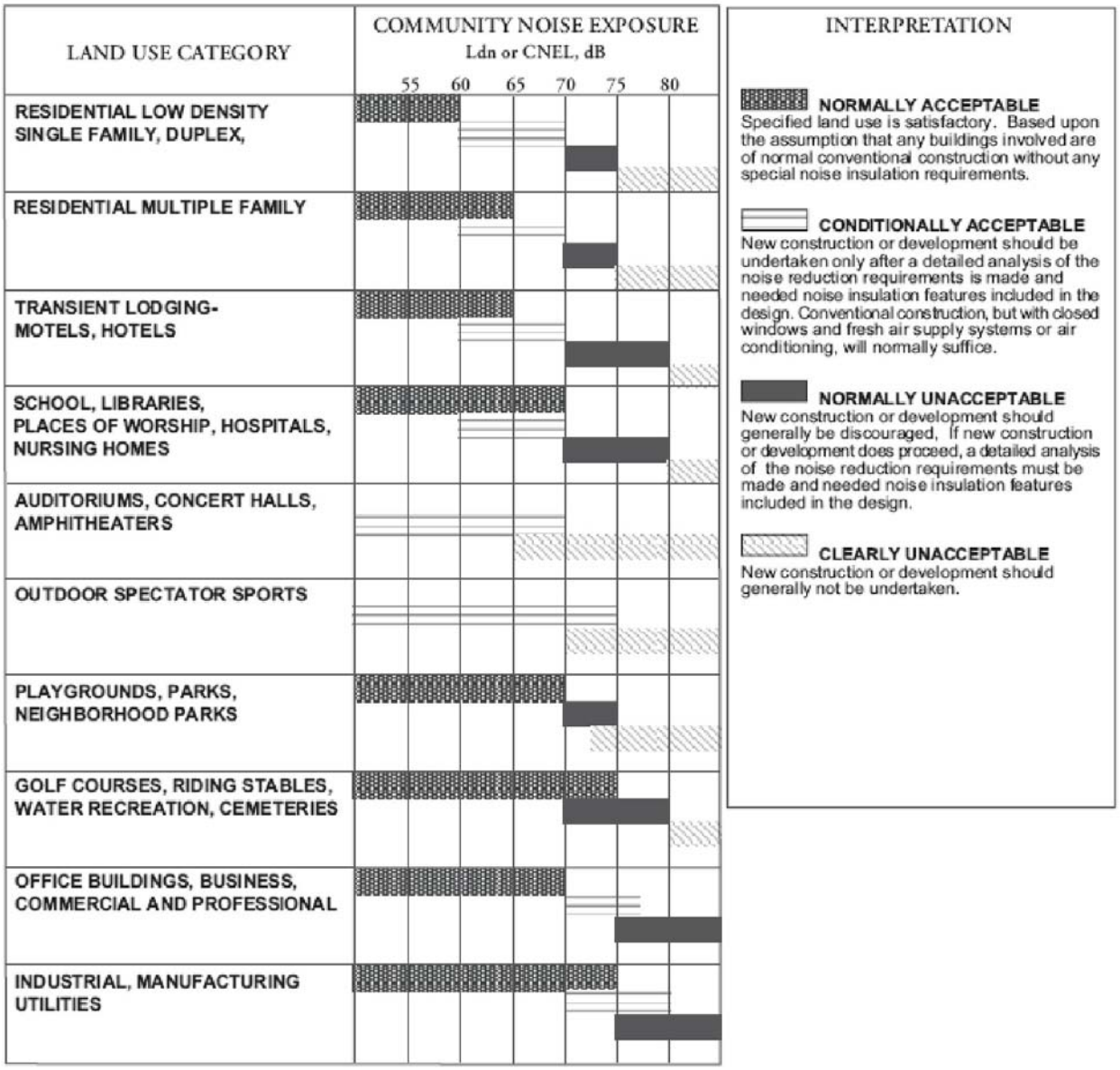

FIGURE 3.3-3
Noise/Land Use Compatibility Matrix
Athens Sun Valley MRF

Source: Guidelines for the Preparation and Content of the Noise Element of the General Plan, California Department of Health, in coordination with the office of Planning and Research.

The manufacturing (M zones) provisions of the code contain use specific requirements intended to reduce noise, odor and other impacts on adjacent uses. These include prohibiting certain commercial and industrial uses within specified distances of residential or less restrictive uses or zones, requiring increased setbacks from residential uses, limiting hours of operation, containing uses wholly within an enclosed building, requiring sound walls, prohibiting openings that face residential uses and prohibiting audibility of noise outside a facility. Conditional use and use variance permits allow the planning commission, zoning administrators and, on appeal, board of zoning appeals and city council to assess potential use impacts and impose conditions to mitigate noise impacts. Conditional use or use variance permits are required in certain zones for various uses including rubbish disposal projects. Depending on site specific situations, typical conditions include specific site design, setbacks, use limitations on all or parts of the site, walls and hours of operation so as to minimize noise impacts.

Occupants of buildings are protected from traffic noise and vehicle noise by a number of land use, building construction and noise mitigation measures. Trucks tend to generate greater noise than cars. Because trucks can travel on most streets and highways in Los Angeles, truck noise can impact all areas of the city. Areas especially impacted tend to be those that are located near industrial and warehouse sites. In some areas of the city where this is a problem, it is recommended in community plans that certain major highways within the community be designated as truck routes and that trucks be discouraged from using other streets. For this Project, the applicant has submitted a site plan that blocks the current access driveway on Peoria Street. This will restrict Project traffic to the Pendleton Street entrance and eliminate Project traffic through residential areas north of the site via Peoria Street.

City of Los Angeles Municipal Code

Section 41.40 of the City of Los Angeles Municipal Code (establishes when construction work is prohibited. The Municipal Code section states the following:

> *No person shall between the hours of 9:00 pm and 7:00 am of the following day perform any construction or repair work of any kind upon or any excavating for, any building or structure, where any of the foregoing entails the use of any power-driven drill, driven machine, excavator, or any other machine, tool, device, or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel, or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the jobsite delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this code.*

Section 112.04 of the City's Municipal Code regulates powered equipment for repetitive use in residential areas within residential zones or within 500 feet of a residence. This provision of the code does not apply to the project which is in an industrial zone and located over 1000 feet from the nearest residential use.

3.3.4 Impacts and Mitigation Measures

3.3.4.1 Significance Criteria

The City of Los Angeles has developed the *L.A. CEQA Thresholds Guide [City of Los Angeles, 2006]*to guide CEQA impact analyses for projects within the City's boundaries. In analyzing a project's potential impacts to noise, the *Thresholds Guide* states that the project shall be evaluated against the following significance criteria:

A project would normally have a significant impact on noise levels from construction during the *daytime* if:

> *Construction activities lasting more than 1 day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use; or if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.*

A project would normally have a significant impact on noise levels from construction during the *nighttime* if:

> *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 pm and 7:00 am Monday through Friday, before 8:00 am or after 6:00 pm on Saturday, or at any time on Sunday.*

The *Thresholds Guide* establishes the following significance criteria for operational noise:

> *A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase 3dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (**Table 3.3-6**).*

3.3.4.2 Methodology

The reference measurement data shown in **Table 3.3-2** and typical noise levels generated by specific pieces of equipment taken from the EPA document entitled "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances" were used as reference data to predict future noise levels from the Project operations.

For assessment of traffic noise levels due to truck traffic generated by the Project, average daily traffic (ADT) data for existing, baseline and future conditions were utilized in the FHWA Traffic Noise Model (TNM) version 2.5 to predict CNEL values due to each condition. To estimate the CNEL, the assumed day/evening/night split for overall non-Project traffic is 85 percent/8 percent/ 7 percent, meaning that 85 percent of daily traffic would occur during daytime (between 7 a.m. and 7 p.m.), 8 percent during the evening (7 to 10 p.m.), and the remainder between 10 p.m. and 7 a.m.

The predicted future noise levels from operations and traffic are compared to the existing and baseline noise levels in the context of applicable significance criteria to evaluate potential noise impacts. Existing and estimated future noise levels are shown in Appendix C.

TABLE 3.3-6
City of LA Noise Thresholds

Land Use	Community Noise Exposure CNEL, dB			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-family, Duplex, Mobile Homes	50-60	55-70	70-75	Above 75
Playgrounds, Neighborhood Parks	50-70	--	67-75	Above 72

Source: City of Los Angeles CEQA Thresholds Guide [City of Los Angeles, 2006]

Notes:

Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable – New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

Impact NOI-1: Construction Noise (Less than Significant)

Construction of the MRF would involve the use of various types of construction equipment. Noise levels would fluctuate depending on the construction phase, equipment type, duration of use, distance to sensitive receptors and the absence or presence of barriers between the Project site and the receptor location.

Reference noise level measurements for individual pieces of construction equipment are shown in **Table 3.3-7**.

To evaluate noise levels from construction of the Project, the mix of equipment to be utilized during the construction phase was obtained from the applicant. Table 3.3-7 **summarizes the list of construction equipment and their associated maximum noise levels at a reference distance of 50 feet from the equipment (from the USEPA document).**

This information was used in conjunction with distances from the Project site to the nearest noise receptors to calculate CNEL values due to construction activities. It is assumed that construction would occur for 8 hours per day during daytime hours. It is also assumed that baseline Project activities will continue while construction occurs. **Table 3.3-8** shows a summary of the calculated construction CNEL values and combines them with the baseline noise levels.

When added to an existing ambient noise level of approximately 57 dBA CNEL (as measured at Site 1), the combined Project operations (including traffic) and construction would result in 2.5 dBA increase in CNEL values compared to existing conditions. Such effects would be below the applicable City of LA CEQA significance threshold of 5 dBA for operations or construction.

Table 3.3-7
Project Construction Equipment Noise Levels

Equipment Type	# / Day	L_{max} at 50 Feet
Air Compressors Composite	1	82
Generator Sets Composite	1	76
Cement and Mortar Mixers Composite	1	80
Concrete/Industrial Saws Composite	1	85
Tractors/Loaders/Backhoes Composite	2	80
Graders Composite	1	83
Off-Highway Trucks Composite	1	84
Rollers Composite	1	80
Pavers Composite	1	89
Forklifts Composite	1	75
Sweepers/Scrubbers Composite	1	85

TABLE 3.3-8
Combined Project Construction and Operations Noise Levels

Site	Approximate Distance to Project Site (feet)	CNEL (dBA)		
		Construction Noise	Baseline Operations Noise	Combined Operation & Construction
1	1,900	51.0	54.1	55.8
2	2,800	47.6	50.7	52.4
3	2,800	47.6	50.7	46.2
4	1,800	51.4	54.6	50.1

Mitigation Measures. The following mitigation measures shall be employed during the construction phase of the Project:

- Construction contracts shall specify that all equipment must be equipped with mufflers and other applicable noise attenuation devices.
- Construction shall be restricted to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. Saturday, and prohibited at anytime on Sunday or a Federal holiday.

Residual Impacts. The temporary nature of this impact and the application of the above mitigation measures will reduce this impact to a less than significant level.

Impact NOI-2: Project Noise (Less than Significant)

Table 3.3-9 shows the mix of equipment currently used for existing operations and the mix necessary to support baseline operations for 1,500 tpd and the Project mix of equipment to process 500 tpd of C&D materials and 500 tpd of MSW.

The reference measurement data shown in **Table 3.3-1** and typical noise levels generated by specific pieces of equipment taken from the USEPA document entitled "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances" were used as reference data to estimate noise levels from existing, baseline, and Project operations. The number of equipment proposed to be utilized at the site were used to estimate noise levels from future operations. Conservatively assuming that all equipment is operating simultaneously, the noise levels associated with the proposed operations were estimated at nearby receptors in terms of CNEL. **Table 3.3-10** summarizes and compares the future operational noise levels from the Project site to existing and baseline noise levels.

As shown in **Table 3.3-10**, Project noise is slightly higher than ambient noise with the 400-tpd C&D baseline. However, please note that the results in this table assume that the two tub grinders used for C&D operations are located outdoors (as occurs under existing conditions). A subsequent decision to locate the tub grinders inside the C&D building will result in less of an increase over existing noise levels. Even with the tub grinders outside, the modeling results show that estimated noise increases are less than 3 dBA and would therefore be inaudible at any receptor location. Estimated noise with the Project, is slightly less than the 1,500-C&D baseline at all receptor locations. Accordingly, the Project's impact is not significant using this baseline as the basis for measurement.

Mitigation Measures. Mitigation measures are not required**.**

Residual Impact. Impacts at these receptor locations are less than significant.

Impact NOI-3: Traffic Noise (Less than Significant)

Existing and forecast future ADT data were used in the FHWA TNM to estimate the Project traffic noise effects along the immediate roadway network. Although the land uses along the roadways leading to the Project site are predominantly commercial and industrial, this analysis was performed to provide a perspective of potential changes to traffic noise levels due to the Project. **Table 3.3-11** shows a summary of existing and projected ADT along roadways that are utilized by trucks arriving at and leaving the Project site.

Based on the TNM calculations at a fixed distance of 100 feet from each roadway segment, the Project would result in a slight increase of 0.2 dBA in CNEL at such distance relative to the existing scenario. Conversely, traffic noise levels under the Project would decrease by 0.1 dBA CNEL relative to baseline conditions. These differences in traffic noise levels would not be detectable to people residing in areas near roadways traveled by Project traffic. Similarly, at greater distances to roadways, traffic generated by the Project would not have a discernable effect on noise levels.

Mitigation Measures: No mitigation measures are necessary**.**

Residual Impact: Less than Significant**.**

TABLE 3.3-9
Project Equipment Mix

Equipment Type	400-tpd Baseline	1,500-tpd Baseline	1,500 tpd Project (1,000 MSW, 500 CD)*
Mobile Equipment			
Loaders	3	4	4
Excavators	3	4	4
Forklifts	1	1	2
Sweeper	1	1	1
C&D Equipment			
Material Feed/Incline Conveyor	1	1	1
Trommel and transfer conveyor	1	1	1
C&D sorting conveyor	1	1	1
Tub Grinders	2	2	2
Dirt Screen	1	1	1
MRF Equipment			
Infeed and Infeed Conveyor	0	0	1
Screened Material infeed and incline conveyor	0	0	1
Presort Conveyor	0	0	1
Sorting Conveyors	0	0	2
Baler Infeed conveyor	0	0	1
Baler	0	0	1
Screens	0	0	3
Transfer Conveyors	0	0	4

TABLE 3.3-10
Comparison of Project Noise Levels to Existing and Baseline Noise Levels

Site	Approximate Distance to Project Site (feet)	CNEL (dBA) 400-tpd Baseline	CNEL (dBA) 1,500-tpd Baseline	CNEL (dBA) 1,500-tpd Project (1,000 MSW, 500 C&D)
1	1900	53.5	54.1	53.9
2	2800	50.2	50.7	50.6
3	2800	50.2	50.7	50.6
4	1800	54.0	54.6	54.4

TABLE 3.3-11
Existing (2007) and Projected Average Daily Traffic

Roadway Segment	Existing ADT	Cumulative Project ADT	Average Daily Trips (ADT) Project	Average Daily Trips (ADT) 1,500-tpd Baseline
San Fernando Road n/o Sheldon St	13,600	2,300	110	180
San Fernando Road s/o Sheldon St	13,600	0	0	0
Sheldon Street b/w Laurel Canyon Blvd and San Fernando	N/A	600	20	50
Sheldon Street e/o San Fernando Road	16,100	2,900	110	220
Glenoaks Boulevard b/w Sheldon and Peoria St	12,300	2,900	110	220
Glenoaks Boulevard b/w Peoria and Pendleton St	N/A	3000	110	230
Glenoaks Boulevard s/o Penrose St	11,800	2,600	100	200
Peoria Street w/o Glenoaks Blvd	1,000	0	0	0
Peoria Street b/w Glenoaks and Stonehurst Ave	N/A	200	10	10
Tuxford Street b/w Lankershim and San Fernando	N/A	600	20	50
Tuxford Street b/w Bradley and Glenoaks	9,600	5,700	210	440
Tuxford Street b/w Glenoaks and Sunland Blvd	N/A	300	10	20
Penrose Street b/w San Fernando and Glenoaks	4,100	2,300	90	180
Bradley Avenue n/o Tuxford St	1,200	0	0	0

N/A – No current ADT data available.

3.3.5 Cumulative Impacts

3.3.5.1 Relationship to Related Projects

If noise from the construction of the Project overlaps with noise from the construction of the related Projects, the potential noise impact from construction may be cumulatively considerable. However, such effects would be temporary and limited to the time period when high noise-generating activity overlaps on two or more projects located in proximity to one another.

Cumulative impacts from the Project differ in terms of what baseline is used to assess the impact. With the 1,500-tpd C&D baseline, the Project will result in less noise at the Project site than under baseline conditions. Accordingly, the Project will not have an incremental contribution to noise problems in the Sun Valley area. As indicated in Section 15130(a)(1) of the *CEQA Guidelines,* which establishes guidelines for the assessment of cumulative impacts, "An EIR should not discuss impacts which do not result in part from the Project evaluated in the EIR." Because the Project will not result in an incremental impact to noise, it would not contribute to any cumulatively considerable noise impacts in areas served by the project.

When compared to the 400-tpd C&D baseline, the Project will have an incremental contribution to noise levels in the vicinity of the Project site. Cumulative impacts would occur to the extent that noise levels increase to an "unacceptable level" as a result of traffic noise increases on major arterials in the vicinity of the Project site. Noise modeling conducted for the Draft EIR for the *Bradley Landfill and Recycling Center Transition Master Plan* shows that the maximum anticipated noise increase resulting from cumulative projects would be 1.4 dBA on San Fernando Road between Tuxford Street and Sheldon Street. Since the minimum audible noise increase is 3 dBA, this Draft EIR concludes that noise impacts are not cumulatively considerable. Since the Athens Project generates approximately one fourth the number of truck trips as the Bradley project and since, in general, traffic volumes on major arterials must double to result in an audible increase (3 dBA) in noise, it is unlikely that the development of the project and other related projects would generate an audible increase in noise levels (3 dBA).

3.3.5.2 Relationship to Projections/Plans

The Sun Valley–La Tuna Canyon Community Plan has several goals objectives and policies related to noise. For non-airport noise the objective is to reduce or eliminate non-airport related intrusive noise, especially relative to sensitive receptors. The major noise policy is to enforce or implement applicable city, state and federal regulations intended to mitigate noise producing activities, to reduce intrusive noise and alleviate noise considered a public nuisance (Page 3-1). The plan notes the role of building permit approvals requiring conformance with the California Noise Insulation Standards, the CEQA process and enforcement of the Noise Ordinance as key tools in limiting non-airport noise (Page 4-2). The plan also calls for the design of projects to minimize potential impacts on noise sensitive uses and to maintain or reduce existing ambient noise levels (Pages 4-3 and 4-4). This Project's design, which moves waste recovery and transfer operations indoors is consistent with this policy. Accordingly, the Project does not contribute to cumulatively considerable noise impacts in the Project area.

3.3.6 References

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3.4 Population and Housing

3.4.1 Introduction

This section discusses the potential impacts of the Project on population and housing near the Project site. Information to support this analysis was obtained from several sources including the U.S. Bureau of Census, City of Los Angeles, and the Southern California Association of Governments.

3.4.2 Population Setting

The Project site is located within the City of Los Angeles' Sun Valley—La Tuna Canyon Community Plan (SVLTCCP) area, which covers approximately 20.09 square miles in the City's north valley. In 2000, the total population of the SVLTCCP area was 86,391 (City of Los Angeles, 2007a). These figures from 2000 represent an approximately 11 percent increase in population from the 1990 census population count. The Los Angeles Department of City Planning has prepared 2005 population estimates for the SVLTCCP area that show continued growth in total population from 86,391 to 91,579, which is approximately a 5.7 percent population increase over this 5-year period (City of Los Angeles, 2007a).

The population totals for the SVLTCCP area are based on U.S. Census Bureau data for 20 individual census tracts. The Project is located in Census Tract 1211. This triangle-shaped tract is bordered on the west by San Fernando Road, on the east by Stonehurst Avenue and Sunland Boulevard, and on the north by Branford Street and the Hansen Dam Park. Between 1990 and 2000, census data for this tract show that the percentage of the total population that identified itself as Hispanic or Latino increased from 47.2 percent to 59.6 percent. Over this same timeframe, the percent of the population that identified itself as White dropped from 42.4 percent 29.5 percent. The total population in Census Tract 1211 grew from 4, 018 to 4,315 people between the 1990 and 2000 census. Because the 1990 census did not give people the opportunity to indicate racial identities in the same manner as the 2000 census, these changes in ethnicity may not be entirely representative of the changes that occurred in this census tract between 1990 and 2000. Other ethnicities that made up small percentages of the population of this census tract in 1990 and 2000 include Asian, African American, American Indian, and Native Hawaiian (U.S. Census Bureau, 2000a).

Each of the U.S. Census Bureau's census tracts are composed of a number of smaller block groups. In 2000, Census Tract 1211 included four block groups; the Project site is located in Block Group 2.[1] Within Block Group 2, the percent of the population that identified itself as Hispanic or Latino dropped from 14.8 percent in the 1990 census to 11.6 percent in the 2000 census. The percent of the total population of Block Group 2 that identified itself as White grew from 81.7 percent in the 1990 census to 82.2 percent in the 2000 census (U.S. Census Bureau, 2000g) (U.S. Census Bureau, 1990b and 1990c).

Median income for all households in Census Tract 1211 in 1999 was $47,227; median income for family households was $46,094. Among family households, married-couple households,

[1] In the 1990 census, Census Tract 1211 was divided into five block groups. However, Block Group 2, which contains the project site, had the same boundaries in both the 1990 and 2000 census efforts. Census Tract 1211, which encompasses Block Group 2, also had the same boundaries in both census efforts.

which comprised 53.6 percent of total households, had a median income of $49,514. Households headed by single females, which comprised 13.9 percent of total households, had a median income of $28,750. Non-family households comprised 24.5 percent of all households and had a median income of $32,250 (U.S. Census Bureau, 2000a and 2000m). The U.S. Census Bureau identified 937 residents of Census Tract 1211, approximately 22 percent of the sample population, as having income below poverty level (U.S. Census Bureau, 2000j).[2]

In Block Group 2, median income during 1999 for all households, including family households, was $50,625 (U.S. Census Bureau, 2000h and 2000i).[3] Within Block Group 2, 51 residents or 8.5 percent of the sample population had a 1999 income below poverty level (U.S. Census Bureau, 2000j).

3.4.3 Housing Setting

Within the SVLTCCP area, the 2000 census identified 22,505 occupied housing units. Included in this total were 13,784 single-family housing units, 8,418 multiple-family housing units, and 8,721 nonsingle-family housing units (City of Los Angeles, 2007a).[4] With 1,284 housing units identified within Census Tract 1211 during the 2000 census, housing within the tract makes up approximately 5.5 percent of the community plan area total. Of this total, 851 units, or 66 percent, were owner-occupied, while 376 units (29 percent) were renter-occupied; the remaining units were vacant at the time of census (U.S. Census Bureau, 2000a).

Housing stock within Census Tract 1211 is older than in the general community plan area. The 2000 census reports that 47.8 percent of all occupied housing units in the census tract were constructed between 1940 and 1959. Less than 5 percent of all units were built between 1990 and 2000.

According to the 2000 census, the median value for owner-occupied units was $155,000, with 68.8 percent of these units valued between $100,000 and $199,000. A review of 2000 data for monthly owner costs as a percentage of income suggests varying affordability: 31.9 percent of owners spent less than 15 percent of income on housing costs, but 26.6 of owners spent 35 percent or more of income on housing costs. Among renters, 54.4 percent of those included in the sample reported that gross rent was 35 percent or more of their household income, while 34.6 percent reported gross rent was 24 percent or less of their household income (U.S. Census Bureau, 2000b).

[2]The U.S. Census Bureau web site, http://www.census.gov/hhes/www/poverty/povdef.html, further describes how poverty is measured.

[3]Information regarding income distribution of households and families is not available from the U.S. Bureau of Census at the block group level.

[4]Single-family housing units only include detached dwellings, while multiple-family housing units include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units. Nonsingle-family housing units add mobile homes, boats, and other living quarters to multiple-family units. The sum of nonsingle-family housing units and single-family housing units yields all living quarters for residents of the census tract (Los Angeles Department of City Planning, 2007a).

Review of the data for the smaller Block Group 2 shows that there were 264 occupied housing units identified, with owners occupying 217 of these units and renters occupying the remaining 47 units (U.S. Census Bureau, 2000k). Housing is also older in Block Group 2, with 29 percent of homes built in 1939 or earlier, and 68.9 percent of homes built between 1940 and 1970. The remaining houses, totaling five units, were constructed between 1990 and 1994 (U.S. Census Bureau, 2000k). The median value for owner-occupied housing units was $198,400, with approximately 84 percent of home values distributed between $125,000 and $399,999 (U.S. Census Bureau, 2000d). Homeowners without mortgages spent less than 19 percent of income on monthly housing costs, while most mortgage holders spent less than 29 percent of income on housing costs. However, of mortgage holders, 30.8 percent had monthly owner costs that exceeded 40 percent of income (U.S. Census Bureau, 2000e). For renters, gross rent accounted for 29 percent or less of income for 61.6 percent of renters (U.S. Census Bureau, 2000c).

Tables 3.4-1 and 3.4-2 summarize primary population and housing characteristics for Census Tract 1211 and Block Group 2 for the decennial census years 1990 and 2000.

TABLE 3.4-1
Population and Housing Characteristics
Census Tract 1211

	1990[a]	2000[b]	Percent Change
Total Population	4,018	4,315	6.9
Total Households	1,194	1,227	2.7
Family Households	890	926	3.9
Average Household Size	3.32	3.49	4.9
Owner-occupied Housing Units	848	851	0.4
Renter-occupied Housing Units	346	376	8.0

[a] Source: U.S. Census Bureau, 1990a. *Table DP-1, General Population and Housing Characteristics: 1990.* Census Tract 1211, Los Angeles County, California. Accessed February 5, 2007: http://factfinder.census.gov

[b] Source: U.S. Census Bureau, 2000a. *Table DP-1, Profile of General Demographic Characteristics: 2000.* Census Tract 1211, Los Angeles County, California. Accessed February 5, 2007: http://factfinder.census.gov

3.4.4 Impacts and Mitigation Measures

3.4.4.1 Methodology

In accordance with the City's CEQA significance criteria for population and housing, this analysis evaluates the extent to which the Project would cause growth, accelerate growth, induce growth, or add unplanned infrastructure to the network of facilities and services available within the City.

TABLE 3.4-2
Population and Housing Characteristics
Block Group 2, Census Tract 1211

	1990[a,b]	2000[c,d]	Percent Change
Total Population	623[a]	660[c]	5.6
Total Households	236[a]	264[d]	10.6
Family Households	176[a]	178[d]	1.1
Average Household Size	2.64[b]	2.48[d]	-6.5
Owner-occupied Housing Units	209[b]	217[d]	3.7
Renter-occupied Housing Units	27[b]	47[d]	45.6

[a] Source: U.S. Census Bureau, 1990a. *Table DP-1, General Population and Housing Characteristics: 1990.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

[b] Source: U.S. Census Bureau, 1990d. *Table Qt-H1, Occupancy, Tenure and Age of Householder: 1990.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

[c] Source: U.S. Census Bureau, 2000f. *Table P1, Total Population: 2000.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

[d] Source: U.S. Census Bureau, 2000l. *Table QT-H3, Household Population and Household Type by Tenure: 2000.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

3.4.4.2 Significance Criteria

The City of Los Angeles has developed the *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles* (Thresholds Guide) to guide CEQA impact analyses for projects within the City's boundaries (City of Los Angeles, 2006). In analyzing a project's potential impacts on population and housing, the Thresholds Guide states that the project would be evaluated against the following significance criteria:

1. The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment.
2. The determination of whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted community plan or general plan.
3. The extent to which growth would occur without implementation of the project.

Impact POP-1: Project Contribution to Housing Growth (Less than Significant Impact)

Currently, approximately 32 people are employed at the Project site. With the 1,500 tpd baseline, the Project would provide approximately 62 permanent jobs. With the Project (1,000-tpd MSW and 500-tpd C&D), there would be approximately 65 jobs.

The SVLTCCP anticipates 13 percent population growth between the year 2000 and 2010. The Community Plan anticipates approximately 16 percent growth in the number of dwelling units over the same time period. Even if each job generated at the Project site

results in the demand for one new housing unit in the Community Plan area, the Project would result in at most 0.7 percent of the anticipated 2000 to 2010 housing growth in the area. Regardless of which baseline is used to measure the significance of the Project impacts, the potential housing and population demand generated by Project-related employment would result in minimal (if any) increase in the population in the community plan area.

From a growth-inducement perspective (Section 5), the Project is not anticipated to accelerate growth in the Community Plan area or in the immediate vicinity of the Project site. The jobs created by the Project are likely to be taken by participants in the current labor force. This Project will not generate enough employment or a specialized type of employment that would attract people from outside the local labor force. This type of land use supports growth and development by providing a means to increase recycling and sustainable development, but it does not cause or stimulate growth.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Impact POP-2: Inducing Growth Near the Project Site or in the City (Less than Significant Impact)

The Project is a SWT station or material recovery facility that would process 1,000 tpd of MSW and 500 tpd of C&D materials. This type of facility is unlikely to induce significant population or housing growth near the Project site because the Project itself will create very few new jobs (see Impact POP-1). The Project, therefore, will generate little or no demand for new housing.

From a citywide or regional perspective, the Project is also unlikely to induce growth. Although the Project would increase the capacity of available diversion facilities to meet diversion requirements of AB 939, it would also conserve capacity in existing landfills and incrementally reduce the need to increase disposal capacity. According to the Bureau of Sanitation staff, the City's overall solid waste stream is growing at an annual rate of about 2 percent and the City lacks the diversion facilities needed to meet the 50 percent diversion requirement of AB 939 and the City's 70 percent diversion goal. Hypothetically, any infrastructure project that provides more capacity than need to serve demand may be considered growth inducing However, because the City needs additional diversion capacity to meet the 70% diversion goal, the facility is not considered growth inducing.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

Cumulative Impacts

Relationship to Related Projects. As indicated in the above discussion of Project impacts, implementation of the Project will result in minimal, if any, increase in population or housing in the vicinity of the Project site. Accordingly, the Project will have a negligible effect on population or housing growth in the Sun Valley area. As indicated in Section 15130(a)(1) of the *CEQA Guidelines*, which establishes guidelines for the assessment of cumulative impacts, "An EIR should not discuss impacts which do not result in part from the Project evaluated in the EIR." Because the Project will not result in a measurable impact

on population and housing growth, it would not contribute to any cumulatively considerable impacts related to these impact assessment categories.

Relationship to Projections/Plans. Impact POP-1 includes a discussion of Project-related population and housing growth in relation to the projected population and levels in the SVLTCCP. Irrespective of what baseline is used to assess impacts, the Project will result in minimal (if any) population or housing growth and therefore the Project will not contribute to any growth-related cumulative impact.

3.4.5 References

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U.S. Census Bureau. 1990d. *Table QT-H1, Occupancy, Tenure and Age of Householder: 1990.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000a. *Table DP-1, Profile of General Demographic Characteristics: 2000.* Census Tract 1211, Los Angeles County, California. Accessed February 5, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000b. *Table DP-4, Profile of Selected Housing Characteristics: 2000.* Census Tract 1211, Los Angeles County, California. Accessed February 5, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000c. *Table H69, Gross Rent as a Percentage of Household Income in 1999.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000d. *Table H74, Value for Specified Owner-Occupied Housing Units.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000e. *Table H94, Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in 1999.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000f. *Table P1, Total Population.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000g. *Table P7, Hispanic or Latino by Race.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

U.S. Census Bureau. 2000h. *Table P53, Median Household Income in 1999.* Block Group 2, Census Tract 1211, Los Angeles County, California. Accessed February 7, 2007: http://factfinder.census.gov

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3.5 Surface Drainage and Hydrology

3.5.1 Introduction

This section discusses the Project's potential effect on the volume and quality of surface water runoff generated at the Project site. Please note that other water quality impacts (e.g., flooding, liquefaction, groundwater, etc.) are not considered potentially significant for reasons indicated in Section 3.7 of this document.

3.5.2 Regulatory Setting

This regulatory section applies to both baselines.

3.5.2.1 Federal Water Pollution Control Act

The Federal Clean Water Act (CWA) (33 U.S.C. 1251 *et seq.*) establishes water quality standards, criteria, and policies to maintain the beneficial uses of water. In 1990, the EPA promulgated final Phase I regulations implementing the NPDES pursuant to the CWA. The Phase I program included stormwater regulations for construction sites larger than 5 acres. The recently enacted Phase II regulations expand the existing NPDES stormwater program to address discharges from construction sites, such as this one, which disturb areas between 1 and 5 acres.

3.5.2.2 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code, Division 7) establishes the state's regulatory program to protect water quality. This legislation created the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) to plan, implement, manage, and enforce water quality regulations.

In California, the NPDES permitting program is administered by the SWRCB. For nonpoint source discharges (such as surface runoff), the NPDES program establishes requirements to protect water quality during construction and operation of a Project. To comply with NPDES, regulated uses must submit Stormwater Pollution Prevention Plans (SWPPPs) for both construction and operations. SWPPPs for Project operations must include a regular stormwater monitoring program and the implementation of both structural and nonstructural best management practices (BMPs) to reduce pollutant loadings.

3.5.2.3 City of Los Angeles, Ordinance 173, 494

The City has adopted this ordinance, which incorporates standards from the Los Angeles RWQCB Standard Urban Storm Water Mitigation Plan (SUSWMP). This ordinance requires the implementation of BMPs, which reduce pollutant loadings from construction activities to the extent practicable.

3.5.3 Environmental Setting

This environmental setting section applies to both the 400-tpd and 1,500-tpd baselines.

The Project site is located within the San Fernando Valley, an elliptical-shaped alluvium basin approximately 23 miles long and 12 miles wide. The Valley is part of the Los Angeles

River Area water basin. Within the Valley, the Project site is located in what is called the Hansen sub area, bounded on the north by the crest of the Hansen Dam, on the west by the Pacoima Hills, and on the southwest by the Verdugo Fault. The easterly boundary is formed by the topographic-drainage divide in the Verdugo Mountains that includes all tributary drainage below the La Tuna Canyon Debris Dam. The Hansen sub-area contains a total of 6,720 acres of which approximately half consists of hills and mountains traversed by streets and storm drains (Christopher A. Joseph & Associates, 2005).

The Sun Valley area, the valley in which the Project is located, drains to the Los Angeles River. Stormwater in this area flows in accordance with topography in a southerly direction. Stormwater is primarily conveyed by gravity on street surfaces with flat slopes (Christopher A. Joseph & Associates, 2005). As a result, light rainfall leads to moderate to severe flooding. Near the Project site, rainfall may cause flooding of Sheldon Street, Tuxford Street, Glenoaks Boulevard, and other nearby arterials (County of Los Angeles, 2004).

The size of the Project site is approximately 4.9 acres and almost entirely paved except for landscaping along the Pendleton Street entrance and the northern side of the Project site. The site is generally flat with a slight grade to the entrance along Pendleton Street. Under wet weather conditions, surface runoff currently flows in this direction and is collected in a floor drain that runs across the entrance way. The floor drain delivers surface runoff to a 300-gallon catch basin at the low point of the site. From this basin, two sump pumps transfer stormwater through a 1,500-gallon, three-stage clarifier (oil and water separator) for the first 30 minutes of any storm event. A time-delay device attached to the sump pumps ensures that the pumps are not turned back on for at least 12 hours in the event of intermittent rain. After the first 30 minutes of a storm event, the catch basin overflows and surface runoff flows by gravity to Pendleton Street. Wastewater that is generated at the Project site is regulated under Industrial Waste Permit W-499820, issued by the City of Los Angeles, Bureau of Sanitation, Industrial Waste Management Division.

3.5.4 Impacts and Mitigation Measures

3.5.4.1 Methodology

This section of the document assesses the surface water impacts of the Project, in terms of the volume and quality runoff generated at the Project site by comparison to the volume and quality and runoff generated under existing conditions.

3.5.4.2 Significance Criteria

The City of Los Angeles has developed the *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles* (*Thresholds Guide*) to guide CEQA impact analyses for Projects within the City's boundaries (City of Los Angeles, 2006).In analyzing a project's potential impacts to surface water and hydrology, the *Thresholds Guide* states that the project shall be evaluated against the following significance criteria:

- A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated.
- Expand the area affected by contaminants.

Appendix G of the *California CEQA Guidelines* states that a project would have a significant impact if it violates water quality standards or discharge requirements.

Impact WAT-1: Construction Impact (Less than Significant)

Regardless of what baseline is used to assess impacts, the construction of the Project will necessarily involve the use of materials that could adversely affect surface water quality unless proactively controlled. Cleaning agents, plumbing, painting, masonry materials, floor, and wall coverings are all typically used during construction. Construction also involves the generation of waste materials (debris) that could also be the source of an adverse surface runoff impact. Grading for the Project can also result in the exposure of soil particles that are considered pollutants when discharged to the storm drainage system.

Construction projects involving more than 1 acre must obtain a General Construction Activity Storm Water Permit, prior to construction, from the State Water Resources Control Board (SWRCB). Under current NPDES requirements, the applicant will be required to file a Notice of Intent (NOI) with the SWRCB. This NOI obligates the applicant to implement the conditions outlined in the General Permit including the preparation of a Construction SWPPP. The SWPPP identifies which Best Management Practices (BMPs) will be implemented including sand bag barriers, dust control, the clean up of leaks, using dry cleanup measures wherever possible, conducting major vehicle/equipment repairs offsite, the use of rumble strips to limit the tracking of sediment on the street, and other standard good housekeeping measures. As appropriate, the construction SWPPP will also specify the need for berms, sandbags, and other containment measures to limit stormwater pollution and runoff from onsite materials. The implementation of these types of BMPs will reduce surface water construction impacts to a less than significant level.

Mitigation Measures: Compliance with NPDES, as described above, will reduce impacts to a less than significant level.

Residual Impact: Impacts would be less than significant.

Impact WAT-2: Effect of Project on Amount of Surface Water Generated (Less than Significant Impact)

The volume of surface water generated at project sites is largely a function of the amount of impermeable surface at the site. The site is now almost entirely paved. Under baseline conditions (both baselines) and with the Project, there will be no increase in the amount of impermeable surface and hence no increase in the volume of surface runoff generated during wet weather conditions. The topographic pattern at the site will also be largely unchanged; hence, changes in the velocity or direction of surface flows are not anticipated in conjunction with the Project.

Mitigation Measures: Compliance with NPDES, as described above, will reduce impacts to a less than significant level.

Residual Impact: Impacts would be less than significant.

Impact WAT-3: Impact on Stormwater Runoff Quality (Less than Significant Impact)

Both baselines involve outdoor operations where contact water is formed by rainfall into the piles of C&D materials. Runoff containing this type of contact water is likely to have

relatively high loadings of total suspended solids (TSS) and total dissolved solids (TDS) relative to runoff without this contact water.

Comparatively, operation of the MRF/TS and C&D recovery facility may improve surface water quality compared to both baseline conditions. Waste processing operations will be located in covered structures which should result in more dust control than under baseline conditions. Also, since Project operations will be enclosed there will be less opportunity for any HHW, medical wastes, or other unauthorized materials detected in loads received at the facility to adversely affect surface water quality. Compared to outdoor operations, enclosed operations will also make it easier to control the leakage of fuel, oil, and grease from vehicles and equipment operating at the Project site.

The Project will result in all waste processing operations (transfer, MRF, and C&D recovery) occurring in covered buildings. Under baseline conditions, rainfall would contact C&D materials with runoff flows expected to include loadings of constituents typically found in C&D materials. With the Project, any wastewater used in conjunction with transfer, MRF, or C&D processing would flow to floor drains at the entrance to processing buildings from which wastewater would be conveyed to the existing catch basin.

Mitigation Measures. No mitigation is required.

Residual Impacts. Impacts would be less than significant.

3.5.5 Cumulative Impacts

Relationship to Related Projects. As indicated in the above discussion of Project impacts, implementation of the proposed Project will not result in an increased volume of runoff from the Project site or adversely affect the quality of runoff generated at the Project site. Accordingly, the Project will not have an incremental contribution on stormwater runoff problems in the Sun Valley area. As indicated in Section 15130(a)(1) of the *CEQA Guidelines,* which establishes guidelines for the assessment of cumulative impacts, "An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR." Because the Project will not result in an incremental impact to the local surface runoff management system, it would not contribute to any cumulatively considerable surface runoff impacts in areas served by the local storm drain system.

Relationship to Projections/Plans. As an industrial use, the Project is consistent with the land use designation for the Project site in the Sun Valley—La Tuna Canyon Community Plan (SVLTCCP). This Community Plan was adopted in 1999, the same year that the CUP for the Project site was approved. Accordingly, runoff generated from the Project site, as currently developed, is consistent with the level of development anticipated in the SVLTCCP. As indicated in the discussion of impacts above, the Project will not result in increased runoff flows and surface water quality (TDS, TSS) is likely to improve as Project operations are moved indoors. Accordingly, the cumulative impact of the Project is considered less than significant.

3.5.6 References

City of Los Angeles. 2006. *CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles.* May

Christopher A. Joseph Associates. 2005. *Bradley Landfill and Recycling Center Transition Mater Plan DEIR. December.* December. Page 4.8-1.

County of Los Angeles, 2004. *Sun Valley Watershed Management Plan.* Accessed March 15, 2007: http://www.sunvalley watershed.org/ceqa docs/plan.asp.

3.6 Traffic

3.6.1 Introduction

This section of the EIR is summarized from the *Athens Sun Valley Material Recovery Facility Traffic Impact Study* (TIS) prepared by Meyer-Mohaddes & Associates in January, 2008. This study was prepared in accordance with the Traffic Study Policies and Procedures of the City of Los Angeles Department of Transportation (LADOT) and with a Memorandum of Understanding (MOU) prepared by Meyer-Mohaddes (traffic consultant) for this TIS, which was approved by LADOT. Meyer-Mohaddes received verbal approval of the MOU on April 4, 2007. A copy of the MOU is included as Appendix D.

This Traffic Impact Study evaluates the operation of seven local intersections and two freeway on/off ramps during the a.m. and p.m. peak period (7-9 a.m. and 4-6 p.m.), agreed to by the City of Los Angeles Department of Transportation (LADOT). Traffic counts from one freeway on-ramp, I-5 at Tuxford Street, were included in the turning movement graphics, but were omitted from the Level of Service (LOS) analyses because it does not have any conflicting movements. (It is not controlled by a stop sign and/or a traffic signal.) These study intersections were chosen to represent those intersections deemed most likely to experience increases in traffic due to the Project. This section of the EIR provides key traffic information regarding existing traffic volumes, an analysis of impacts at study intersections, and a determination of levels of service (LOS) using the Circular 212 "Critical Movement Analysis" (CMA) method. Mitigation measures are recommended where appropriate.

The locations of the study intersections assessed in the traffic analysis are listed below:

1. San Fernando Road and Sheldon Street
2. Glenoaks Boulevard and Peoria Street
3. Interstate 5 Northbound off-ramp/Southbound on-ramp and Tuxford Street
4. San Fernando Road and Tuxford Street
5. Bradley Avenue and Tuxford Street
6. Glenoaks Boulevard and Tuxford Street
7. Interstate 5 Southbound on/off-ramp at Penrose Street
8. Bradley Avenue and Penrose Street
9. Glenoaks Boulevard and Pendleton Street
10. Interstate 5 Northbound on-ramp and Tuxford Street (Turning Movements Only)

The location of these intersections is shown in **Figure 3.6-1**.

Traffic counts were conducted at these 10 locations on Tuesday, April 24, 2007, during the a.m. and p.m. peak periods. The traffic impact analysis is based on the highest single hour of traffic during each peak period at the above locations.

3.6.2 Environmental Setting

A field inventory was conducted at the ten study intersection locations. The inventory included review of intersection geometric layout, traffic control, lane configuration, posted speed limits, transit service, land use, and parking. **Figure 3.6-2** illustrates the existing lane configurations. This information is required for the subsequent traffic impact analysis.

3.6.2.1 Existing Roadway Conditions

Regional access to the Project site is provided by the Golden State Freeway (I-5) and the Foothill Freeway (I-210). I-5 is located approximately 1 mile south of the Project site and provides north-south regional access to the site, and Interstate 210 is located approximately 3 miles north-west of the Project site and provides east-west regional access to the site. Within the Project study area, on/off ramps that connect to I-5 are located at Tuxford Street, Penrose Street, and Lankershim Boulevard.

Local roadways also provide access to the Project site. The following provides a brief description of these roadways within the study area.

San Fernando Road. San Fernando Road is a major roadway that travels in a northwest-southeast direction located west of the Project site. Within the study area, San Fernando Road provides two travel lanes in each direction, with left-turn lanes at several of the larger intersections. San Fernando Road borders the Southern Pacific Railroad currently utilized by the Antelope Valley Metrolink line.

Glenoaks Boulevard. Glenoaks Boulevard is a major roadway that travels in a northwest-southeast direction located immediately west of the Project site. The western portion of the Project site is bordered by Glenoaks Boulevard, but there will be no direct Project access to this roadway. Within the study area, Glenoaks Boulevard provides two travel lanes in each direction, with left-turn lanes at larger intersections.

Sheldon Street. Sheldon Street is a secondary roadway that travels in a northeast-southwest direction located northwest to the Project site. It provides two travel lanes in each direction divided by an intermittent two-way left-turn lane.

Tuxford Street. Tuxford Street is a major roadway that travels in a northeast-southwest direction located south of the Project site. Within the study area, Tuxford Street provides two travel lanes in each direction, with access to I-5, west of San Fernando Road.

Penrose Street. Penrose Street is a secondary roadway that travels in a northeast-southwest direction located south of the Project site. Penrose Street provides two travel lanes in each direction west of Bradley Avenue, and one travel lane in each direction east of Bradley Avenue. Penrose Street provides access to I-5, between San Fernando Road and Bradley Avenue.

Peoria Street. Peoria Street is classified as a secondary roadway west of Glenoaks Boulevard, and a collector street east of Glenoaks Boulevard. It travels in a northeast-southwest direction and is located north of the Project site. Peoria Street provides one travel lane in each direction.

Pendleton Street. Pendleton Street is classified as a collector street that travels in a northeast-southwest direction immediately south of the Project site. Pendleton Street abuts the southern portion of the Project site, and will serve as the Project's main access point. Pendleton Street has one travel lane in each direction.

Bradley Avenue. Bradley Avenue is a secondary roadway that travels in a northwest-southeast direction located southwest of the Project site. Within the study area, Bradley Avenue provides one travel lane in each direction.

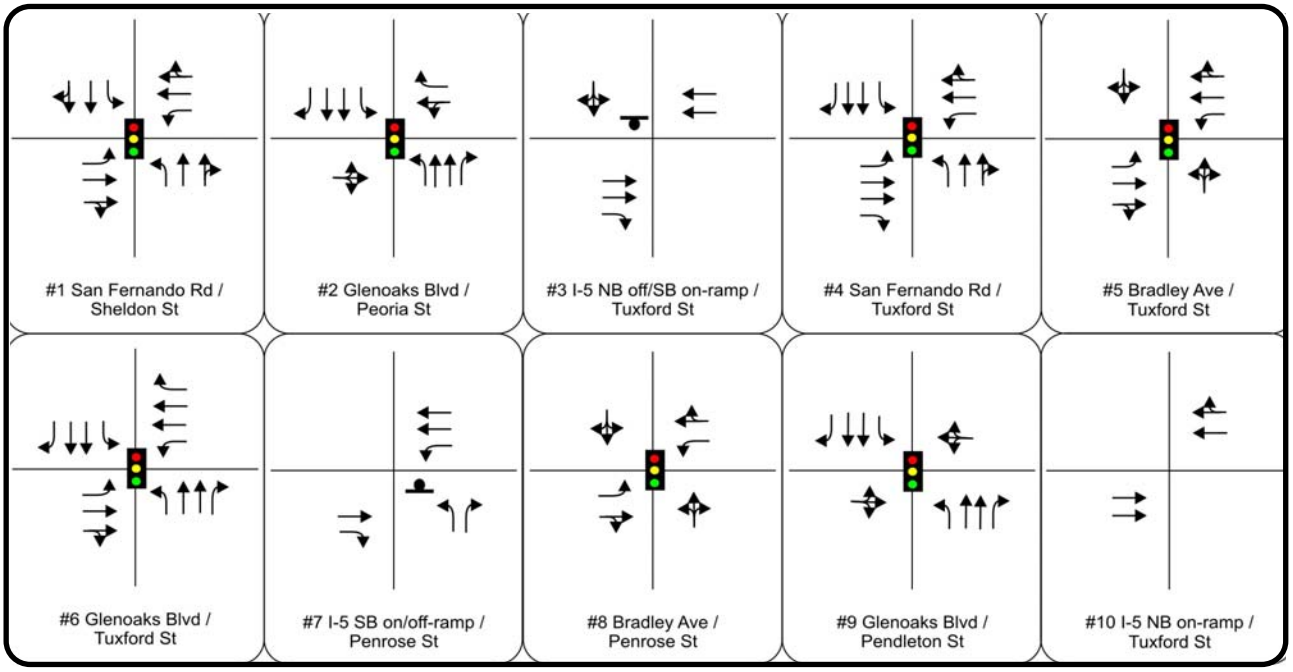
North

FIGURE 3.6-1
Study Area
Athens Sun Valley MRF

Source: Meyer, Mohaddes Associates

355351.01.01 Figure_1-6_Study_Area_1 6.27.07 cae

CH2MHILL



Legend

- Traffic Signal
- Through Lane
- Turn Lane
- Shared Lane
- Stop Sign

North

FIGURE 3.6-2
Existing Lane Configurations
Athens Sun Valley MRF

Source: Meyer, Mohaddes Associates

3.6.2.2 Existing Transit Service

The Metropolitan Transit Authority (Metro) operates four fixed bus routes within the vicinity of the Project site. In addition, Metrolink has a transit station along its Antelope Valley Line in Sun Valley, approximately 1 mile south of the Project site. **Figure 3.6-3** illustrates each transit line in relation to the Project site. A description of transit service is provided below:

Metro Line 92. (Sylmar—Downtown Los Angeles via Glenoaks Boulevard, Brand Boulevard, Glendale Boulevard, Temple Street, Spring Street, and Main Street). Metro Line 92 runs northwest-southeast near the Project site via Glenoaks Boulevard. It begins at Main Street and 11 Street in downtown Los Angeles and ends at the Sylmar/San Fernando Metrolink Station in Sylmar. Days of operation are Monday through Sunday, including all major holidays. Weekday peak period headway near the Project site ranges between 15 to 24 minutes during the a.m. peak period, and 27 to 37 minutes during the p.m. peak period. Weekend mid-day peak period headway ranges between 30 to 40 minutes.

Metro Lines 94 and 394. (Sylmar—Downtown L.A. via San Fernando Road and Spring Street). Metro Line 94/394 runs northwest-southeast near the Project site via San Fernando Road. It starts at Hill Street and Venice Boulevard in downtown Los Angeles and ends at the Sylmar/San Fernando Metrolink Station in Sylmar. Days of operation are Monday through Sunday, including all major holidays. Line 394 is a limited stop route providing service only during the weekday morning and evening peak periods. Line 94 provides service everyday. Weekday peak period headway near the Project site ranges between 10 to 14 minutes during the a.m. peak period, and 14 to 17 minutes during the p.m. peak period. Weekend mid-day peak period headway ranges between 17 to 33 minutes.

Metro Line 152 and 153. (Woodland Hills—North Hollywood via Roscoe Boulevard and Vineland Avenue). Metro Line 152/153 runs north-south near the Project site via Sunland Boulevard. It starts at the North Hollywood Red Line Station and ends at Fallbrook Avenue and Ventura Boulevard in Woodland Hills. Days of operation for Line 152 are Monday through Sunday, including all major holidays. Line 153 only operates Monday through Friday. Weekday peak period headway near the Project site ranges between 15 to 35 minutes during the a.m. peak period, and 30 minutes during the p.m. peak period. Weekend mid-day peak period headway ranges between 25 to 30 minutes.

Metro Line 169. (East-West Local Service) —Metro Line 169 runs north-south near the Project site via Sunland Boulevard. It starts at West Hills Medical Center in West Hills and ends at Summitrose Street and Tinker Avenue in Sunland. Days of operation are Monday through Sunday, including all major holidays. Weekday peak period headway near the Project site is approximately 1 hour during the a.m. peak period, and 53 minutes to 1 hour during the p.m. peak period. Weekend mid-day peak period headway is approximately 1 hour.

Metrolink. Metrolink is a commuter rail service operating on the Union Pacific Railroad (UPRR) right-of-way located southwest of the Project site, paralleling San Fernando Road. The Metrolink station is located along the Antelope Valley Line in Sun Valley on San Fernando Road, between Penrose Street and Sunland Boulevard, days of operation are Monday though Saturday only. Weekday peak period headway at the Sun Valley station is approximately 30 minutes during the a.m. peak period, and 1 hour and 50 minutes during

the p.m. peak period. Weekend mid-day peak period headway is approximately 1 hour and 30 minutes.

3.6.2.3 Traffic Operations Analysis Methodology

Traffic operating conditions in the vicinity of the Project were analyzed using the intersection capacity-based methodology known as the Circular 212 "Critical Movement Analysis" (CMA) method for signalized locations. At the stop-controlled intersection, the Highway Capacity Manual (HCM) methodology for unsignalized locations was used to calculate the average delay and corresponding LOS.

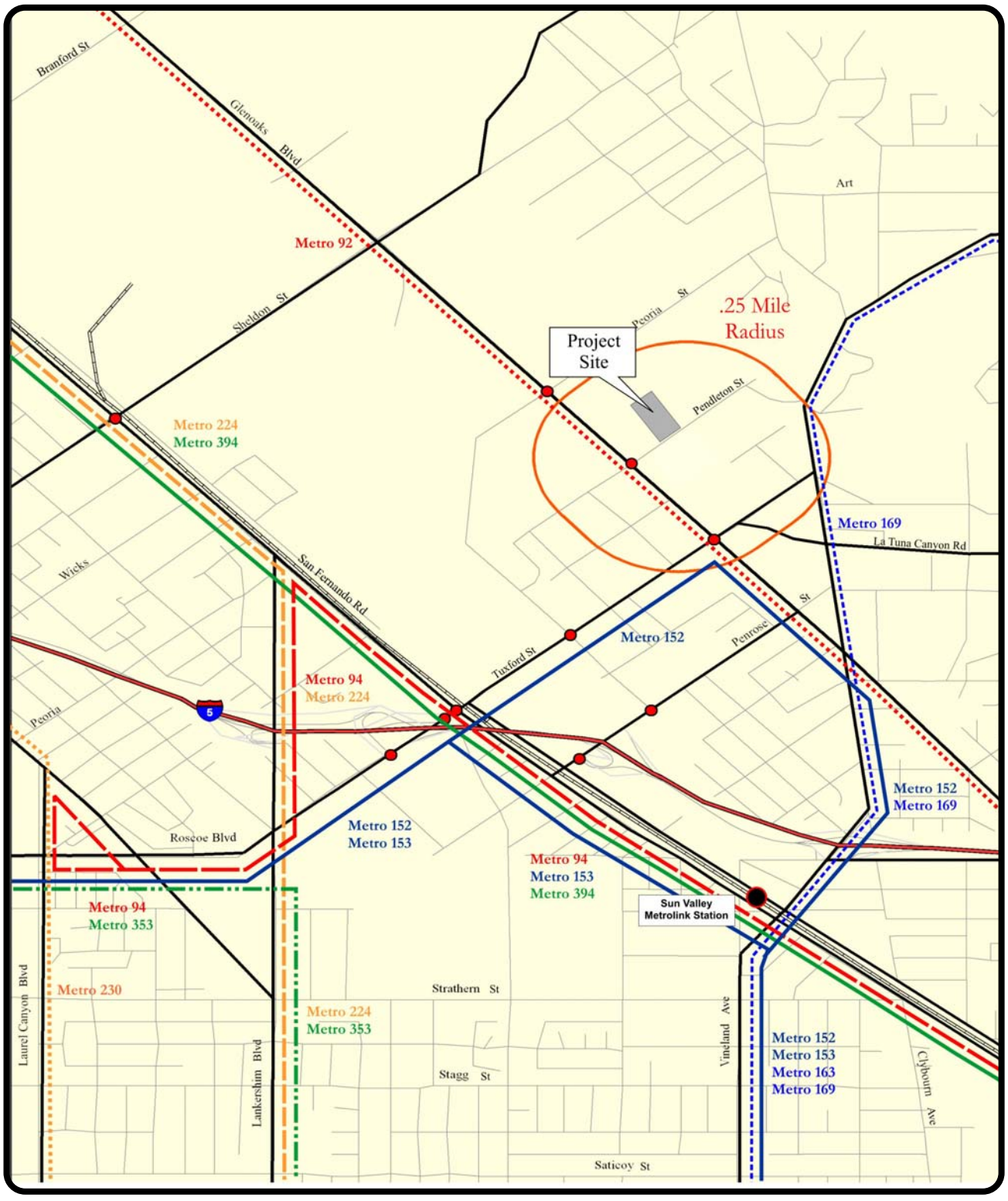
The efficiency of traffic operations at a location is measured in terms of LOS. LOS is a description of traffic performance at intersections. The LOS concept is a measure of average operating conditions at intersections during 1 hour. It is based on a volume-to-capacity (V/C) ratio for signalized locations and vehicle delay (in seconds) for stop-controlled intersections. Levels range from A to F with A representing excellent (free-flow) conditions and F representing extreme congestion. The CMA methodology compares the amount of traffic an intersection is able to process (the capacity) to the level of traffic during the peak hours (volume). A volume-to-capacity (V/C) ratio is calculated to determine the LOS. The HCM method for stop-controlled intersections calculates the average delay, in seconds, per vehicle for each approach and for the intersection as a whole. The delay for the intersection corresponds to a LOS value, which describes the intersection operations. Intersections with vehicular volumes that are at or near capacity experience greater congestion and longer vehicle delays. **Table 3.6-1** describes the LOS concept and the operating conditions for signalized and stop-controlled intersections.

3.6.2.4 Baseline Scenarios

Two baselines are used to assess the impacts of the Project:

- **400-tpd Baseline:** This baseline assumes the facility is accepting 400-tpd C&D materials, and was derived based on actual trip counts and information and documentation regarding the total tonnage accepted on the day of the traffic counts. Rates derived under this baseline scenario were compared against rates from other traffic studies for similar Projects.
- **1,500-tpd Baseline:** This baseline assumes the facility accepts 1,500 tpd of waste materials, as allowed under the 1999 CUP.

All traffic analyses in this report are based on the highest single hour of traffic during the a.m. and p.m. peak period at the nine study intersections. New traffic counts were conducted between 7 to 9 a.m. and 4 to 6 p.m. on Tuesday, April 24, 2007. Because of the large volume of existing trucks in the vicinity of the Project, the existing traffic volumes were converted to Passenger Car Equivalent (PCE) using a factor of 2.0. This means that the impact of each truck is measured as the equivalent of two autos. The truck percentage of total vehicles was obtained from the *2005 Annual Average Daily Truck Traffic on the California State Highway System,* published by the State of California Department of Transportation. The truck percentage for the study area was estimated to be 7.8 percent of total vehicles, and was calculated by averaging the truck percentage at the two closest post miles to the Project site, Sun Valley, JCT. RTE. 170, and the Hollywood Freeway A and B.

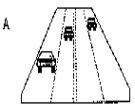
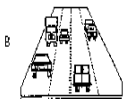
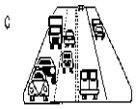
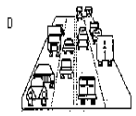


North

FIGURE 3.6-3
Existing Transit
Athens Sun Valley MRF

Source: Meyer, Mohaddes Associates

TABLE 3.6-1
Intersection LOS Definitions

LOS		Definition	Volume to Capacity Ratio (Signalized)	Delay per Vehicle (Unsignalized)
A		EXCELLENT. Primarily free-flow conditions at about 90 percent of free-flow speed. Vehicles are completely free to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.	0.000 - 0.600	< 10
B		VERY GOOD. Reasonably unimpeded flow at about 70 percent of free-flow speed. Ability is only slightly restricted and delay at intersections is not bothersome.	0.601 - 0.700	>10 and ≤ 15
C		GOOD. Stable operations at about 50 percent of free-flow speed. Ability to maneuver and change lanes may be restricted at mid-block locations. Motorists will begin to experience appreciable tension while driving.	0.701 - 0.800	>15 and ≤ 25
D		FAIR. Small increases in flow begin to cause substantial increases in intersection approach delay. Ability to maneuver becomes more difficult, with speeds about 40 percent of free-flow speed.	0.801 - 0.900	>25 and ≤ 35
E		POOR. Characterized by significant delays at intersection approaches and travel speeds about one-third of free-flow speed or less. Ability to maneuver is severely restricted and driver tension is high.	0.901 - 1.000	>35 and ≤ 50
F		FAILURE. Extremely low travel speeds and unstable traffic flow. Characterized by long delays at intersection approaches, severe difficult in maneuvering between lanes, and extremely high driver tension.	> 1.000	> 50

Source: Adopted from Transportation Research Board (TRB), Highway Capacity Manual, Special Report 209, Third Edition, 1994.

Project Trip Generation

The first step in analyzing traffic conditions is to estimate the number of new trips expected to be generated by the Project. Trip generation rates for the 400-tpd baseline condition and 1,500-tpd baseline were derived based on existing traffic counts and information provided by Athens. Athens provided information regarding the number of existing trips per day , peak hour trips and the average weight of C&D and MSW trips. This data was confirmed by the traffic consultant conducting hourly traffic counts at the entrance to the facility. These counts noted the number and types of vehicles entering the facility during each hourly bandwidth. This data was used to develop peak period trip generation rates for both baselines and were compared to similar rates from other traffic studies for similar Projects (Simi Valley Landfill Traffic Impact Analysis [TIA], Puente Hills Landfill DEIR). The results for both baselines are shown in **Table 3.6-2.**

TABLE 3.6-2
RAW Trip Generation Rates and Estimates for Baseline Scenarios

	Weekday a.m.			Weekday P.M.		
	In	Out	Total	In	Out	Total
400-tpd Baseline	16	8	**24**	20	20	**40**
1,500-tpd Baseline	60	29	**89**	75	73	**148**

Note: Athens Services
The trip generation rates used for the LOS analysis are different from the raw trip generation numbers shown above. The trip generation rates shown in this table were converted to passenger car equivalents (PCEs) in the TRAFFIX analysis using a conversion factor of 2.0 (1 truck trip=2 passenger car trips).

The negative declaration that supported the 1999 CUP, which the existing facility currently operates under, was prepared pursuant to certain traffic assumptions. According to the traffic analysis that was prepared as part of the negative declaration, 440 daily trips would be generated as project site processed 1,500 tpd of waste materials, which is more than the 237 trips assumed by the 1,500-tpd baseline, as shown in **Table 3.6-2**. In the interest of being conservative, the lower baseline amount of 237 daily trips is chosen as the 1,500-tpd baseline amount for the analysis below. As shown in the Traffic Study (Appendix D), the facility could accept up to 1,925 tpd under the 440-tpd baseline if all MSW was accepted at the site.

Project Trip Distribution

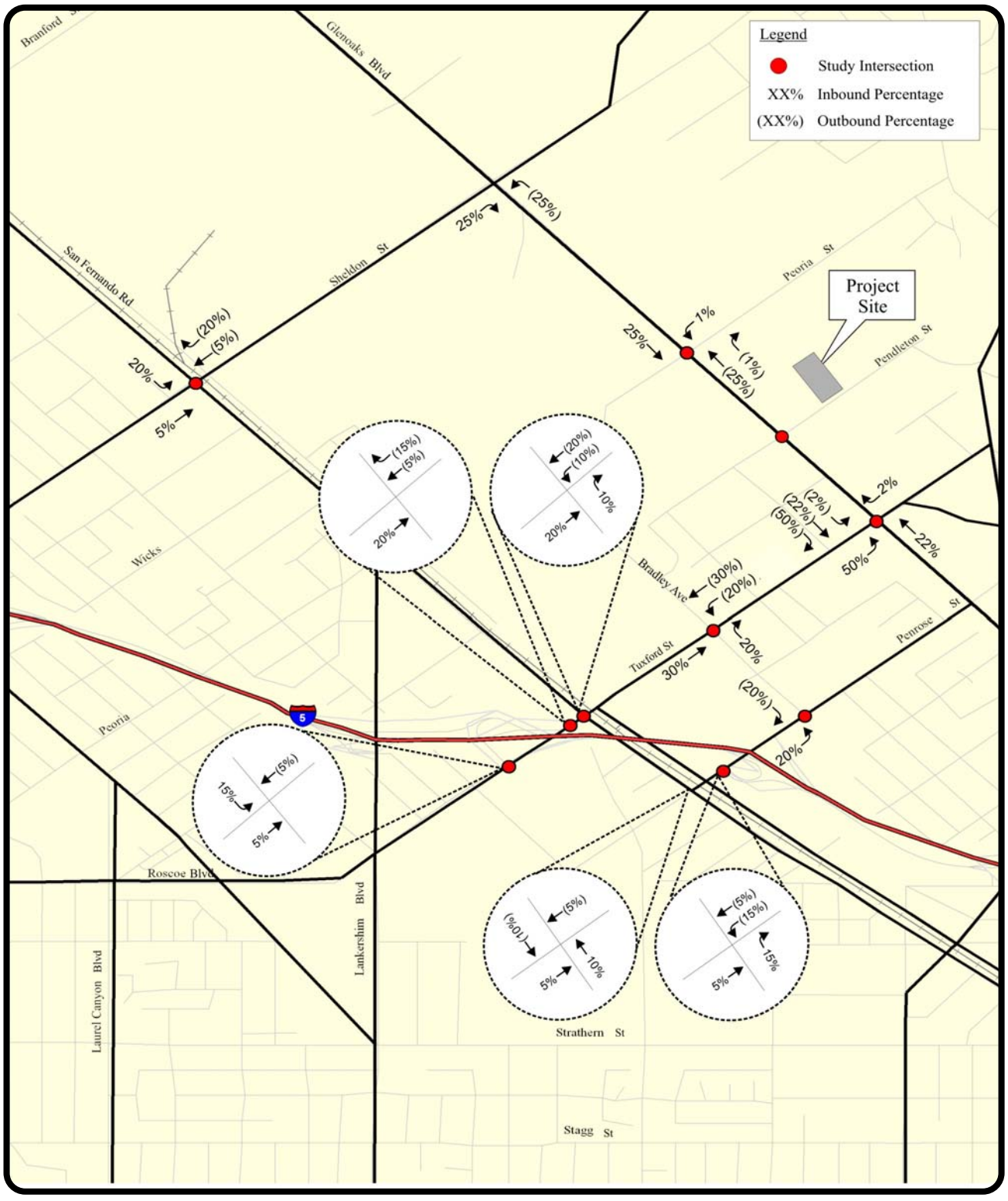
The next step in the forecast of Project traffic is the distribution of the trip estimates. The trip distribution assumptions are used to determine the origin and destination of the vehicle trips associated with the Project. The geographic distribution of the Project trips was developed based on data provided by Athens Services regarding likely directions of approach for Project traffic and the trip distribution used in the Bradley Landfill Expansion EIR. Based on the data provided, a distribution pattern was developed for the Project and is shown in **Figure 3.6-4**.

400-tpd Baseline

Presently, the ASW facility accepts approximately 400 tpd of C&D waste. This baseline includes all traffic currently generated by the existing Project site or 400-tpd C&D materials. The existing weekday a.m. and p.m. peak hour intersection counts include the existing trips representing 400 tpd C&D at the site.

The a.m. and p.m. peak hour LOS analyses were conducted at the nine existing study intersections based on the existing traffic volume counts and the methodologies described previously. The LOS analysis was performed using TRAFFIX software, version 7.8.

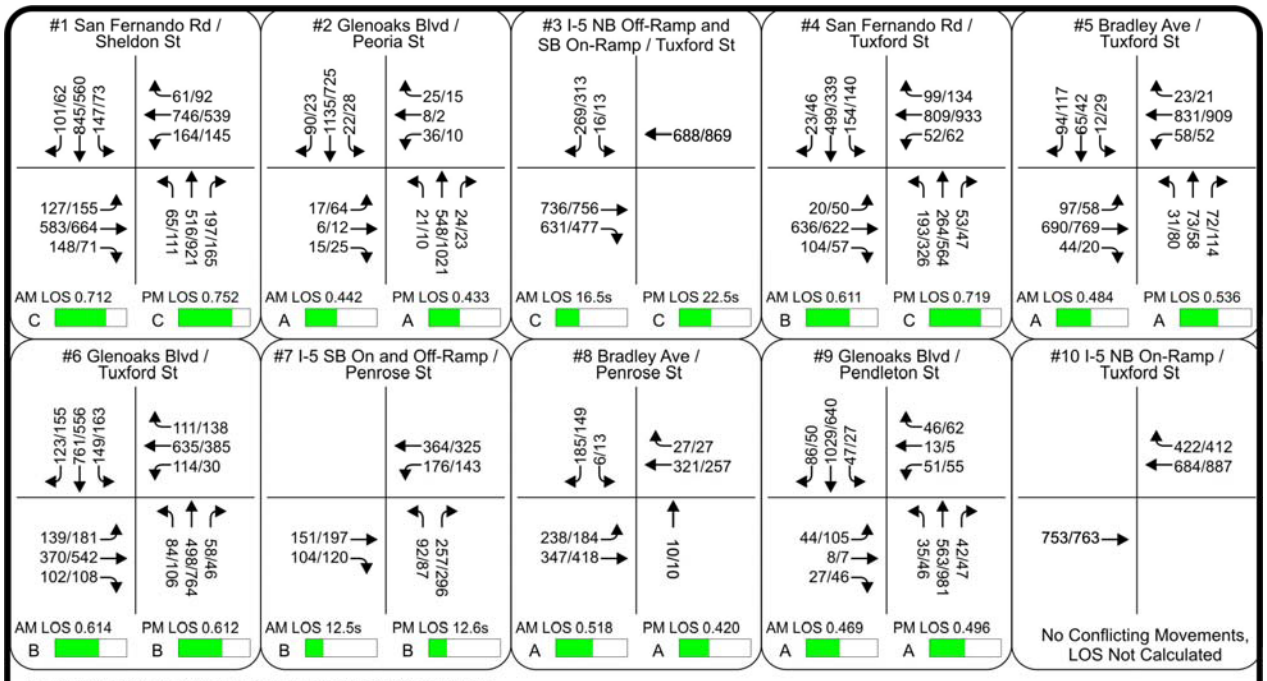
LOS D is generally considered to be the lowest acceptable LOS in an urban or suburban area. LOS E and F are considered to be unacceptable operating conditions which warrant mitigation. **Table 3.6-3** summarizes the LOS calculations for the study intersections under 400-tpd C&D baseline conditions during the a.m. and p.m. peak hours. The results indicate that all nine study intersections operate at an acceptable LOS (LOS 'C' or better) during the existing a.m. and p.m. peak hour. Turning movement volumes and LOS at the study intersections for the 400-tpd baseline, and the existing average daily traffic (ADT) volumes near the Project site are shown in **Figures 3.6-5 and 3.6-6**, respectively. Traffic count sheets and level service analysis worksheets are provided in **Appendix D.**



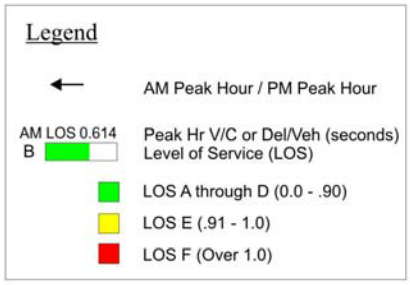
North

FIGURE 3.6-4
Project Trip Distribution Solid Waste Trips
Athens Sun Valley MRF

Source: Meyer, Mohaddes Associates



Note: Turning movement volumes shown above reflect a 2.0 PCE conversion.

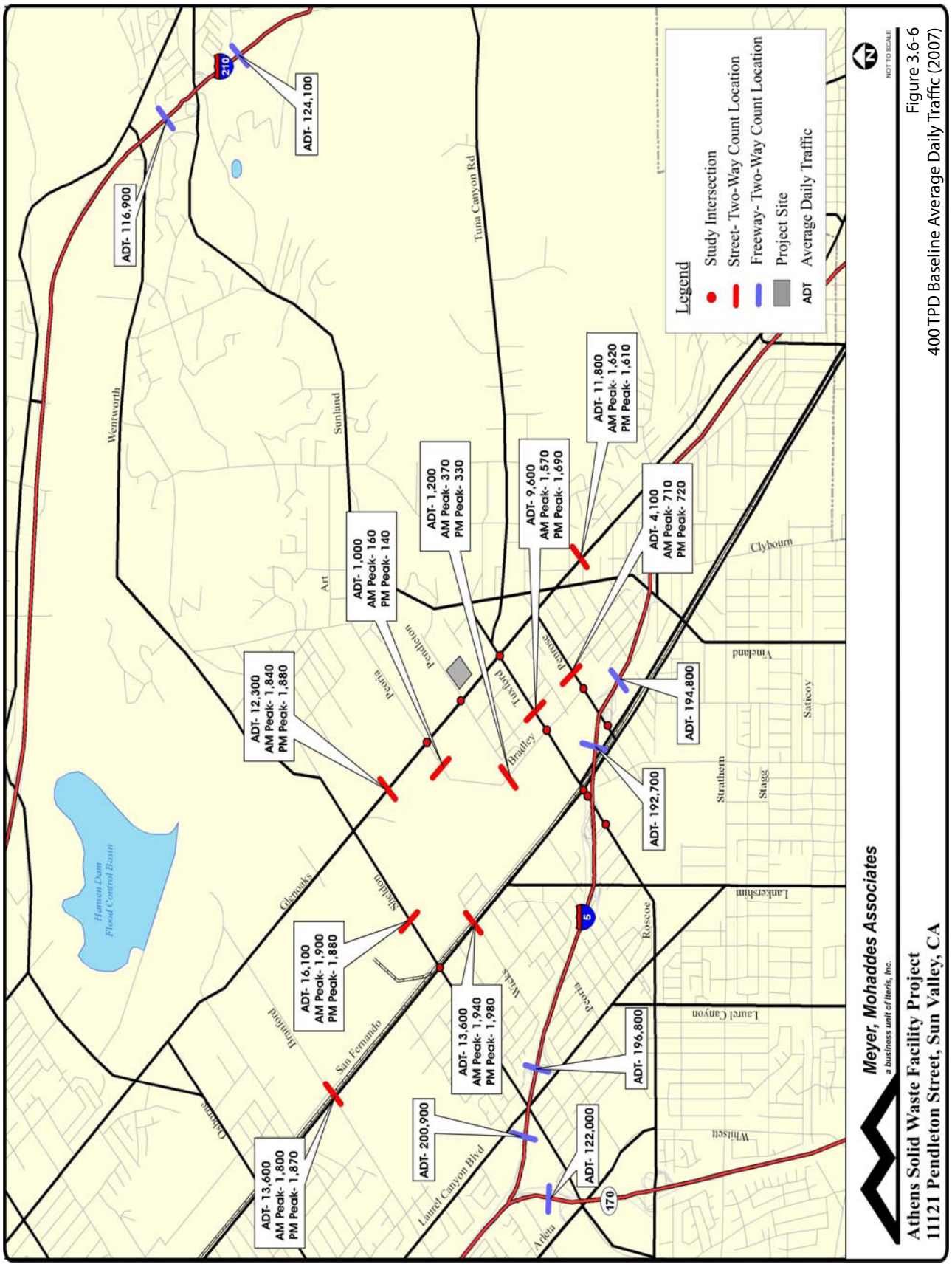


Meyer, Mohaddes Associates

a business unit of Iteris, Inc.

Athens Solid Waste Facility Project
11121 Pendleton Street, Sun Valley, CA

Figure 3.6-5
400 TPD Baseline
Peak Hour Turning Movement Volumes


Legend
Study Intersection
Street- Two-Way Count Location
Freeway- Two-Way Count Location
Project Site
ADT Average Daily Traffic
ADT- 124,100
ADT- 116,900
ADT- 11,800
AM Peak- 1,620
PM Peak- 1,610
ADT- 9,600
AM Peak- 1,570
PM Peak- 1,690
ADT- 1,200
AM Peak- 370
PM Peak- 330
ADT- 1,000
AM Peak- 160
PM Peak- 140
ADT- 4,100
AM Peak- 710
PM Peak- 720
ADT- 12,300
AM Peak- 1,840
PM Peak- 1,880
ADT- 194,800
ADT- 192,700
ADT- 16,100
AM Peak- 1,900
PM Peak- 1,880
ADT- 13,600
AM Peak- 1,940
PM Peak- 1,980
ADT- 196,800
ADT- 200,900
ADT- 122,000
ADT- 13,600
AM Peak- 1,800
PM Peak- 1,870
Tuna Canyon Rd
Wentworth
Sunland
Art
Tuxford
Bradley
Penrose
Clybourn
Vineland
Saticoy
Strathern
Stagg
Lankershim
Roscoe
Laurel Canyon
Whitsett
Arleta
Glenoaks
Sheldon
Hansen Dam
Flood Control Basin
San Fernando
Branford
Osborne
Laurel Canyon Blvd
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Athens Solid Waste Facility Project
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NOT TO SCALE
Figure 3.6-6
400 TPD Baseline Average Daily Traffic (2007)

TABLE 3.6-3
400-tpd Baseline-Peak Hour LOS Summary

		400-tpd Baseline:			
		A.M. Peak Hour		P.M. Peak Hour	
	Intersection	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh
1	San Fernando Road and Sheldon Street	C	0.712	C	0.752
2	Glenoaks Boulevard and Peoria Street	A	0.442	A	0.433
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	16.5 sec	C	22.5 sec
4	San Fernando Road and Tuxford Street	B	0.611	C	0.719
5	Bradley Avenue and Tuxford Street	A	0.484	A	0.536
6	Glenoaks Boulevard and Tuxford Street	B	0.614	B	0.612
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	12.5 sec	B	12.6 sec
8	Bradley Avenue and Penrose Street	A	0.518	A	0.420
9	Glenoaks Boulevard and Pendleton Street	A	0.469	A	0.496

1,500-tpd Baseline

The existing facility currently operates under a CUP ZA-98-0427 (CUZ), approved by the City of Los Angeles in 1999. The CUP authorizes the facility to accept up to 1,500 tpd. Trips generated under this baseline were estimated using standard solid waste industry assumptions about load size. Since this baseline assumes all materials processed at the facility are C&D materials, all incoming loads are estimated using an average weight of five tons per load. Outgoing loads in transfer vehicles are estimated at 23 tons per load. As discussed above, in the interest of being conservative, the estimated baseline traffic is used instead of the 440 trips relied upon by the negative declaration that accompanied the 1999 CUP approval.

Utilizing these trip generation factors and the trip distribution pattern, the Project-only traffic volumes generated by 1,500-tpd baseline were assigned to the street network, and the resulting LOS and V/C ratios were calculated. Turning movement volumes at the nine study intersections for the 1,500-tpd C&D baseline are shown in **Figure 3.6-7**.

The a.m. and p.m. peak hour LOS analyses were conducted at the nine study intersections based on the methodologies described previously. **Table 3.6-4** summarizes the LOS calculations for the study intersections under 1,500-tpd C&D baseline conditions during the a.m. and p.m. peak hours. The results indicate that all nine study intersections operate at an acceptable LOS (LOS 'C' or better) during the a.m. and p.m. peak hour. LOS analysis worksheets for this scenario are provided in **Appendix D.**

TABLE 3.6-4
1,500-tpd Baseline Peak Hour LOS Summary

		1,500-tpd C&D Baseline (Existing)			
		A.M. Peak Hour		P.M. Peak Hour	
	Intersection	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh
1	San Fernando Road and Sheldon Street	C	0.714	C	0.755
2	Glenoaks Boulevard and Peoria Street	A	0.445	A	0.435
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	17.6 sec	C	23.6 sec
4	San Fernando Road and Tuxford Street	B	0.612	C	0.721
5	Bradley Avenue and Tuxford Street	A	0.485	A	0.541
6	Glenoaks Boulevard and Tuxford Street	B	0.630	B	0.621
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	12.6 sec	B	12.7 sec
8	Bradley Avenue and Penrose Street	A	0.531	A	0.428
9	Glenoaks Boulevard and Pendleton Street	A	0.483	A	0.514

3.6.3 Impacts and Mitigation Measures

3.6.3.1 Thresholds of Significance

Per CEQA, any significant Project-related impacts are required to be identified in the environmental document. Significant traffic impacts are determined based on a threshold of significance set by the lead agency for each project. The LADOT has established threshold criteria to determine if a project has a significant traffic impact. Using the LADOT standard, a project impact would be considered significant if the following conditions are met:

Using these criteria, for example, the Project would not have a significant impact on an intersection if it is operating at LOS C after the addition of Project traffic and the incremental change in the V/C ratio is less than 0.040. However, if the intersection is operating at a LOS F after the addition of Project traffic and the incremental change in the V/C ratio is 0.010 or greater, the Project would be considered to have a significant impact at this location. These criteria were applied to all of the analyzed intersections within the study area.

To evaluate if an unsignalized intersection would have a significant traffic impact, the intersection was analyzed as if it were signalized, and the Project-related increase in the V/C ratio was evaluated using the same thresholds as shown above.

LA DOT Significance Criteria		
Final V/C Ratio		Project V/C Increase
LOS	V/C	
C	0.700 – 0.800	0.040 or more
D	0.800 – 0.900	0.020 or more
E/F	0.90 or more	0.010 or more

Source: City of Los Angeles Department of Transportation, Traffic Policies and Procedures, 2003

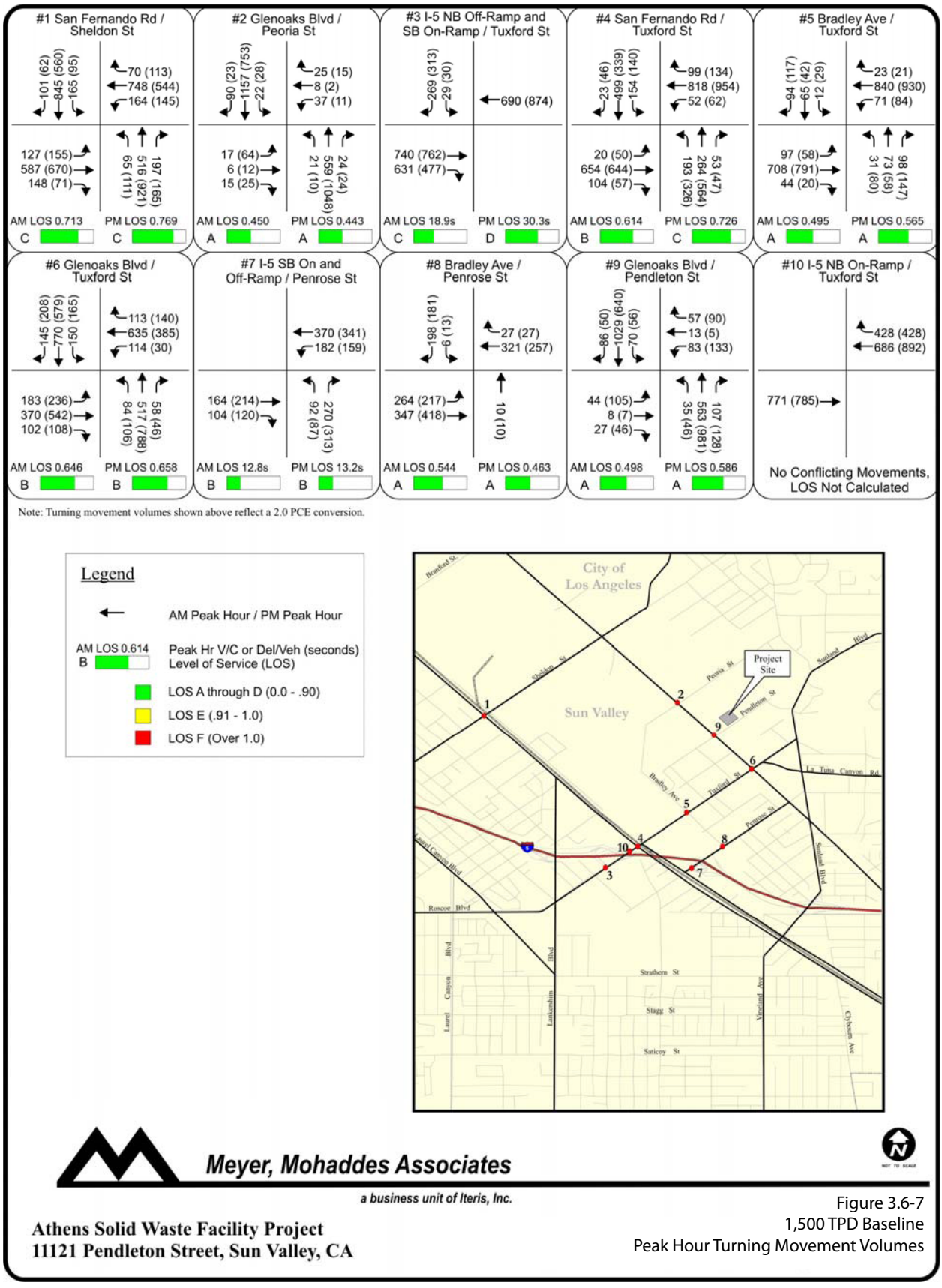


Figure 3.6-7
1,500 TPD Baseline
Peak Hour Turning Movement Volumes

3.6.3.2 Impact Analysis Methodology

To evaluate the potential impact of the Project on local traffic conditions, it is first necessary to develop a forecast of future traffic volumes in the study area under future conditions without the Project. This provides a basis against which to measure the potential significant impacts of the Project. To determine future background traffic volumes on the study area roadways and intersections, two primary variables were considered: (1) ambient traffic growth rate, and (2) traffic due to other known or related future development projects. The background (pre-Project) traffic forecasts include a determination of the annual ambient traffic growth rate combined with specific related development projects in the area, which may affect increases in local traffic. An ambient background traffic growth rate of 1.24 percent per year is applied in this study, consistent with the Los Angeles County Congestion Management Program guidelines for traffic impact analyses. For this analysis, the future study year is assumed to be 2008. Future traffic volumes with ambient growth only are provided in **Figure 3.6-8**.

For this Project, an additional variable was included in this impact assessment methodology. The traffic impact assessment in the Bradley Landfill DEIR concludes that the Bradley Project will have significant impacts that require implementation of the City's Adaptive Traffic Control System (ATCS) mitigation measure. According to the Bradley Landfill and Recycling Center Traffic Analysis conducted for the Bradley Landfill EIR (Crain, 2005), the ATCS mitigation measure is necessary at the following intersections:

- San Fernando Road and Sheldon Street
- San Fernando Road and Tuxford Street
- Bradley Avenue and Tuxford Street
- Glenoaks Boulevard and Tuxford Street

Under current City policy, ATSC implementation is the responsibility of the first project approved in the City requiring this mitigation. The costs of ATSC improvements are not prorated. Since it is not certain whether the Athens Project will be approved and constructed prior to the Bradley project, this analysis assesses traffic impacts with and without the implementation of ATSC mitigation. For analyses that assume that Bradley is constructed first, a 7 percent reduction in the final V/C ration is applied to the four study intersections identified above.

3.6.3.3 Related Project Traffic Growth

Related Project traffic growth is a result of specific known development projects in the study area. Based on information obtained from the City of Los Angeles and previous studies conducted in the area, a total of six related projects were identified that may affect traffic circulation within the study area. **Table 3.6-5** summarizes the location, size, and type of land uses for the related projects. **Figures 3.6-9 and 3.6-10** illustrate the general location of the related projects and the related Project trip generation.

TABLE 3.6-5
Related Projects Trip Generation Estimates—A.M. and P.M. Peak Hour

Project Number	Description/ Land Use	Variable		Daily Trips	Weekday A.M. peak Hour Trips			Weekday P.M. Peak Hour Trips		
					In	Out	Total	In	Out	Total
1	Pendleton Street Open Air Market-11051 Pendleton Street	285.705	KSF	6,537	302	193	**495**	194	210	**404**
2	Sun Valley Care Ministries—9000 Sunland Boulevard	[a]		1,582	89	49	**138**	74	103	**177**
3	Sunland Commercial—8652 Sunland Boulevard	17	KSF	506	32	11	**43**	48	108	**156**
4	LAUSD Byrd High School—9171 Telfair Avenue	1620	Seats	2,770	421	357	**778**	107	120	**227**
5	Community Recycling and Recovery—9143 to 9189 DeGarmo Avenue and 11300 W. Pendleton Street	[b]		701	68	40	**108**	22	22	**44**
6	Bradley Landfill Recycling Center (BLRC)—Phase II Construction	[c]		5,738	236	223	**459**	277	242	**519**
TOTAL				**17,834**	**1,148**	**873**	**2,021**	**722**	**805**	**1,527**

[a]Proposed uses include Institutional (Summer Camp-140 students, College 50 Students), Commercial (Retail-15,040 sf, office-17,040 sf), Residential (SFR- 2 du)

[b]Proposed permit increases the transfer station/MRF to 2,500-tpd, 2,000-tpd C&D, 1,500-tpd organics, 500-tpd food materials, and 200-tpd wood materials.

Trip generation rates were calculated at a rate of 10 tons per load for MSW trucks IN, 5 tons per load for C&D trucks IN, and 23 tons per load for C&D and MSW trucks OUT. Final trip generation rates were converted to PCE using a conversion factor of 2.0.

[c]Construction trips calculated using the Ph 2 trips in the Bradley Traffic Impact Analysis, Table 7. Employee trips were not included because they fall outside the A.M. and P.M. peak periods.

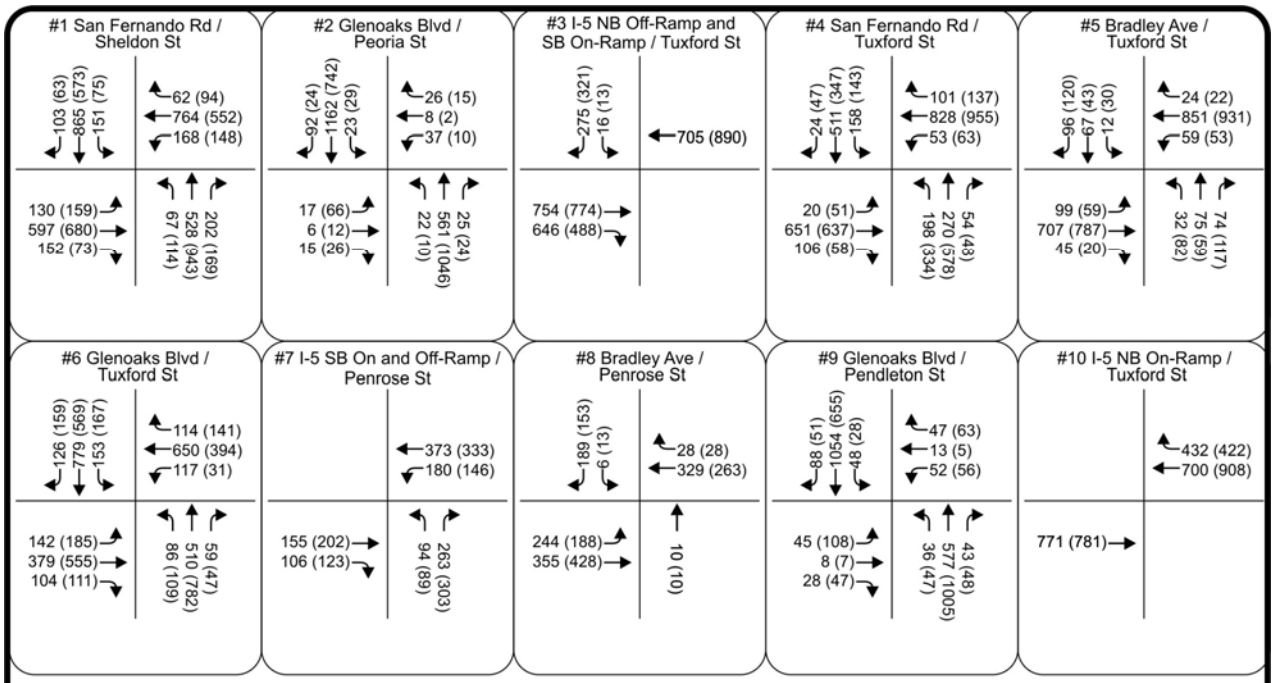
Traffic generated due to these projects has been estimated based on information from the LADOT, previous studies in the area, and supplemented with standard trip generation data from the Institute of Transportation Engineers' (ITE) *Trip Generation, 7th Edition.* Trip generation rates for the Community Recycling Project were obtained from the consultant preparing the traffic impact assessment for this Project. As shown, the six related projects are forecast to generate a total of approximately 2,021 trips during the a.m. peak hour (1,148 trips in and 873 trips out), and 1,527 trips during the p.m. peak hour (722 trips in and 805 trips out). These related project trips were assigned to the roadway system by the traffic model as part of the development of the future conditions without the Project.

3.6.3.4 400-tpd Baseline Plus Related Projects

This section describes traffic conditions at Project intersections for the 400-tpd baseline with and without the Bradley project.

400-tpd Baseline with Bradley

The a.m. and p.m. peak hour level of service analyses were conducted at the nine study intersections based on the methodologies described previously. To determine if an unsignalized intersection (stop controlled) had a significant impact, unsignalized intersections were analyzed as signalized intersections using the CMA method for signalized intersections. The same aforementioned threshold of significance criteria was applied.



Note: Turning movement volumes shown above reflect a 2.0 PCE conversion.

Legend

← AM Peak Hour / PM Peak Hour

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Figure 3.6-8
400 TPD Baseline
Peak Hour Turning Movement Volumes-Ambient Growth Only

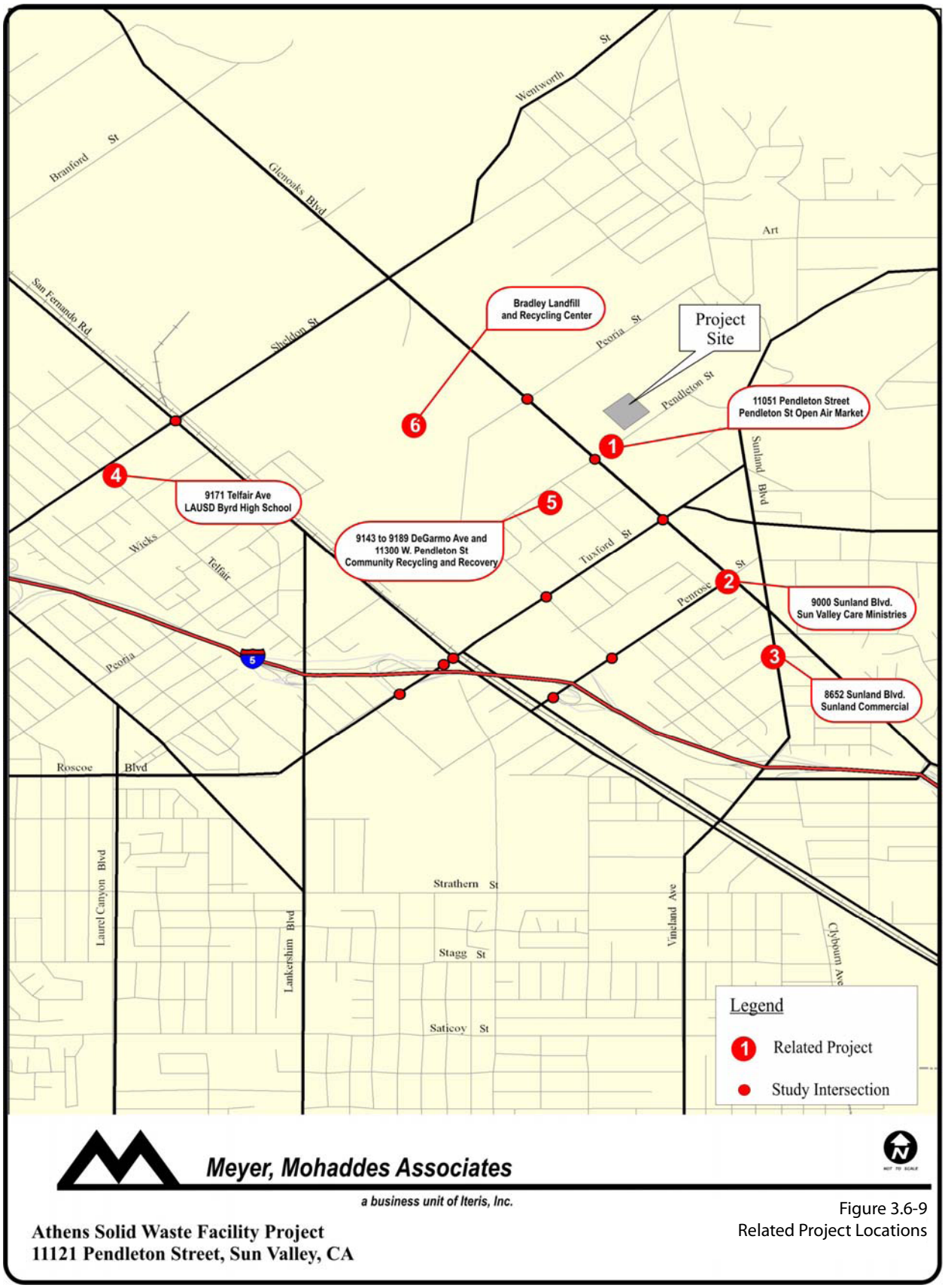

Figure 3.6-9
Related Project Locations

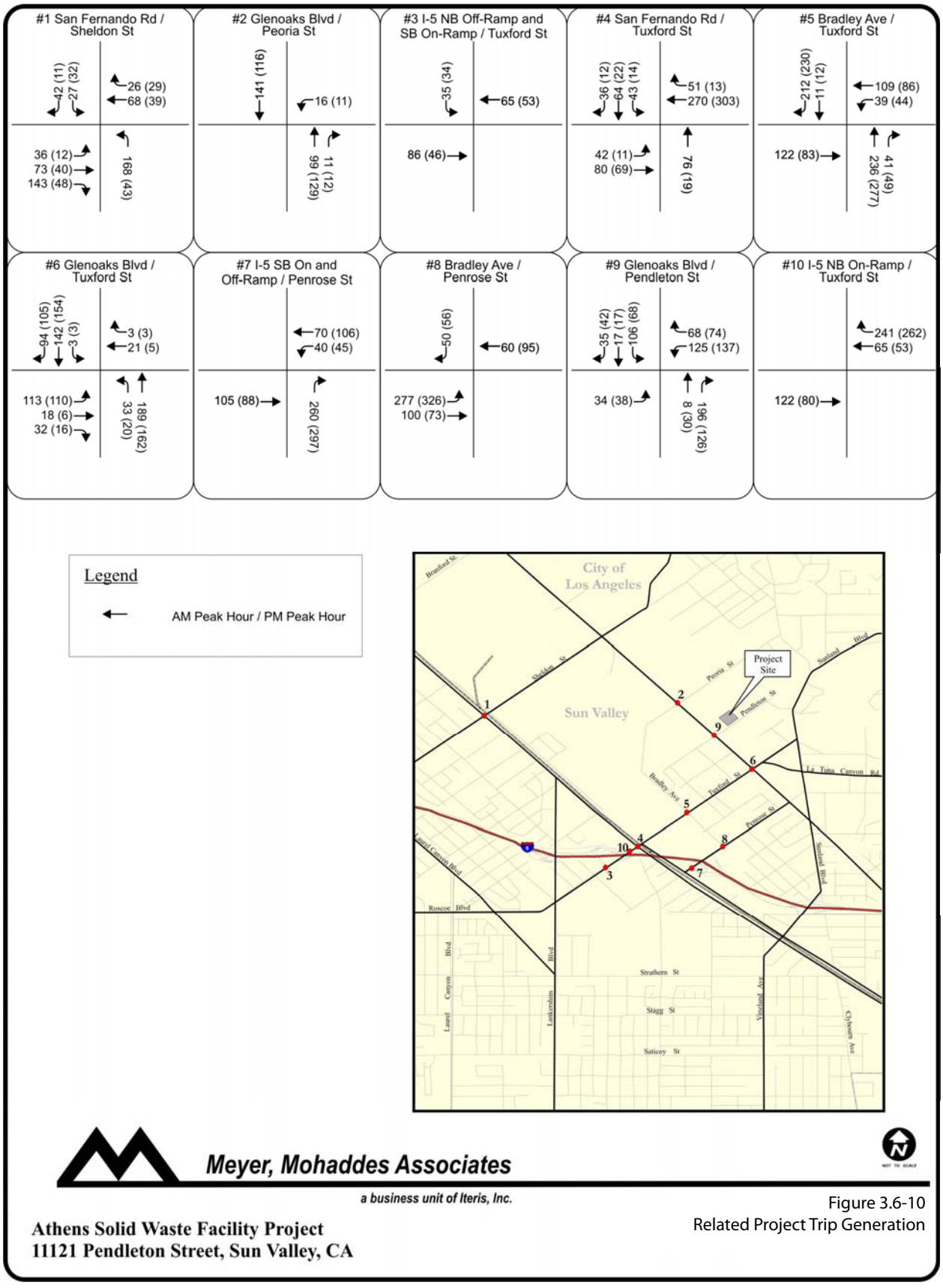

Figure 3.6-10
Related Project Trip Generation

As shown in **Table 3.6-6**, a 7 percent reduction for the Bradley Landfill and Recycling Center mitigation measure for an Advanced Traffic Control System (ATCS) has already been applied at four of the nine study intersections under the 400-tpd baseline, "With" related projects. The 7 percent credit value was used because it has been applied by various jurisdictions throughout southern California for many years in environmental studies, including in the City of Los Angeles. In fact, the City of Los Angeles is now applying a 10 percent credit for adaptive traffic control systems, however, to be conservative for this EIR analysis, only 5 and 7 percent benefit/credit is applied to ensure that mitigation credits conservatively represent expected benefits. The four intersections with the ATCS reduction include:

- San Fernando Road and Sheldon Street
- San Fernando Road and Tuxford Street
- Bradley Avenue and Tuxford Street
- Glenoaks Boulevard and Tuxford Street

The ATCS includes interconnect via new conduit and fiber optic cables, traffic signal detection systems, surveillance cameras, message signs and other means that connect the arterial traffic signal system with the City Hall Traffic Management Center and other potential connections with adjacent jurisdictions. Circulation improvements related to ATCS are listed below.

- Improve traffic signal coordination throughout the system; allow communication between signals, thereby making each intersection part of a system rather than operating in isolation
- Reduce motorist delay and stops at intersections
- Improve overall travel speeds
- Reduce "lost" time at intersections due to inefficient signal timing patterns
- Allow for "real time" monitoring of intersections and roadways to identify and respond to incidents, congestion and malfunctions
- Improve system maintenance
- Allow city staff to adjust signal timing in response to congestion and incidents much faster than today

These intersections include:

- San Fernando Road and Sheldon Street- a.m. Peak Hour
- San Fernando Road and Tuxford Street- a.m. and p.m. Peak Hour
- Bradley Avenue and Tuxford Street- p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street- a.m. Peak Hour
- Interstate 5 SB on/off-ramp and Penrose Street- a.m. and p.m. Peak Hour
- Bradley Avenue and Penrose Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Pendleton Street- p.m. Peak Hour

TABLE 3.6-6
400-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects- Peak Hour LOS Summary

	Intersection	400-tpd Baseline With Ambient Growth Only (No Related Projects)				400-tpd Baseline With Ambient Growth and WITH Related Projects with Bradley Development				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/| Veh	LOS	V/C or Del/ Veh				
1	San Fernando Road and Sheldon Street [a]	C	0.729	C	0.770	D	0.857	C	0.751	0.128	-0.019	YES	NO
2	Glenoaks Boulevard and Peoria Street	A	0.452	A	0.443	A	0.510	A	0.494	0.058	0.051	NO	NO
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	17.2 sec	C	24.0 sec	D	31.3 sec	F	59.3 sec	14.1 sec	35.3 sec	NO	NO
4	San Fernando Road and Tuxford Street [a]	B	0.626	C	0.737	C	0.712	C	0.787	0.086	0.050	YES	YES
5	Bradley Avenue and Tuxford Street [a]	A	0.496	A	0.549	B	0.637	C	0.725	0.141	0.176	NO	YES
6	Glenoaks Boulevard and Tuxford Street [a]	B	0.629	B	0.627	C	0.710	B	0.688	0.081	0.061	YES	NO
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	12.7 sec	B	12.8 sec	C	19.6 sec	D	25.4 sec	6.9 sec	12.6 sec	YES	YES
8	Bradley Avenue and Penrose Street	A	0.530	A	0.430	C	0.788	C	0.748	0.258	0.318	YES	YES
9	Glenoaks Boulevard and Pendleton Street	A	0.480	A	0.508	B	0.637	C	0.730	0.157	0.222	NO	YES

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

TABLE 3.6-7
400-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects- LOS Analysis of Unsignalized Intersections

	Intersection	400-tpd Baseline With Ambient Growth Only (No Related Projects)				400-tpd Baseline With Ambient Growth and WITH Related Projects with Bradley Development				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh				
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [If Signalized]	A	0.469	A	0.546	A	0.524	A	0.589	0.055	0.043	NO	NO
7	Interstate 5 SB on/off-ramp and Penrose Street [If Signalized]	A	0.420	A	0.457	C	0.704	C	0.759	0.284	0.302	YES	YES

Level of service analysis worksheets for the 400-tpd baseline are provided in **Appendix D.** Intersection turning movement volumes and level of service for this baseline are provided in **Figure 3.6-11**.

In addition to the ATCS mitigation measure, the Bradley Landfill and Recycling Center TIA also indicates that two physical mitigation measures are required at the intersections of Bradley Avenue and Tuxford Street and Bradley Avenue and Penrose Street. At Bradley Avenue and Tuxford Street, the mitigation required is to convert the existing east and westbound lane configurations from one left-turn lane, one through lane, and one shared through/right-turn lane to a dedicated left-turn lane, two through lanes, and a dedicated right-turn lane. In addition, the north and southbound configurations would also be converted from a left/through/right-turn lane to one shared through/left-turn lane and one dedicated right-turn lane. At Bradley Avenue and Penrose Street, the existing southbound configuration would be converted from one shared left/through/right-turn lane to one shared through/left-turn lane and one dedicated right-turn lane. If these two physical mitigation measures are implemented per the Bradley Landfill and Recycling Center TIA, a significant impact at Bradley Avenue and Penrose Street would still remain during the a.m. and p.m. peak hour. The resulting mitigated LOS and corresponding V/C ratios are provided below in **Table 3.6-8**.

With the 400-tpd C&D baseline, the addition of traffic from related projects (including the Bradley Development) would result in six significant impacts after the Bradley Landfill and Recycling Center mitigation measures are in place. The remaining significant impacts are located at the following study intersections:

- San Fernando Road and Sheldon Street- a.m. Peak Hour
- San Fernando Road and Tuxford Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street- a.m. Peak Hour
- Interstate-5 Southbound On/Off-Ramps and Penrose Street- a.m. and p.m. Peak Hour
- Bradley Avenue and Penrose Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Pendleton Street- p.m. Peak Hour

TABLE 3.6-8
400-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects - LOS Analysis with Bradley Mitigations

	Intersection	400-tpd Baseline With Ambient Growth Only (No Related Projects)				400-tpd Baseline WITH Related Projects and Bradley Development With Bradley Mitigations				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
5	Bradley Avenue and Tuxford Street[a]	A	0.496	A	0.549	A	0.553	B	0.607	0.057	0.058	NO	NO
8	Bradley Avenue and Penrose Street	A	0.530	A	0.430	C	0.784	C	0.739	0.254	0.309	YES	YES

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

400-tpd Baseline without Bradley

The a.m. and p.m. peak hour level of service analyses were conducted at the nine study intersections based on the methodologies described previously. **Table 3.6-9** summarizes the level of service calculations for the study intersections with all related projects except the Bradley development. It assumes the exiting roadway network is in place in 2008, and excludes all Bradley-related mitigation measures, including the 7 percent ATCS mitigation measure and the physical mitigation measures at Bradley Avenue and Tuxford Street and Bradley Avenue and Penrose Street. This comparison was conducted to reveal significant impacts that are projected to occur as a result of the addition of traffic from related projects, if the ASVMRF processes its existing throughput of 400 tpd of C&D materials without an increase to Project throughput (No-project).

To determine if an unsignalized intersection (stop controlled) had a significant impact as a result of related projects under this baseline, unsignalized intersections were analyzed as signalized intersections using the CMA method for signalized intersections. The same aforementioned threshold of significance criteria was applied, and the results are shown below in **Table 3.6-10**.

The results indicate that seven of the nine study intersections are projected to operate at an acceptable level of service (LOS D or better as a signalized intersection) during the a.m. and p.m. peak hour. Two study intersections are projected to operate at LOS E or F. San Fernando Road and Sheldon Street are projected to operate at LOS E during the a.m. peak hour and Interstate 5 NB off-ramp/SB on-ramp and Tuxford Street is projected to operate at LOS F during the p.m. peak hour. The unsignalized intersections of I-5 northbound off-ramp/ southbound on-ramp and Tuxford Street and I-5 southbound on/off-ramp and Penrose Street are projected to operate at an acceptable level of service when analyzed as signalized intersections. Impacts considered significant are expected to occur at four locations as a result of the addition of traffic from related projects during both the a.m. and p.m. peak hour.

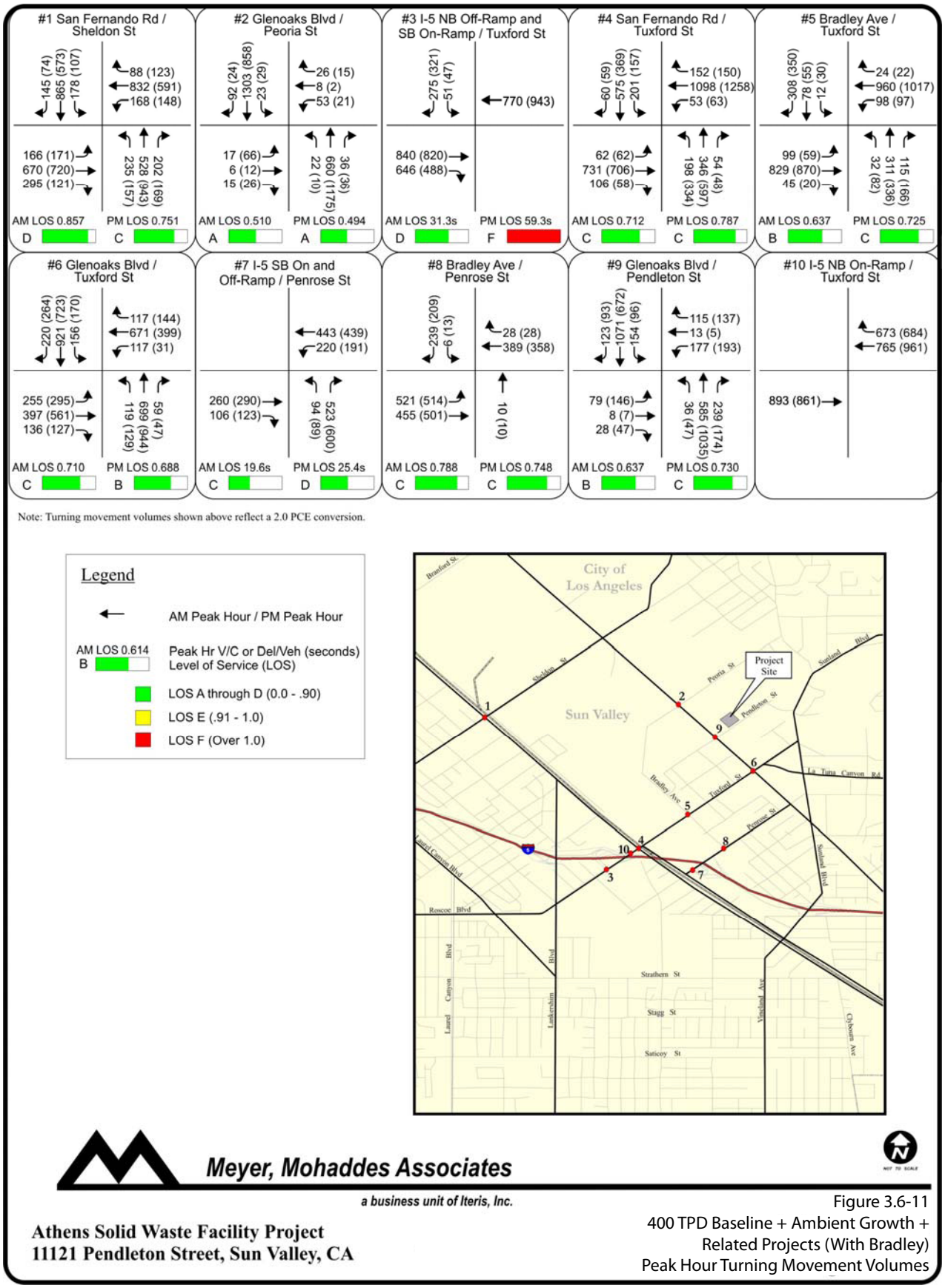

Figure 3.6-11
400 TPD Baseline + Ambient Growth + Related Projects (With Bradley)
Peak Hour Turning Movement Volumes

These intersections include:

- San Fernando Road and Sheldon Street- a.m. and p.m. Peak Hour
- San Fernando Road and Tuxford Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Pendleton Street- p.m. Peak Hour

Level of service analysis worksheets for this baseline are provided in **Appendix D.** Intersection turning movement volumes and level of service for this baseline is provided in **Figure 3.6-12**.

TABLE 3.6-9
400-tpd Baseline + Ambient Growth + Other Related Projects (No Bradley Development) - Peak Hour LOS Summary

	Intersection	400-tpd Baseline With Ambient Growth Only (No Related Projects)				400-tpd Baseline With Ambient Growth and WITH Related Projects without Bradley Development and Mitigations				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
1	San Fernando Road and Sheldon Street [a]	C	0.729	C	0.770	E	0.927	D	0.821	0.198	0.051	YES	YES
2	Glenoaks Boulevard and Peoria Street	A	0.452	A	0.443	A	0.510	A	0.494	0.058	0.051	NO	NO
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	17.2 sec	C	24.0 sec	D	31.3 sec	F	59.3 sec	14.1 sec	35.3 sec	NO	NO
4	San Fernando Road and Tuxford Street [a]	B	0.626	C	0.737	C	0.712	C	0.780	0.086	0.043	YES	YES
5	Bradley Avenue and Tuxford Street [a]	A	0.496	A	0.549	A	0.550	B	0.610	0.054	0.061	NO	NO
6	Glenoaks Boulevard and Tuxford Street [a]	B	0.629	B	0.627	C	0.780	C	0.758	0.151	0.131	YES	YES
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	12.7 sec	B	12.8 sec	C	15.5 sec	C	15.6 sec	2.8 sec	2.8 sec	NO	NO
8	Bradley Avenue and Penrose Street	A	0.530	A	0.430	B	0.624	A	0.555	0.094	0.125	NO	NO
9	Glenoaks Boulevard and Pendleton Street	A	0.480	A	0.508	B	0.637	C	0.730	0.157	0.222	NO	YES

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

TABLE 3.6-10
Alt 1- 400-tpd Baseline+ Ambient Growth + Other Related Projects (No Bradley Development) - LOS Analysis of Unsignalized Intersections

	Intersection	400-tpd Baseline With Ambient Growth Only (No Related Projects)				400-tpd Baseline With Ambient Growth and WITH Related Projects without Bradley Development and Mitigations				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh				
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [If Signalized]	A	0.469	A	0.546	A	0.524	A	0.589	0.055	0.043	NO	NO
7	Interstate 5 SB on/off-ramp and Penrose Street [If Signalized]	A	0.420	A	0.457	A	0.538	A	0.566	0.118	0.109	NO	NO

3.6.3.5 1,500-tpd Baseline Plus Related Projects

This section describes traffic conditions with the 1,500-tpd baseline and then adds traffic generated by ambient growth and related projects.

1,500-tpd Baseline with Bradley

The a.m. and p.m. peak hour level of service analyses were conducted at the nine study intersections based on the methodologies described previously. To determine if an unsignalized intersection (stop controlled) had a significant impact as a result of related projects under the 1,500-tpd baseline, unsignalized intersections were analyzed as signalized intersections using the CMA method for signalized intersections. The same aforementioned threshold of significance criteria was applied.

The same 7 percent ATCS mitigation measure was applied to 1,500-tpd baseline, and the results are shown below in **Tables 3.6-11 and 3.6-12**. This comparison was conducted to reveal significant impacts that are projected to occur as a result of the addition of traffic from related projects (including the Bradley development) if the ASVMRF processes a throughput of 1,500 tpd of materials, as allowed under their Entitlement. The results indicate that with the 7 percent ATCS mitigation, eight of the nine study intersections are projected to operate at an acceptable level of service (LOS D or better as a signalized intersection) during the a.m. and p.m. peak hour. One study intersection, I-5 northbound off-ramp/southbound on-ramp at Tuxford Street is projected to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. The unsignalized intersections of I-5 northbound off-ramp/southbound on-ramp and Tuxford Street and I-5 southbound on/off-ramp and Penrose Street are projected to operate at an acceptable level of service when analyzed as signalized intersections. Impacts considered significant are expected to occur at seven locations as a result of the addition of traffic from related projects with the inclusion of mitigation measures from the Bradley development during the a.m. and p.m. peak hour.

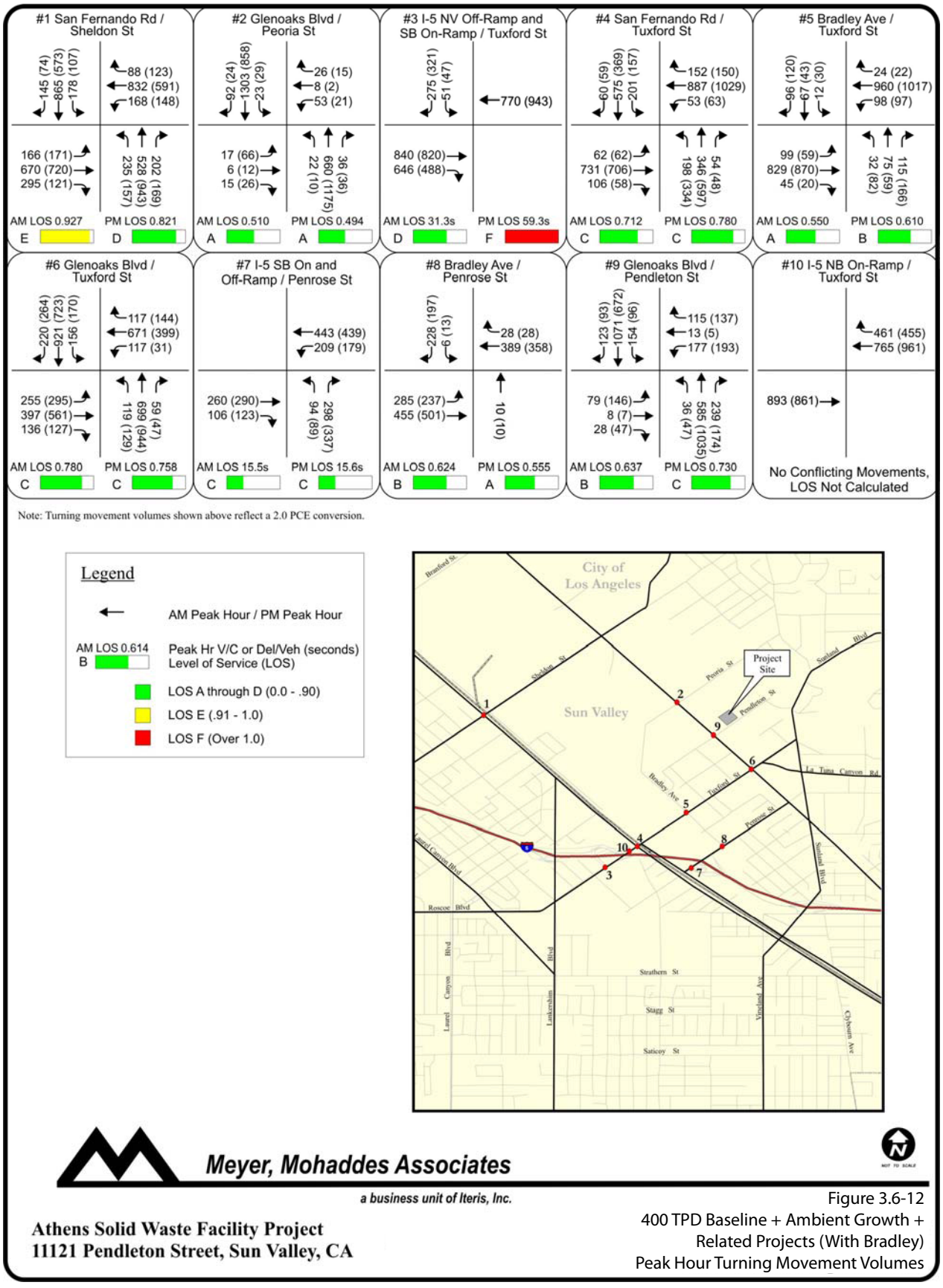

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Figure 3.6-12
400 TPD Baseline + Ambient Growth + Related Projects (With Bradley)
Peak Hour Turning Movement Volumes

These intersections include:

- San Fernando Road and Sheldon Street- a.m. Peak Hour
- San Fernando Road and Tuxford Street- a.m. and p.m. Peak Hour
- Bradley Avenue and Tuxford Street- p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street- a.m. and p.m. Peak Hour
- Interstate 5 SB on/off-ramp and Penrose Street- a.m. and p.m. Peak Hour
- Bradley Avenue and Penrose Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Pendleton Street- p.m. Peak Hour

TABLE 3.6-11
1,500-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects- Peak Hour LOS Summary

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects and Bradley Development				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh				
1	San Fernando Road and Sheldon Street [a]	C	0.733	C	0.787	D	0.858	C	0.767	0.125	-0.020	YES	NO
2	Glenoaks Boulevard and Peoria Street	A	0.460	A	0.453	A	0.518	A	0.503	0.058	0.050	NO	NO
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	19.8 sec	D	33.4 sec	E	40.2 sec	F	93.1 sec	20.4 sec	59.7 sec	NO	NO
4	San Fernando Road and Tuxford Street [a]	B	0.629	C	0.744	C	0.715	C	0.794	0.086	0.050	YES	YES
5	Bradley Avenue and Tuxford Street [a]	A	0.506	A	0.578	B	0.657	C	0.752	0.151	0.174	NO	YES
6	Glenoaks Boulevard and Tuxford Street [a]	B	0.661	B	0.673	C	0.743	C	0.734	0.082	0.061	YES	YES
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	13.0 sec	B	13.4 sec	C	20.9 sec	D	29.1 sec	7.9 sec	15.7 sec	YES	YES

TABLE 3.6-11
1,500-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects- Peak Hour LOS Summary

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects and Bradley Development				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh				
8	Bradley Avenue and Penrose Street	A	0.556	A	0.473	D	0.814	C	0.791	0.258	0.318	YES	YES
9	Glenoaks Boulevard and Pendleton Street	A	0.509	A	0.598	B	0.666	D	0.819	0.157	0.221	NO	YES

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

TABLE 3.6-12
1,500-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects- LOS Analysis of Unsignalized Intersections

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects and Bradley Development				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh				
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [If Signalized]	A	0.480	A	0.560	A	0.536	B	0.603	0.056	0.043	NO	NO
7	Interstate 5 SB on/off-ramp and Penrose Street [If Signalized]	A	0.442	A	0.492	C	0.727	C	0.793	0.285	0.301	YES	YES

In addition to the ATCS mitigation measure, the Bradley Landfill and Recycling Center TIA also indicates that two physical mitigation measures are required at the intersections of Bradley Avenue and Tuxford Street and Bradley Avenue and Penrose Street. At Bradley Avenue and Tuxford Street, the mitigation required is to convert the existing east and westbound lane configurations from one left-turn lane, one through lane, and one shared

through/right-turn lane to a dedicated left-turn lane, two through lanes, and a dedicated right-turn lane. In addition, the north and southbound configurations would also be converted from a left/through/right-turn lane to one shared through/left-turn lane and one dedicated right-turn lane. At Bradley Avenue and Penrose Street, the existing southbound configuration would be converted from one shared left/through/right-turn lane to one shared through/left-turn lane and one dedicated right-turn lane. If these two physical mitigation measures are implemented per the Bradley Landfill and Recycling Center TIA, a significant impact at Bradley Avenue and Penrose Street would still remain during the a.m. peak hour. The resulting mitigated LOS and corresponding V/C ratios are provided below in **Table 3.6-13**.

TABLE 3.6-13
1,500-tpd Baseline + Ambient Growth + Bradley Development + Other Related Projects - LOS Analysis with Bradley Mitigations

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects and Bradley Development With Bradley Mitigations				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh				
5	Bradley Avenue and Tuxford Street [a]	A	0.506	A	0.578	A	0.556	B	0.612	0.05	0.034	NO	NO
8	Bradley Avenue and Penrose Street	A	0.556	A	0.473	D	0.810	C	0.783	0.254	0.310	YES	NO

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

With the 1,500-tpd baseline, the addition of traffic from related projects would result in six significant impacts after the Bradley Landfill and Recycling Center mitigation measures are in place. The remaining significant impacts are located at the following study intersections:

- San Fernando Road and Sheldon Street – a.m. Peak Hour
- San Fernando Road and Tuxford Street – a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street – a.m. and p.m. Peak Hour
- Interstate-5 Southbound On/Off-Ramps and Penrose Street – a.m. and p.m. Peak Hour
- Bradley Avenue and Penrose Street – a.m. Peak Hour
  Glenoaks Boulevard and Pendleton Street – p.m. Peak Hour

Level of service analysis worksheets for the 1,500-tpd baseline are provided in **Appendix D.** Intersection turning movement volumes and level of service at the nine study intersections

for this baseline are shown in **Figure 3.6-13** with ambient growth only, and **Figure 3.6-14** with ambient growth and related projects (With Bradley).

1,500-tpd Baseline without Bradley

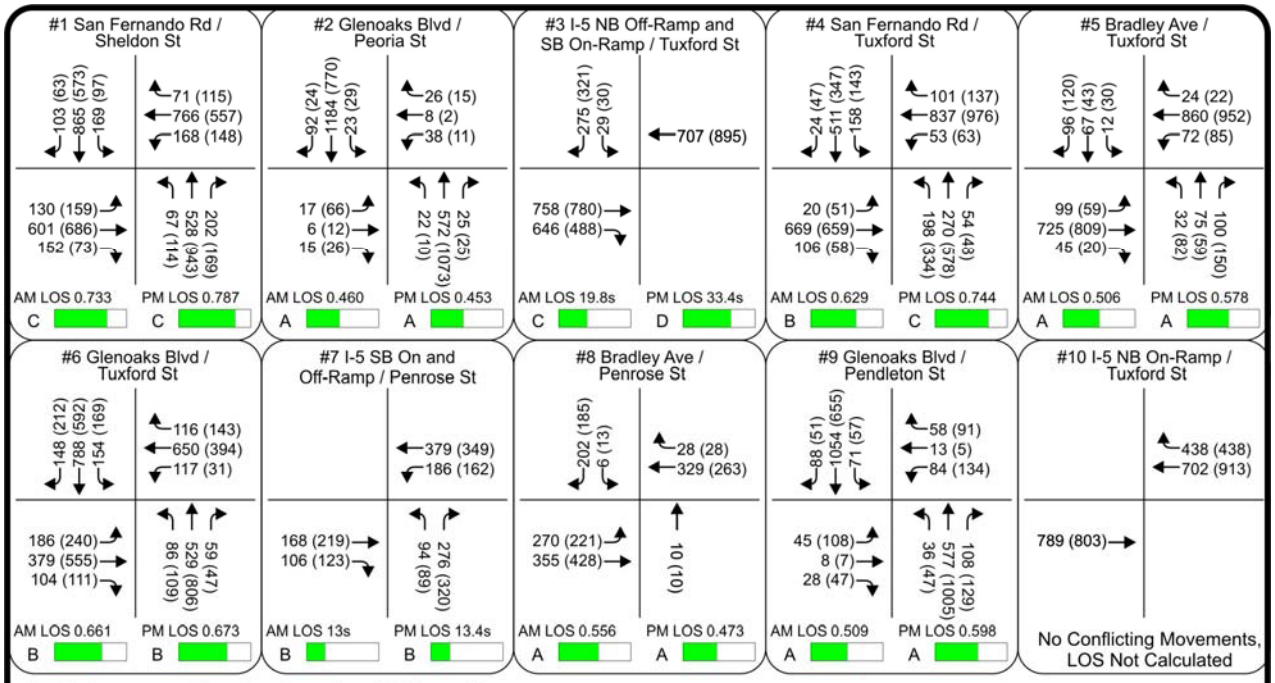
The a.m. and p.m. peak hour level of service analyses were conducted at the nine study intersections based on the methodologies described previously. **Table 3.6-14** summarizes the level of service calculations for the study intersections under the 1,500-tpd baseline, with all related projects except the Bradley development. This scenario does not include the associated Bradley mitigation measures. This comparison was conducted to reveal significant impacts that are projected to occur as a result of the addition of traffic from related projects (without the Bradley development), if the ASVMRF processes its existing throughput of 1,500 tpd of materials, as allowed under their Entitlement.

To determine if an unsignalized intersection (stop controlled) had a significant impact as a result of related projects under the 1,500-tpd baseline, unsignalized intersections were analyzed as signalized intersections using the CMA method for signalized intersections. The same aforementioned threshold of significance criteria was applied, and the results are shown below in **Table 3.6-15**.

The results indicate that seven of the nine study intersections are projected to operate at an acceptable level of service (LOS D or better as a signalized intersection) during the a.m. and p.m. peak hour. Two study intersections are projected to operate at LOS E or F. San Fernando Road and Sheldon Street is projected to operate at LOS E during the a.m. peak hour and Interstate 5 NB off-ramp/SB on-ramp and Tuxford Street is projected to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. The unsignalized intersections of I-5 northbound off-ramp/ southbound on-ramp and Tuxford Street and I-5 southbound on/off-ramp and Penrose Street are projected to operate at an acceptable level of service when analyzed as signalized intersections. Impacts considered significant are expected to occur at four locations as a result of the addition of traffic from related projects (without the Bradley development) without the inclusion of Bradley mitigation measures during both the a.m. and p.m. peak hour. These intersections include:

- San Fernando Road and Sheldon Street- a.m. and p.m. Peak Hour
- San Fernando Road and Tuxford Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Tuxford Street- a.m. and p.m. Peak Hour
- Glenoaks Boulevard and Pendleton Street- p.m. Peak Hour

Level of service analysis worksheets for the 1,500-tpd baseline are provided in **Appendix D.** Intersection turning movement volumes and level of service for this baseline is provided in **Figure 3.6-15**.



Note: Turning movement volumes shown above reflect a 2.0 PCE conversion.

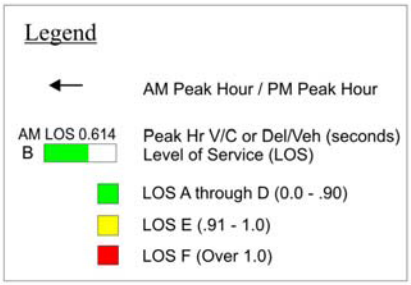


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Figure 3.6-13
1,500 TPD Baseline
Peak Hour Turning Movement Volumes-Ambient Growth Only

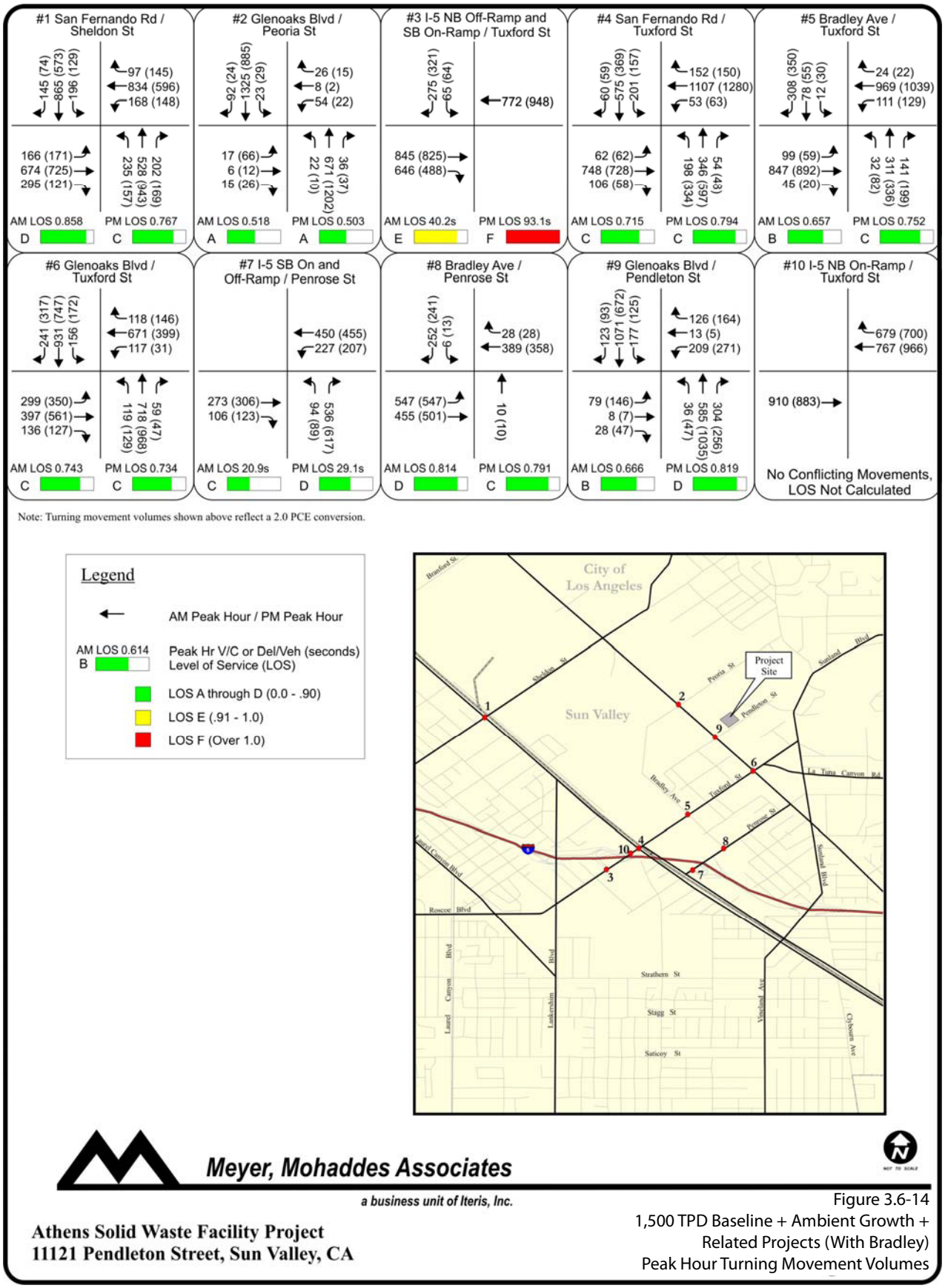
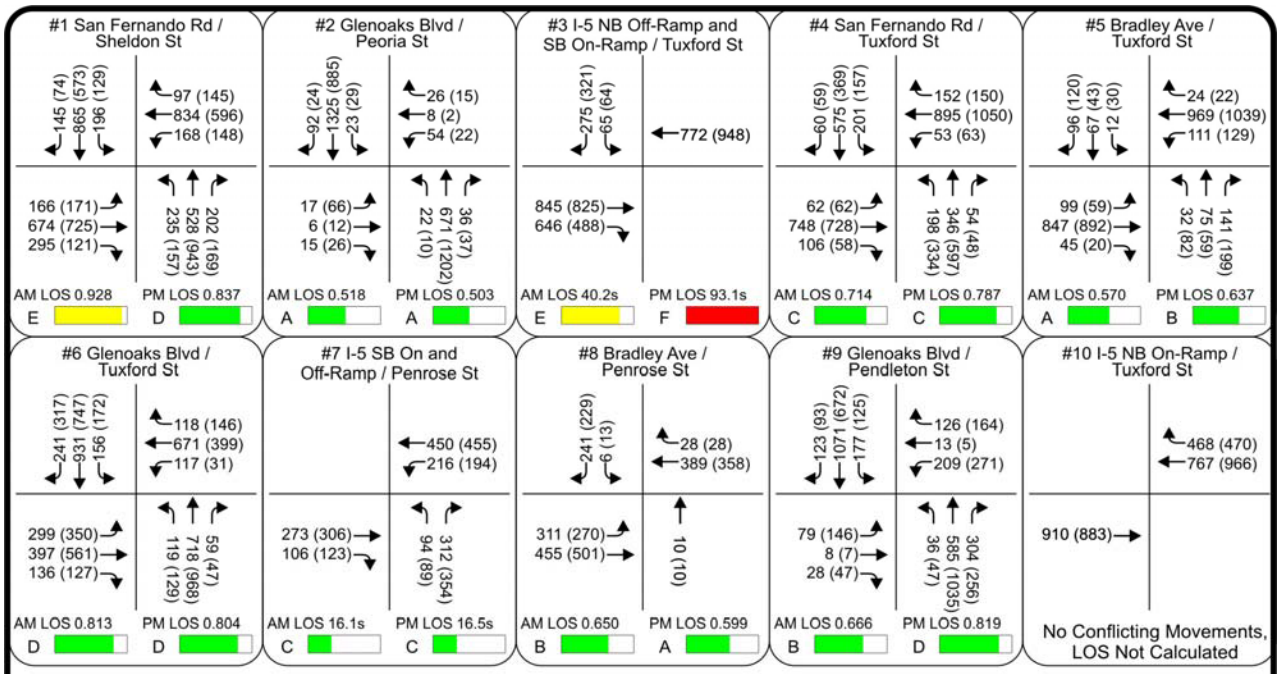


Figure 3.6-14
1,500 TPD Baseline + Ambient Growth + Related Projects (With Bradley)
Peak Hour Turning Movement Volumes



Note: Turning movement volumes shown above reflect a 2.0 PCE conversion.

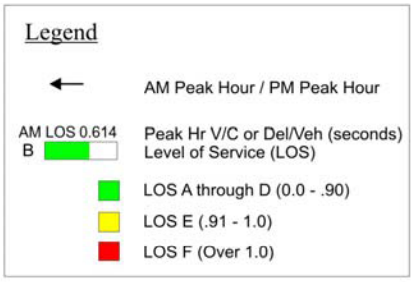


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Figure 3.6-15
1,500 TPD Baseline + Ambient Growth + Related Projects (Without Bradley)
Peak Hour Turning Movement Volumes

TABLE 3.6-14
1,500-tpd baseline + Ambient Growth + Other Related Projects (No Bradley Development) - Peak Hour LOS Summary

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects (No Bradley Development)				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
		LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
1	San Fernando Road and Sheldon Street [a]	C	0.733	C	0.787	E	0.928	D	0.837	0.195	0.050	YES	YES
2	Glenoaks Boulevard and Peoria Street	A	0.460	A	0.453	A	0.518	A	0.503	0.058	0.050	NO	NO
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Unsig]	C	19.8 sec	D	33.4 sec	E	40.2 sec	F	93.1 sec	20.4 sec	59.7 sec	NO	NO
4	San Fernando Road and Tuxford Street [a]	B	0.629	C	0.744	C	0.714	C	0.787	0.085	0.043	YES	YES
5	Bradley Avenue and Tuxford Street [a]	A	0.506	A	0.578	A	0.570	B	0.637	0.064	0.059	NO	NO
6	Glenoaks Boulevard and Tuxford Street [a]	B	0.661	B	0.673	D	0.813	D	0.804	0.152	0.131	YES	YES
7	Interstate 5 SB on/off-ramp and Penrose Street [Unsig]	B	13.0 sec	B	13.4 sec	C	16.1 sec	C	16.5 sec	3.1 sec	3.1 sec	NO	NO
8	Bradley Avenue and Penrose Street	A	0.556	A	0.473	B	0.650	A	0.599	0.094	0.126	NO	NO
9	Glenoaks Boulevard and Pendleton Street	A	0.509	A	0.598	B	0.666	D	0.819	0.157	0.221	NO	YES

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

TABLE 3.6-15
1,500-tpd Baseline + Ambient Growth + Other Related Projects (No Bradley Development) – LOS Analysis of Unsignalized Intersections

	Intersection	1,500-tpd Baseline Ambient Growth Only (No Related Projects)				1,500-tpd Baseline WITH Related Projects (No Bradley Development)				Related Project Increase in V/C or Del/Veh		Significant Impact Due to Related Projects	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour					
		LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [If Signalized]	A	0.480	A	0.560	A	0.536	B	0.603	0.056	0.043	NO	NO
7	Interstate 5 SB on/off-ramp and Penrose Street [If Signalized]	A	0.442	A	0.492	A	0.562	A	0.599	0.120	0.107	NO	NO

3.6.3.6 Project Trip Generation

Trip generation rates for the future with Project were derived from data provided by Athens Services and compared with rates from other traffic studies for similar projects. All trip generation rates were converted to PCE using the methodology previously described. The results are shown in **Table 3.6-16**.

TABLE 3.6-16
Project Trip Generation Rates

	Trips Ends Generated					
	Weekday A.M.			Weekday P.M.		
	In	Out	Total	In	Out	Total
Future With Project 500-tpd C&D + 1,000-tpd MSW	37	21	**58**	28	27	**55**

Source: Athens Services

Note: The trip generation rates used for the LOS analysis are different from the raw trip generation numbers shown above. Trip generation rates used in the LOS analysis utilize a passenger car equivalent (PCE) of 2.0 (1 truck = 2 collection vehicles).

Impact TR-1: Project Impacts (400-tpd C&D Baseline) (Less than Significant)

This impact analysis compares conditions resulting from the 400-tpd baseline with the Project (500 tpd of C&D materials and 1,000 tpd of MSW).

The a.m. and p.m. peak hour level of service analyses were conducted at the nine study intersections based on the methodologies described previously. Intersection turning movement volumes and level of service for the Project are shown in **Figure 3.6-16**.

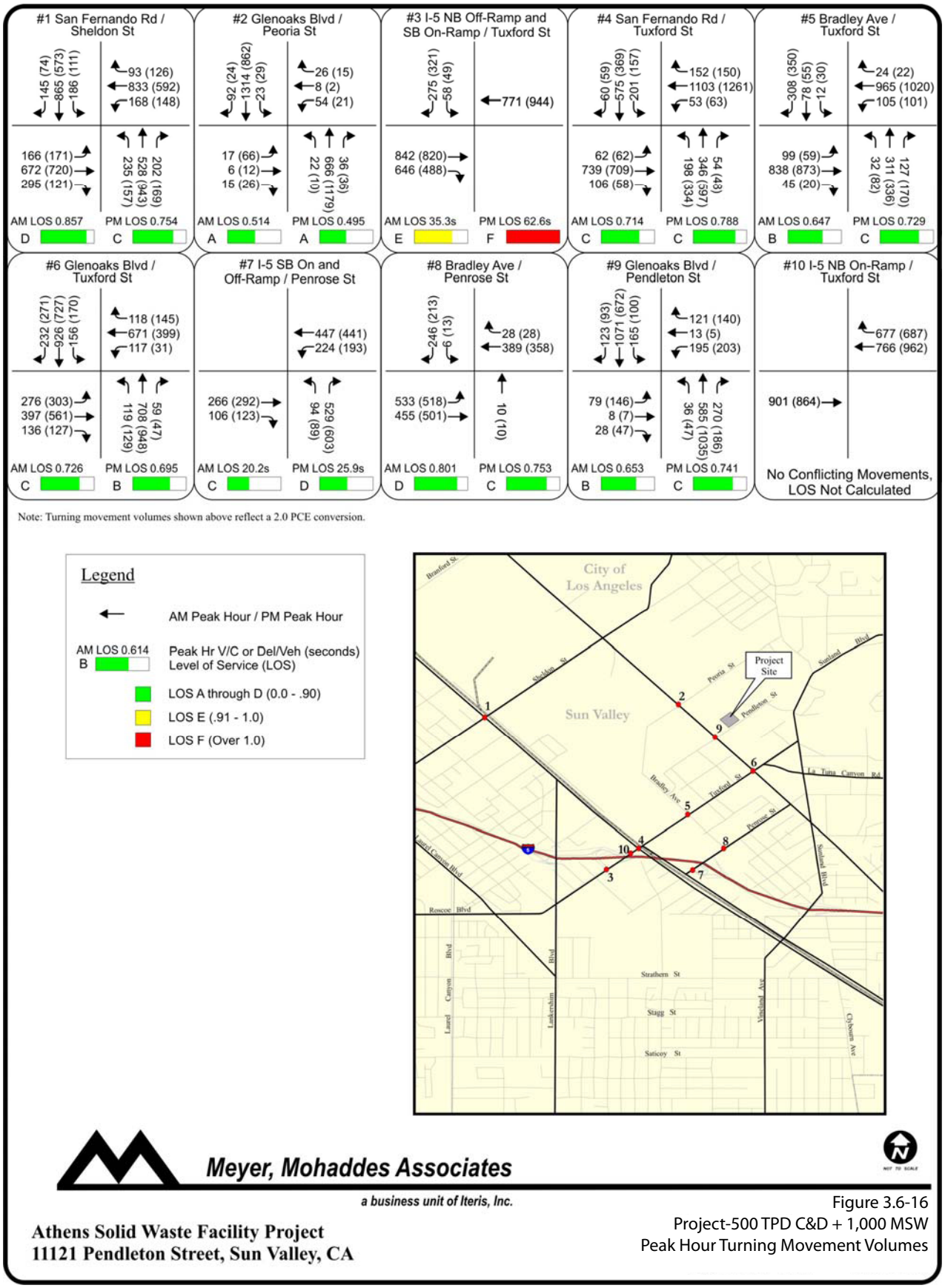

Figure 3.6-16
Project-500 TPD C&D + 1,000 MSW
Peak Hour Turning Movement Volumes

Table 3.6-17 summarizes the level of service calculations for the study intersections when the project is compared to the 400-tpd baseline with the Bradley project, during the a.m. and p.m. peak hours. The results indicate that eight study intersections are projected to operate at acceptable levels of service during both the a.m. and p.m. peak hour. One study intersection, I-5 northbound off-ramp/southbound on-ramp at Tuxford Street is projected to operate at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. Based on the LADOT threshold,, the evaluation of whether an unsignalized intersection would have a significant impact requires analysis as if it were signalized. Based on this analysis, the unsignalized intersections of I-5 northbound off-ramp/ southbound on-ramp and Tuxford Street and I-5 southbound on/off-ramp and Penrose Street are projected to operate at an acceptable level of service when analyzed as signalized intersections. There are no projected significant Project-related traffic impacts based on LADOT thresholds of significant impacts when the project is assessed in terms of the 400-tpd baseline.

TABLE 3.6-17
Project (500 tpd C&D + 1,000 tpd MSW) vs. 400-tpd Baseline - Peak Hour LOS Summary

	Intersection	400-tpd Baseline + Related Projects				Project (500 tpd C&D + 1,000 tpd MSW) With Bradley				Project Increase in V/C		Significant Impact	
		A.M. Peak Hr		P.M. Peak Hr		A.M. Peak Hr		P.M. Peak Hr					
		LOS	V/C or Del/ Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
1	San Fernando Road and Sheldon Street [a]	D	0.857	C	0.751	D	0.857	C	0.754	0.000	0.003	NO	NO
2	Glenoaks Boulevard and Peoria Street	A	0.510	A	0.494	A	0.514	A	0.495	0.004	0.001	NO	NO
3	I- 5 NB off / SB on-ramp and Tuxford St [Unsig]	D	31.3 sec	F	59.3 sec	E	35.3 sec	F	62.6 sec	4.0 sec	3.3 sec	NO	NO
4	San Fernando Road and Tuxford Street [a]	C	0.712	C	0.787	C	0.714	C	0.788	0.002	0.001	NO	NO
5	Bradley Avenue and Tuxford Street [a]	B	0.637	C	0.725	B	0.647	C	0.729	0.010	0.004	NO	NO
6	Glenoaks Boulevard and Tuxford Street [a]	C	0.710	B	0.688	C	0.726	B	0.695	0.016	0.007	NO	NO
7	I- 5 SB on/off-ramp and Penrose St [Unsig]	C	19.6 sec	D	25.4 sec	C	20.2 sec	D	25.9 sec	0.6 sec	0.5 sec	NO	NO
8	Bradley Avenue and Penrose Street	C	0.788	C	0.748	D	0.801	C	0.753	0.013	0.005	NO	NO
9	Glenoaks Boulevard and Pendleton Street	B	0.637	C	0.730	B	0.653	C	0.741	0.016	0.011	NO	NO

TABLE 3.6-17
Project (500 tpd C&D + 1,000 tpd MSW) vs. 400-tpd Baseline - Peak Hour LOS Summary

	Intersection	400-tpd Baseline + Related Projects				Project (500 tpd C&D + 1,000 tpd MSW) With Bradley				Project Increase in V/C		Significant Impact	
		A.M. Peak Hr		P.M. Peak Hr		A.M. Peak Hr		P.M. Peak Hr					
		LOS	V/C or Del/ Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/ Veh	LOS	V/C or Del/ Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
	Unsignalized Intersections Converted to Signalized to Calculate Significance Threshold												
3	I-5 NB off / SB on-ramp and Tuxford St [Sig]	A	0.524	A	0.589	A	0.530	A	0.591	0.006	0.002	NO	NO
7	I- 5 SB on/off-ramp and Penrose St [Sig]	C	0.704	C	0.759	C	0.715	C	0.764	0.011	0.005	NO	NO

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

In considering project impacts without the Bradley project, project trip generation compared to the 400-tpd baseline would be more than under baseline conditions yet there would not be significant impacts at any of the study intersections. Traffic from related projects (except Bradley) would occur under this scenario. Based on the traffic analysis in the Bradley Draft EIR, traffic from the Bradley project is substantial and has significant impacts on surrounding intersections requiring mitigation. Without traffic from the Bradley project there are fewer trips on the surrounding roadways and no significant impacts from the Athens project when compared to the 400-tpd baseline without Bradley.

Mitigation Measures: No mitigation is required.

Residual Impact: Impact would be less than significant.

Impact TR-2: Project Impact (1,500-tpd C&D Baseline) (Less than significant)

Table 3.6-18 summarizes the level of service calculations for the Project compared to the 1,500-tpd baseline with the Bradley project. The results indicate that there are no projected significant Project-related traffic impacts based on LADOT thresholds of significant impacts. Level of service analysis worksheets for this analysis are provided in Appendix D. The results shown in Table 3.6-18 assume that the Bradley project will be built. Because the project generates 40 to 60 percent less project trips than with the 1,500-tpd baseline, the project will also not result in significant impact without the Bradley Project.

Mitigation Measures: No mitigation is required.

Residual Impact: Impact would be less than significant.

TABLE 3.6-18
Project (500-tpd C&D + 1,000 tpd MSW) vs. 1,500-tpd Baseline - Peak Hour LOS Summary

	Intersection	1,500-tpd Baseline + Related Projects				Project (500 tpd C&D + 1,000 tpd MSW) With Bradley				Project Increase in V/C		Significant Impact	
		A.M. Peak Hr		P.M. Peak Hr		A.M. Peak Hr		P.M. Peak Hr					
		LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	LOS	V/C or Del/Veh	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
1	San Fernando Road and Sheldon Street [a]	D	0.858	C	0.767	D	0.857	C	0.754	N/C	N/C	NO	NO
2	Glenoaks Boulevard and Peoria Street	A	0.518	A	0.503	A	0.514	A	0.495	N/C	N/C	NO	NO
3	I- 5 NB off / SB on-ramp and Tuxford St [Unsig]	E	40.2 sec	F	93.1 sec	E	35.3 sec	F	62.6 sec	N/C	N/C	NO	NO
4	San Fernando Road and Tuxford Street [a]	C	0.715	C	0.794	C	0.714	C	0.788	N/C	N/C	NO	NO
5	Bradley Avenue and Tuxford Street [a]	B	0.657	C	0.752	B	0.647	C	0.729	N/C	N/C	NO	NO
6	Glenoaks Boulevard and Tuxford Street [a]	C	0.743	C	0.734	C	0.726	B	0.695	N/C	N/C	NO	NO
7	I- 5 SB on/off-ramp and Penrose St [Unsig]	C	20.9 sec	D	29.1 sec	C	20.2 sec	D	25.9 sec	N/C	N/C	NO	NO
8	Bradley Avenue and Penrose Street	D	0.814	C	0.791	D	0.801	C	0.753	N/C	N/C	NO	NO
9	Glenoaks Boulevard and Pendleton Street	B	0.666	D	0.819	B	0.653	C	0.741	N/C	N/C	NO	NO
	Unsignalized Intersections Converted to Signalized to Calculate Significance Threshold												
3	Interstate 5 NB off / SB on-ramp and Tuxford Street [Sig]	A	0.536	B	0.603	A	0.530	A	0.591	N/C	N/C	NO	NO
7	I- 5 SB on/off-ramp and Penrose St [Sig]	C	0.727	C	0.793	C	0.715	C	0.764	N/C	N/C	NO	NO

[a] Reduction of 7 Percent Applied for Adaptive Traffic Control System (ATCS) Mitigation Measure identified in the Bradley Landfill and Recycling Center Traffic Impact Analysis

Note: N/C = No Change

Impact TR-3: The Congestion Management Plan Impact (Less Than Significant)

The Congestion Management Program (CMP) was created statewide as a result of Proposition 111 and has been implemented locally by the Los Angeles County Metropolitan Transportation Authority (Metro). The CMP for Los Angeles County requires that the traffic impact of individual development projects of potential regional significance be analyzed. A specific system of arterial roadways plus all freeways comprise the CMP system. A total of 164 intersections are identified for monitoring on the system in Los Angeles County. This section describes the analysis of Project-related impacts on the CMP system. The analysis has been conducted according to the guidelines set forth in the 2004 Congestion Management Program for Los Angeles County. In accordance with LADOT Traffic Study Policies and Procedures, Caltrans was contacted to identify locations to be evaluated on the state highway system. Per CMP Guidelines, the analysis includes freeway links where the project would add 150 or more peak hour trips to a freeway.

According to the CMP Traffic Impact Analysis (TIA) Guidelines developed by the MTA, a traffic impact analysis is required given the following conditions:

- CMP arterial monitoring intersections, including freeway on- or off-ramps, where the Project would add 50 or more trips during either the a.m. or p.m. weekday peak hours
- CMP freeway monitoring locations where the Project would add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hours

None of the proposed study area intersections are part of the 164-CMP arterial monitoring locations. The closest arterial monitoring station to the Project is located at Victory Boulevard and Woodman Avenue, approximately 4 miles from the Project site. It is projected that the Project will not add more than 50 trips at this CMP arterial monitoring station during the a.m. or p.m. peak hour. Therefore, no CMP intersection analysis was conducted in this traffic study report.

The focus of this analysis is to determine whether Project-related trips would significantly impact the freeway system according to CMP guidelines and threshold of significance. For purposes of analyzing the mainline freeway impact of the Project, the nearest freeway monitoring stations located at I-5 north of Route 170 (Osborne Street), I-5 at Burbank Boulevard, and Route 170 south of Sherman Way were evaluated. It is projected that the Project will not add 150 or more trips to any of the three CMP mainline freeway segments; therefore no further CMP analysis is required.

Table 3.6-19 summarizes the Project's percentage contribution to a.m. and p.m. peak hour intersection traffic volumes based on the 1,500-tpd baseline.

TABLE 3.6-19
Project Share Percentage Contribution

A.M.	Northbound			Southbound			Eastbound			Westbound			Intersection Total
	L	T	R	L	T	R	L	T	R	L	T	R	
#1 San Fernando Rd / Sheldon St	0%	0%	0%	10%	0%	0%	0%	1%	0%	0%	0%	10%	0.75%
#2 Glenoaks Blvd / Peoria St	0%	2%	0%	0%	2%	0%	0%	0%	0%	2%	0%	0%	1.50%
#3 I-5 Northbound Off-Ramp and Southbound On-Ramp / Tuxford St	0%	0%	0%	25%	0%	0%	0%	0%	0%	0%	0%	0%	0.74%
#4 San Fernando Rd / Tuxford St	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	1%	0%	0.74%
#5 Bradley Ave / Tuxford St	0%	0%	23%	0%	0%	0%	0%	2%	0%	13%	1%	0%	2.27%
#6 Glenoaks Blvd / Tuxford St	0%	3%	0%	1%	1%	10%	17%	0%	0%	0%	0%	2%	2.51%
#7 I-5 Southbound On and Off-Ramp / Penrose St	0%	0%	2%	0%	0%	0%	0%	5%	0%	3%	1%	0%	2.31%
#8 Bradley Ave / Penrose St	0%	0%	0%	0%	0%	5%	5%	0%	0%	0%	0%	0%	2.37%
#9 Glenoaks Blvd / Pendleton St	0%	0%	27%	15%	0%	0%	0%	0%	0%	18%	0%	10%	4.98%
#10 I-5 Northbound On-Ramp / Tuxford St	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	0%	1%	1.12%
#1 San Fernando Rd / Sheldon St	0%	0%	0%	21%	0%	0%	0%	1%	0%	0%	1%	17%	1.39%
#2 Glenoaks Blvd / Peoria St	0%	2%	3%	0%	3%	0%	0%	0%	0%	5%	0%	0%	2.51%
#3 I-5 Northbound Off-Ramp and Southbound On-Ramp / Tuxford St	0%	0%	0%	36%	0%	0%	0%	1%	0%	0%	1%	0%	1.07%
#4 San Fernando Rd / Tuxford St	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	2%	0%	1.11%
#5 Bradley Ave / Tuxford St	0%	0%	20%	0%	0%	0%	0%	3%	0%	33%	2%	0%	3.48%
#6 Glenoaks Blvd / Tuxford St	0%	3%	0%	1%	3%	20%	19%	0%	0%	0%	0%	1%	4.15%
#7 I-5 Southbound On and Off-Ramp / Penrose St	0%	0%	3%	0%	0%	0%	0%	6%	0%	8%	4%	0%	3.81%
#8 Bradley Ave / Penrose St	0%	0%	0%	0%	0%	15%	6%	0%	0%	0%	0%	0%	3.98%
#9 Glenoaks Blvd / Pendleton St	0%	0%	47%	30%	0%	0%	0%	0%	0%	40%	0%	20%	8.14%
#10 I-5 Northbound On-Ramp / Tuxford St	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	1%	2%	1.72%

Mitigation Measures: No mitigation is required.

Residual Impact: Impact would be less than significant.

3.6.4 Cumulative Impacts

3.6.4.1 Relationship to Related Projects

The analysis above assesses traffic impacts from anticipated ambient growth in the Project area and related Projects. **Tables 3.6-6 through 3.6-15** identify a series of unavoidable cumulative a.m. and p.m. traffic at various Project-area intersections under both baseline conditions (400-tpd and 1,500-tpd) and with and without the Bradley project. However, it should be noted that this Project's contribution to such identified cumulative impacts are minimal. As shown in Tables 3.6-17 and 3.6-18, Project based traffic impacts under either baseline scenario would be less than significant. Additionally, as identified in Table 3.6-18, under the 1,500-tpd baseline the project actually reduces impacts at each of the intersections studied. Under the 400-tpd baseline, the impact is minimal, as shown in Table 3.6-17, where the greatest increase in V/C at the most impacted intersection is half the increase considered significant.

3.6.4.2 Relationship to Projections/Plans

The Project is an expansion of an industrial use on a Project site that was planned and zoned for industrial use when the Community Plan for this area was adopted. Since the Community Plan assumes the same use for the site as proposed herein, the Project is consistent with the Community Plan and does not result in a significant cumulative impact.

3.6.5 References

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

3.7 Effects Found Not To Be Significant

3.7.1 Introduction

Section 15128 of the CEQA Guidelines requires that an EIR contain statements indicating why various impacts are not considered significant. These statements are often included in initial studies prepared in accordance with Section 15063 of the CEQA Guidelines. Because an initial study was not prepared for this EIR, this section of the EIR indicates why certain impacts of the Project are not considered significant.

3.7.2 Agricultural Resources

The Project site is located in an industrialized area of the City of Los Angeles. No active agricultural fields or agricultural lands are located on or near the Project site. The Project site has not been zoned for agricultural uses, and is not labeled convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or in conflict with the Williamson Act. Therefore, no impacts on protected agricultural resources are anticipated from the Project, regardless of which baseline is used.

3.7.3 Biological Resources

3.7.3.1 Special-status Species

Based on a site reconnaissance survey conducted by a qualified biologist, there are no native habitat types on the Project site and the vegetation present consists of non-native ornamental trees and shrubs.[1] The Verdugo Hills, which are a part of the Transverse Ranges, are located just east of the Project site. The Project site is cut off from the Verdugo Hills by development and roadways, and has been improved by the onsite development that currently exists at the Project site. A California Natural Diversity Database (CNDDB) search was performed for the Burbank 7.5-minute quadrangle, which contains the subject property, and the eight adjacent quadrangles (San Fernando, Sunland, Condor Peak, Pasadena, Los Angeles, Hollywood, Beverly Hills, and Van Nuys) (CDFG, 2006). The CNDDB is a database that inventories the location of rare plants and animals in California and is maintained and updated by the California Department of Fish and Game (CDFG). The results of this search are summarized in **Table 3.7-1**, which provides a list of the sensitive species and natural communities tracked by the CNDDB for the various quadrangles; each species status with the U.S. Fish and Wildlife Service (USFWS), CDFG, and the California Native Plant Society (CNPS); the likelihood of occurrence at the Project site; and comments about habitat and why each species might or might not be present at the site (CDFG, CNDD, 2006; USGS, 1966).

[1] Information based on reconnaissance survey performed by an ESA Biologist on May 24, 2006.

TABLE 3.7-1
Special-status Species Information for the Subject Property

Species/Natural Communities	Special Status	Likelihood of Occurrence	Comments
Animals			
Polioptila californica californica coastal California gnatcatcher	FT, SC	None	Prefers open sage scrub with California sagebrush (*Artemisia californica*) as a dominant or co-dominant species.
Empidonax traillii extimus southwestern willow flycatcher	FE, SE	None	Requires riparian habitat, typically willow-cottonwood thickets.
Rana muscosa mountain yellow-legged frog	FE, SC	None	Highly aquatic frogs, occupying rocky and shaded streams with cool waters originating from springs and snowmelt in the mountains.
Catostomus santaanae Santa Ana sucker	FT, SC	None	Requires perennial streams and is found in the Santa Ana River.
Coccyzus americanus occidentalis western yellow-billed cuckoo	FC, SE	None	Prefers open woodlands with clearings and a dense shrub layer. They are often found in woodlands near streams, rivers, or lakes.
Vireo bellii pusillus least Bell's vireo	FE, SE	None	Requires riparian habitat.
Plants			
Dithyrea maritime beach spectaclepod	ST, 1B	None	Associated with coastal dune complexes.
Astragalus pycnostachyus var. *lanosissimus* Ventura Marsh milk-vetch	FE, SE, 1B	None	Associated with coastal salt marshes.
Astragalus tener var. *Titi* coastal dunes milk-vetch	FE, SE, 1B	None	Associated with coastal dune complexes.
Cordylanthus maritimus ssp. *Maritimus* salt marsh bird's-beak	FE, SE, 1B	None	Associated with coastal salt marshes.
Berberis nevinii Nevin's barberry	FE, SE, 1B	None	Found in sandy and gravelly places, washes, coastal sage scrub, and chaparral.
Chorizanthe parryi var. *fernandina* San Fernando Valley spineflower	FC, SE, 1B	None	Found in native coastal sage scrub within the San Fernando Valley area.

TABLE 3.7-1
Special-status Species Information for the Subject Property

Species/Natural Communities	Special Status	Likelihood of Occurrence	Comments
Dodecahema leptoceras slender-horned spineflower	FE, SE, 1B	None	Found in alluvial fan sage scrub and chaparral.
Astragalus brauntonii Braunton's milk-vetch	FE, 1B	None	Found in brushy places, particularly fire breaks.
Orcuttia californica California Orcutt grass	FE, SE, 1B	None	Found in vernal pools associated with valley grasslands and freshwater wetlands.
Natural Communities			
Southern Coast Live Oak Riparian Forest	CNDDB	None	Confirmed not present
Southern Cottonwood Willow Riparian Forest	CNDDB	None	Confirmed not present
Southern Sycamore Alder Riparian Woodland	CNDDB	None	Confirmed not present
California Walnut Woodland	CNDDB	None	Confirmed not present
Southern Mixed Riparian Forest	CNDDB	None	Confirmed not present
Walnut Forest	CNDDB	None	Confirmed not present
Southern California Arroyo Chub/ Santa Ana Sucker Stream	CNDDB	None	Confirmed not present
Riversidian Alluvial Fan Sage Scrub	CNDDB	None	Confirmed not present

Key:

FE = federally endangered; FT = federally threatened; FC = federal candidate; SE = state endangered; SC = state species of special concern; 1B = CNPS List 1B plant ("Plants rare, threatened or endangered in California and elsewhere"); CNDDB = Tracked by the CNDDB, but with no other special regulatory or management status.

Source: CDFG, 2006.

Given that the Project site is located in a highly urbanized area of the San Fernando Valley, contains no native habitat types, and is based on the information provided in **Table 3.7-1** there is no potential for special-status species occurrence at the property and there would be no impact from the Project.

3.7.3.2 Riparian Habitat

Similarly, the Project would not have an impact on riparian habitat. The Project site does not contain any surface water bodies such as rivers, streams, and lakes or riparian plant species such as willows, cottonwoods, tamarisk, or mulefat and, therefore, does not contain any riparian habitat.[2] According to the CNDDB search of the subject property, there are eight natural communities tracked by CDFG in the Project area (**Table 3.7-1**). The Project site does not contain any of these natural communities. [3] Therefore, the Project would not affect any riparian habitat or other sensitive natural community.

3.7.3.3 Wetlands

The Project site does not contain surface water, the proper soils (i.e., hydric or waterlogged soils), or the presence of hydrophytes (i.e., "water-loving" plants) (USGS, 1966). Additionally, the Burbank quadrangle map does not show any blue-line streams running through the Project site (USGS, 1966). Therefore, the Project site does not contain wetlands as defined by Section 404 of the Clean Water Act and there would be no impact on federally protected wetlands from the Project.

3.7.3.4 Wildlife Migration Corridors

The Project site is completely surrounded by built land uses and roadways. Movement of wildlife to and from the Project site is limited or nonexistent because of these surrounding land uses and associated human disturbance (e.g., noise, dust, and traffic). The Verdugo Hills are located just east of the Project site and bird species from this area might occasionally use the site. No surface water bodies are located at the Project site that would support fish species. Therefore, the Project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors.

3.7.3.5 Local Preservation Ordinances and Habitat Conservation Plans

The Project site is within the City of Los Angeles and subject to its local policies or ordinances protecting biological resources. According to Article 6, Section 46.00 of the City of Los Angeles Municipal Code, valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), and any other indigenous oak to California with an 8-inch-diameter or larger at breast height are protected. However, the Project site does not contain any oak trees. There are no other applicable City of Los Angeles policies or ordinances that protect biological resources. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources.

[2] Ibid.
[3] Ibid.

Similarly, there are currently no adopted or proposed habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans for the subject property area.

Biological resource impacts discussed in this EIR apply to the Project regardless of which baseline is used to measure impacts.

3.7.4 Cultural Resources

3.7.4.1 Historic Resources

The Project would not cause a change in the significance of a historical resource. All Buildings onsite were built after the year 2000. The buildings do not have any features of historical significance for that period and are not considered to be significant as defined by CCR Section 15064.5. No impact on historical resources would result from the Project. No mitigation measures would be required.

3.7.4.2 Archaeological and Paleontological Resources

The Project would not cause a change in the significance of an archaeological resource. The Project site is located in an urban area within the City of Los Angeles and has previously been developed. The Project site has been subject to grading and other ground-disturbing activities during the construction and operation of the current C&D operation. Any surficial archaeological resources that might have been present before the area was developed would have likely been unearthed or disturbed to accommodate existing building foundations (South Central Coastal Information Center, 2006). The Project includes excavation and re-compaction. Archaeological resources could exist at subsurface levels; however, the likelihood of uncovering such resources during construction is considered remote because of prior disturbance. [4]To ensure the Project would not affect archaeological resources, the applicant has agreed to halt construction and retain a certified archaeologist to identify and ensure the proper disposition of any resources discovered during construction.

The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The Project site has been subject to grading and other ground-disturbing activities during the construction of the current C&D operation. Any surficial paleontological resources that might have been present before the area was developed would have likely been unearthed or disturbed to accommodate building foundations. Paleontological resources could exist at sub-surface levels (McLeod, 2006). Because the Project entails excavation and re-compaction, the likelihood of uncovering such resources during construction would be considered a significant impact. [5] To mitigate this impact, the applicant has agreed to stop construction and have a certified paleontologist or geologist secure and identify the resource. Construction will resume after a certified paleontologist or geologist has determined construction will not have a significant impact on paleontological resources or unique geologic features.

[4] Ibid.
[5] Ibid.

3.7.4.3 Human Remains

The Project would not disturb any human remains. The Project site has a C&D materials recovery facility and has been developed. No known human remains exist on the Project site, and the Project site has not been designated for use as a cemetery. The Project site has been subject to grading and other ground-disturbing activities during the construction and operation of the existing facility. No human remains were discovered during construction. Although it is unlikely that human remains are present on the Project site, construction activity could unearth undiscovered human remains. To ensure that no impact would occur from the Project, the applicant has agreed that if human remains are discovered during construction, the Project applicant would implement the process specified by the California Health and Safety Code to ensure the proper removal of human remains from the Project site.

Cultural resource impacts described in this EIR apply to the Project regardless of which baseline is used to measure impacts.

3.7.5 Land Use

The Project site is located in the Sun Valley—La Tuna Canyon Community Plan (SVLTCCP) area. The SVLTCCP guides land use, design, and character of land uses and open space; conservation of existing and provision of new housing; provision of supporting infrastructure and public services; protection of environmental resources; and protection of residents from natural and other known hazards. The community plan designates the Project site as industrial manufacturing, and the site is zoned M2-1-G, which allows for the operation of the existing and proposed use of the site as a solid waste transfer/recovery facility with a conditional use permit (CUP ZA-98-0427).

The Project would add a MRF/TS to the existing C&D recovery facility, enclose recovery operations and use manual and automatic misting systems and negative air pressure systems to control odor and the release of air particulates The Project will also implement the Stipulated Judgment with the City Attorney's office, which will increase the compatibility of the use with surrounding uses. The Project would also upgrade the existing industrial character of the site by improving its appearance. The Project would be consistent with the following objectives set forth in the SVLTCCP:

- To provide for the retention of existing industrial uses and promote future industrial development, which contributes to job opportunities and minimizes environmental and visual impacts.
- To encourage the conservation and strengthening of viable industrial development throughout the planning area.
- To ensure mitigation of potential negative impacts generated by industrial uses when they are located in proximity to residential neighborhoods, the Plan proposes design guidelines for new industrial uses when so located.

The Project's relationship to surrounding land uses is further enhanced by adherence to the conditions in the current CUP that controls development on the site. These conditions relate to the removal of graffiti, requirements for sorting recyclable materials, hours of operation, landscaping, the management of hazardous materials, parking requirements, and other

measures. Since the Project will continue to operate under this Permit, it is unlikely that the Project will cause an adverse effect on nearby land uses.

Since the Project is consistent with the SVLTCCP, the City Zoning Code will serve to upgrade the existing industrial character of the site, and will operate in accordance with conditions contained in the CUP for the Project site; there would only be positive land use impacts from the Project. The Project would have no negative impact and would not require mitigation measures.

Land use impacts described in this EIR apply to the Project regardless of which baseline is used to measure impacts.

3.7.6 Mineral Resources

The Project site is located in an area that has historically been used for surface gravel and sand mining. Former mining facilities include the Bradley Landfill located 0.2 mile west of the Project site, and the CalMat Trout/Schweitzer Pond located 0.2 mile north of the Project site. Active mining facilities include the CalMat Operation located approximately 1.2 miles north of the Project site, where operations are estimated to continue until 2008 (City of Los Angeles, 1999). Although the Project site is in an area that has historically been used for surface mining operations, the Project site has previously been disturbed and most surficial mineral resources would have likely been removed during previous excavations of the Project site. The Project would only excavate soils, when necessary, which would leave any potential mineral resources undisturbed for future mining excavation operations. Therefore, the Project would not result in the loss of availability of any local or regionally important mineral resource.

Mineral resource impacts discussed in this EIR are considered less than significant regardless of which baseline is used to measure the significance of impacts.

3.7.7 Public Services

3.7.7.1 Fire Protection

First response for fire and paramedic services to the Project site would be provided by the City of Los Angeles Fire Department Station No. 77 located at 9224 Sunland Boulevard in the community of Sun Valley. This station is approximately 0.4 mile from the Project site (Rand McNally & Company, 2005). The applicant submitted a Fire Control and Mitigation Plan (FCMP) to the City of Los Angeles Fire Department. This plan describes measures to be implemented to control and extinguish fires at the Project site, identifies equipment that will be available onsite, determines the extent of mitigation for the effects of fire onsite, and guides cooperation with the local fire department to serve the Project site. The FCMP was approved by the City of Los Angeles Fire Department on July 28, 2005. Continued implementation of the FCMP will result in a less than significant impact on fire protection services.

3.7.7.2 Police Protection

The Project would not increase the type of or need for police protection services provided by the City under existing conditions. Therefore, there would be no impact on police protection services and no mitigation measures would be required from the Project.

3.7.7.3 Schools and Parks

As discussed in Section 3.1.4, new jobs provided by the Project are likely to be filled by the local labor force. Accordingly, the Project is not anticipated to increase the demand for new housing in residential areas near the Project site. Because the Project will not measurably affect the demand for new housing, it would not contribute to increased school enrollment or the demand for new parks and/or recreational services.

Public service impacts described in this EIR apply to the Project regardless of which baseline is used to assess the significance of impacts.

3.7.8 Public Utilities

3.7.8.1 Wastewater Treatment

Wastewater discharge from the Project site is regulated under Industrial Waste Permit W-499820, issued by the City of Los Angeles, Department of Public Works, Bureau of Sanitation, Industrial Waste Management Division. This permit establishes the discharge limitations, conditions, and requirements in accordance with the Los Angeles Municipal Code Section 64.30. This permit authorizes the use of a clarifier and flow meter attached to the clarifier. It also permits the truck washing and steaming operation on the Project site. These permit requirements ensure wastewater discharge does not conflict with the treatment requirements of the RWQCB.

Regardless of which baseline is used to measure the significance of impacts, the Project will not significantly change the amount of water consumption or wastewater discharge generated at the Project site, and it would not require any new water drainage facility. Therefore, the Project would not result in an impact on the type of wastewater services currently provided to the Project site.

3.7.8.2 Water Consumption and Treatment

Moving operations indoors and changing the waste flow to accept more MSW and commingled recyclables but less C&D materials will not significantly change the amount of water consumption or wastewater discharge generated at the Project site. The Project would not result in the need to expand or construct new water supply or treatment facilities.

3.7.8.3 Solid Waste Facilities

The Project, by providing additional capacity to divert solid waste from landfills, would conserve available landfill capacity. By taking more solid waste and less C&D materials in the future, the Project would conserve capacity at Class III MSW landfills such as Sunshine Canyon, Chiquita Canyon, and existing permitted landfills in the Antelope Valley rather than landfills limited to the disposal of inert (C&D) materials.

The Project would provide additional capacity to divert MSW from landfills in accordance with the California Integrated Waste Management Act of 1989 (AB 939), which requires that local governments divert 50 percent of MSW from landfills. Therefore, the Project would comply with this legal requirement.

The significance of impacts on public utilities is not affected by either baseline used to measure that significance.

3.7.9 References

CDFG, CNDD. 2006. For the Burbank, San Fernando, Sunland, Condor Peak, Pasadena, Los Angeles, Hollywood, Beverly Hills, and Van Nuys 7.5-minute quadrangles. Information accessed from the CDFG Web site at: http://www.dfg.ca.gov/whdab/html/cnddb.html on May 23, 2006.

South Central Coastal Information Center. 2006. Archaeological Resources Information Request, May 16, 2006.

McLeod, Samuel A., Ph.D. 2006. Personal Communication. Natural History Museum of Los Angeles County, May 24, 2006.

Rand McNally & Company, 2005.

SECTION 4

Alternatives

4.1 Introduction and Overview

This section presents alternatives to the Project. Section 15126.6 of the *CEQA Guidelines* requires that an EIR present a range of reasonable alternatives to the Project, or to the location of the Project that could feasibly attain most of the basic Project objectives, but avoid or substantially lessen any significant effects of the Project. This section also requires an evaluation of the comparative merits of the alternatives.

The discussion of alternatives must focus on the alternatives capable of avoiding or substantially lessening the significant environmental effects of the Projects, even if the alternative could impede, to some degree, the attainment of all Project objectives or would be more costly (*Guidelines,* Section 15126.6[b]).

The range of alternatives discussed in an EIR is governed by the "rule of reason" that requires identification of only those alternatives necessary to permit a reasoned choice between the alternatives and the Project. Alternatives can be eliminated from detailed consideration for a variety of reasons, including failure to meet most of the Project objectives, or inability to avoid or substantially lessen the significant environmental effects of the Project (*Guidelines,* Section 15126.6[c]). The EIR must describe the rationale for the selection and rejection of alternatives and the information relied upon in making this determination.

In addition, Section 15126.6(e) of the *Guidelines* requires that the "No Project" alternative be evaluated and compared to the Project. As indicated in this section of the *Guidelines*, "the purpose of describing and analyzing a No Project alternative is to allow decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project." Section 15126.6(e)(3) indicates that the "No Project" alternative is the circumstance under which the Project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against the environmental effects which would occur if the Project is approved."

If the environmentally superior alternative is the No Project alternative, the *Guidelines* further require the EIR to determine if there is an environmentally superior alternative among the other alternatives. An EIR is not required to evaluate an alternative if its effects cannot be reasonably identified, or if its implementation is remote or speculative.

4.2 Alternatives Analyzed

Two alternatives are evaluated in this section of the EIR.

4.2.1 No Project Alternative

CEQA requires that the No Project alternative be evaluated in all EIRs. For this Project, the No Project alternative is the level at which the facility can operate without a new discretionary permit that would require environmental review under CEQA.

As discussed in the Project description (Section 2) and throughout this document, the Project currently operates under a CUP that allows for processing of up to 1,500 tpd of waste materials. However, the operation of a 1,500-tpd (or even 400-tpd) facility, whether it involves the recovery of either C&D or MSW, requires a Solid Waste Facility Permit (SWFP) from the California Integrated Waste Management Board (CIWMB), a discretionary permit subject to CEQA review.

Under Title 14, Chapter 3, Article 5.9, Section 17383.5 of the Public Resources Code (PRC), the facility could be classified as a Medium-Volume Construction and Demolition and Inerts Processing Facility and process up to 175 tpd of C&D materials without obtaining a SWFP. With this classification, the Project would need a Registration Permit, which is not considered discretionary and/or subject to CEQA review. Accordingly, the No Project alternative is defined as a 175-tpd C&D processing operation.

4.2.2 1,500-tpd MSW Alternative

The impact assessment section of this document indicates that the Project will result in a significant unavoidable air quality impact when Project impacts are measured against a 400-tpd baseline. When air quality impacts are assessed using the 1,500-tpd baseline, the analysis shows that air quality impacts are less than significant because the baseline involves the use of mainly heavy-duty vehicles that characterize C&D hauling operations which are replaced with medium-duty vehicles that are typical in the collection of MSW.

Using this logic, the alternative of processing 1,500 tpd of MSW is evaluated as a project alternative in this section of the EIR. This alternative was selected for consideration because the site can easily be reconfigured to accept this throughput, because the alternative is consistent with Project objectives, and because it substantially reduces the Project's only significant unavoidable impact. This alternative will also result in fewer trips and less traffic impact than the Project. This alternative would also result in fewer trips than were analyzed in the 1999 MND.

4.3 Alternatives Eliminated From Further Consideration

The following alternatives were also examined in this EIR but eliminated from further consideration for a variety of reasons.

4.3.1 Use of Alternative Sites

Alternative sites were eliminated from consideration for several reasons. First, the Project site is planned and zoned to support the Project which may not be true of alternative sites.

Second, the site currently supports waste processing operations which also may not be the case with alternative sites. Third, interior portions of the site are not visible to receptor locations, another key factor to consider in siting new facilities. Finally, the impact analysis shows a significant unavoidable impacts air quality impacts which are *regional* (emphasis added) and would occur if the Project was located anywhere within the South Coast Air Basin. Since the selection of an alternative site would not eliminate or substantially reduce this impact, and because the Project site has the above environmental advantages compared to alternative sites, alternative sites are not evaluated herein.

4.3.2 Reduced MSW Throughputs

Section 4.2.2 provides the rationale for evaluating the 1,500-tpd alternative in this section of the EIR. A throughput of less than 1,500 tpd of MSW could have been selected (for example, 1,200 tpd of MSW; 1,000 tpd of MSW) making the argument that the lower the MSW throughput the greater reduction in emissions. The following discussion explains why lower MSW throughput will not necessarily reduce air emissions compared to the 1,500-tpd MSW alternative.

Table 4-1 shows the existing disposal rates (as of December 31, 2005) and permitted disposal rates at the landfills closest to the Project site. These data were collected before the recent closure of the Bradley West Landfill.

TABLE 4-1
Available Disposal Capacity at Landfills Near Project Site

Landfill	Existing Disposal Rate[a]	Permitted Disposal Rate
Sunshine Canyon Landfill	8,181[b]	12,100[c]
Chiquita Canyon Landfill	4,900	6,000
Antelope Valley Landfill	1,186	1,200
Lancaster Landfill	1,490	1,700

Source: Los Angeles County Department of Public Works; *2005 Annual Report, Los Angeles County Integrated Waste Management Plan;* May 2007.

[a] Existing disposal rate as of December 31, 2005.

[b] Existing disposal rate is the combined rate for the portion of the landfill located in the City of Los Angeles and the portion located in unincorporated Los Angeles County.

[c] Permitted disposal rate is the combined rate for the portion of the landfill located in the City of Los Angeles and the portion located in unincorporated Los Angeles County

The information above shows how limited disposal capacity is under existing conditions in Los Angeles County. As local landfills reach their permitted disposal rates, refuse collection vehicles must travel farther to other existing disposal facilities with available capacity (e.g., El Sobrante in western Riverside County, Simi Valley Landfill) unless solid waste transfer capacity is available in accessible locations. By definition, transfer stations are load consolidation facilities that serve to reduce the number of trips and vehicle miles traveled to more distant disposal facilities.

With the closure of the Bradley West Landfill, available disposal capacity at landfills near the Project site is anticipated to be even more limited than shown in **Table 4-1**. In 2003, the average disposal rate at this landfill was 1,500 tpd. The disposal rate increased as the facility reached capacity. This facility was permitted to receive 10,000 tpd.

As indicated in Section 4.2.2, the 1,500-tpd level was selected for analysis in this alternatives section because the site can be configured to handle this throughput, because the facility already has a land use permit to allow this proposed use, because the alternative is consistent with most Project objectives, and because the alternative results in a substantial mitigation of the one significant unavoidable impact identified in the impact assessment. Given the above limitations on disposal capacity, less MSW throughput at the Project site may result in increased emissions as trips are diverted greater distances to existing disposal facilities with available capacity.

4.4 Evaluation of Alternatives

4.4.1 No Project Alternative

Under the No Project alternative, approximately 175 tpd of C&D material would be processed outdoors. This proposal compares to the Project, which involves the processing of 500 tpd of C&D material and 1,000 tpd of MSW, as follows:

- **Aesthetic/Visual Impacts:** With the Project and the no-project alternative**,** mature landscaping and block walls would continue to block views by e to nearby residents or other sensitive receptor locations for either the No Project alternative or the Project. The No Project alternative would not require additional lighting at the Project site and therefore would not impact light or glare in the Project area. The Project's impact on light and glare is also considered less than significant.
- **Air Quality:** The No Project alternative means that no MSW collection vehicles will utilize the site. Although other MSW transfer and recovery facilities are planned in the immediate vicinity of the Project site, the No Project alternative may result in more air emissions than the Project if these trips are diverted to more distant transfer or disposal facilities.
- **Biological Resources:** The Project site has been disturbed as a result of past activity. Neither the Project nor the No Project alternative would have a significant impact on biological resources.
- **Cultural Resources:** The Project site has been disturbed as a result of past activity. Neither the Project nor the No Project alternative would have a significant impact on cultural resources.
- **Geology, Soils, and Seismic:** Structures on the Project site would be subject to damage from ground shaking during seismic events. Construction in accordance with the seismic safety requirements of the Uniform Building Code is anticipated to reduce impacts to less than significant impact. Neither the Project nor the No Project alternative will result in a significant impact.

- **Land Use:** The Project site is designated for industrial use in the Sun Valley—La Tuna Canyon Community Plan and the City's zoning ordinance. Neither the No Project alternative nor the Project will change the Project site's relationship to nearby land uses.
- **Population and Housing:** Under the No Project alternative, waste processing activities would occur on property that is planned and zoned for industrial use. Neither the Project nor the No Project alternative divide an established residential area or generate the demand for new housing in areas near the Project site. Both the Project and the No Project alternative would have a less than significant impact in creating jobs and related demand for new population and housing.
- **Noise:** As indicated in Section 3, the Project will not result in a significant noise impact. Since the No Project alternative should involve less traffic and less C&D processing activity than under existing conditions, the impact of the No Project alternative is also less than significant.
- **Public Services and Utilities:** Neither the No Project alternative nor the Project will require the expansion or significantly increased levels of public services or utilities.
- **Traffic:** The No Project alternative will result in less daily and peak hour traffic to the Project site than the Project; although, as indicated in Section 3, the Project impact on traffic is also less than significant. Since the no-project alternative would accept less traffic than the Project, Project traffic and related impacts would be experienced at other facilities within direct-haul distance of where materials are collected.
- **Public Health and Safety:** The No Project alternative means that no MSW would be processed at the Project site. The processing of C&D materials would be about half the existing throughput. With this much less material processed at the site, there would probably be less HHW under the No Project alternative than with the Project. However, the Project impacts related to the presence of HHW are mitigated to less than significant levels with load check programs, training programs to identify and segregate HHW, and other measures described in the applicant's Transfer Processing Report. The same type of measures would be in place to manage HHW detected in loads of C&D materials.
- **Surface Drainage:** The Project site is almost entirely paved. The amount of impermeable surface, and related runoff, would not increase under the Project or the No Project alternative. Since the Project involves moving operations indoors, the runoff quality with the Project is likely to have lower concentrations of TDS and TSS than under No Project conditions. However, no significant impact to surface water quality is anticipated with either the Project or the No Project alternative.

4.4.2 1,500-tpd MSW Alternative

Under this alternative, 1,500 tpd of MSW and no C&D materials would be processed at the Project site. This alternative would have the same impacts as described above for the No Project alternative as related to:

- Aesthetic/Visual Resources
- Biological Resources
- Cultural Resources

- Geology, Soils, Seismic
- Land Use
- Population/Housing
- Public Services/Utilities
- Surface Drainage

The following identifies impact assessment categories where the impacts of this alternative differ from that of the Project:

- **Air Quality:** The Project results in significant unavoidable impacts from VOCs and NO_X emissions when compared to the 400-tpd C&D baseline. Because this alternative results in the replacement of heavy-duty vehicles bringing C&D materials to the site with fewer vehicles bringing MSW to the Project site, this alternative will result in fewer emissions than the Project around the project site. However, C&D trips which currently utilize the facility would be diverted elsewhere. Since there are few C&D recovery facilities in the City or elsewhere in Los Angeles County, existing C&D trips may travel longer distances and generate more emissions under this alternative than with the project. Therefore this alternative could generate even more NO_X and VOC emissions than the project (under either baseline).

  In addition, MSW contains more putrescible organic materials than C&D materials, resulting in more odors. Under both the Project and this alternative, odors will be mitigated to less than significant levels by moving operations indoors, using a forced-air ventilation and filtration system, and misting system to neutralize odors in incoming loads. The Project will also need comply with the SCAQMD's Rule 410, which requires transfer stations to prepare and implement Odor Management Plans.

  C&D operations generally result in more dust generation than MSW transfer and recovery operations. Hence, this alternative will result in fewer particulate emissions than the Project. Please note that particulate emissions from the Project are considered less than significant.

- **Traffic:** Since MSW collection vehicles have payloads twice that of incoming C&D vehicles (10 tons/vehicle for MSW vehicles and 5 tons/vehicle for C&D vehicles), this alternative will result in 50 less trips per day than the Project. However, MSW trips are routed in a way to result in more AM peak trips than the Project. Neither MSW nor C&D trips result in many trips during the PM peak hour. Neither this alternative nor the Project will result in a significant impact on intersections in the vicinity of the Project site.

- **Public Health and Safety:** Although MSW typically contains small volumes of HHW, HHW is relatively more prevalent in MSW than in C&D materials. With this alternative and with the Project, this impact will be mitigated to less than significant levels through implementation of a load-check program, the implementation of training programs so that employees can recognize and segregate HHW, the storage of HHW in the existing onsite HHW storage container, manifesting all loads removed from the site, and delivering these materials to permitted recycling and processing facilities. With the Project, the implementation of these measures will be used to reduce hazards associated with the presence of HHW in both MSW and C&D loads.

- **Noise:** Compared to the Project, this alternative will result in less traffic noise than the Project because both engine noise and brake noise levels are louder with larger vehicles and this alternative reduces the number of heavy-duty vehicles using the Project site. Since Project-generated noise is not considered significant, the same would be true for this alternative.

Compared to the Project, the 1,500-tpd MSW alternative may result in more VOC and NO_X emissions than the Project as existing C&D trips are diverted elsewhere. In addition, this alternative is not consistent with one of the key project objectives to maintain both MSW and C&D diversion capacity. This alternative will not meet the Project objective of providing additional C&D material recovery facility capacity to meet AB 939 requirements and the City goal of 70 percent solid waste diversion. This alternative will provide additional MSW material recovery facility capacity, however the C&D capacity is important to the overall goal of solid waste diversion as C&D waste typically yields a greater percentage of recyclable material than MSW.

4.4.3 Environmentally Superior Alternative

The CEQA Guidelines require that, if the No Project alternative is found to be environmentally superior, "*the EIR shall also identify an environmentally superior alternative among the other alternatives*" (*Guidelines, Section 15126[e][2]).*

As discussed in Section 4.4.1 above, the No Project alternative may result in more emissions than the Project because it would result in more long-distance MSW trips traveling greater distances to local landfills. The No Project alternative is, therefore, not considered environmentally superior to the Project.

As indicated above in the discussion of the 1,500-tpd MSW alternative, this alternative results in more VOC and NO_x emissions than the project. This alternative is also not considered environmentally superior to the project because it conflicts with the objective of providing both MSW and C&D diversion capacity.

4.5 References

Christopher A. Joseph and Associates. 2005. DEIR for the Bradley Landfill and Recycling Center Transition Plan, Page 3-7.

SECTION 5

Growth-inducing Impacts

5.1 Introduction

CEQA requires an EIR to discuss ways in which a Project could directly or indirectly foster population or economic growth, or the construction of additional housing. According to Section 15126.2[d] of the CEQA Guidelines, the assessment of growth-inducing impacts should consider whether a Project would remove an obstacle to population or economic growth or create new community services. This section evaluates the direct and indirect growth-inducing impacts of the Project.

5.2 Direct Growth-inducing Impact

The project is expected to create approximately 15-20 construction jobs. On a short-term basis, construction jobs created by the Project are likely to be filled by the local labor force rather than the construction labor force outside the Los Angeles area. The size of the construction of the Project is small compared with other proposed projects in the San Fernando Valley, downtown, and other parts of Los Angeles. Therefore, impacts on construction jobs or expenditures are considered less than significant.

Given the size of the local and regional labor pool within the greater Los Angeles area, any employment growth created by the Project would likely occur without an influx of workers moving into the community. Because the Project will create very few jobs, any increase in population or housing demand associated with employment growth would not be significant. For both construction jobs and long-term employment, the Project is unlikely to stimulate substantial growth in the retail sector or otherwise stimulate economic growth within the region.

Therefore, the direct growth-inducing impact is not considered significant because it would not generate a significant demand for new housing and because it would not significantly contribute to the short-term or long-term economic growth of the greater Los Angeles area.

5.3 Indirect Growth-inducing Impact

As discussed in the population and housing section (Section 3.4), the Project is a solid waste material recovery transfer station facility that will process 1,000 tpd of MSW and 500 tpd of C&D materials. The Project applicant estimates that the Project will divert approximately 20 percent of the MSW and 80 percent of the C&D materials received at the Project site. By diverting waste from solid waste landfills, the Project will serve to conserve the capacity of existing landfills and incrementally reduce the need for new disposal facilities.

According to the Bureau of Sanitation, the City's overall solid waste stream is growing at an annual rate of approximately 2 percent and the City lacks the number of diversion facilities

needed to achieve the 50 percent diversion requirement of AB 939 and the City's 70 percent diversion goal. Because the City lacks the diversion capacity to serve future needs, the Project, which is not considered growth-inducing, is necessary to accommodate the expected population and economic growth in the City.

SECTION 6

Significant Irreversible Changes

6.1 Introduction

Section 15126.2[c] of the *CEQA Guidelines* require an EIR to consider any significant, irreversible, environmental changes caused by a project. This section reads as follows:

> *Uses of nonrenewable resources during the initial and continued phase of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.*

6.2 Analysis of Significant Irreversible Changes

The Project will require the use of nonrenewable resources, such as metal alloys and aggregate resources for the physical construction of the Project. However, the Project will not result in an inordinate use of raw materials in comparison to other urban development. Since the amount of materials used is commensurate with the size of the Project and this is a small construction project compared with many other local commercial and industrial projects in the Los Angeles area, this impact is not considered significant.

For this type of project, the construction and operational impacts are closely interrelated. The Project will recover both MSW and C&D materials. Over the life of the project, it is very likely that more wood, metal, concrete, and other construction materials will be recovered at the facility than are used for construction.

During construction and operation of the Project, fossil fuels in the form of diesel and gasoline will be used to operate vehicles and equipment. Electrical energy and natural gas will also be used during construction. Nonrecoverable materials and energy used during construction and for operational activities would utilize existing supplies. Although the increase in the amount of materials and energy used would be insignificant, they would nevertheless be unavailable for other uses.

In addition to the recovery of C&D materials discussed above, the project will result in the recycling and recovery of materials (paper, cardboard, glass, aluminum etc.) that would otherwise be disposed. By increasing capacity to divert waste from landfills, the Project will serve to conserve existing landfill capacity and reduce the need for new disposal facilities. Since landfills are viewed as major generators of methane (CH_4), which is classified as a greenhouse gas (GHG), this Project will have a beneficial effect in limiting GHG emissions and impacts related to climate change. (See Section 7.) The Project also involves the

construction of a solar power system to provide electricity and partially offset the demand for power from facilities which generate GHGs from the use of fossil fuels. Section 7 of this EIR discusses the GHG impacts of the project and concludes that with the project, GHG emissions will be reduced when the project is compared to both the 400-tpd and 1,500-tpd baselines.

SECTION 7

Global Climate Change and Green House Gases

7.1 Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however some data indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) emissions of "greenhouse gases" (GHGs) is currently one of the most important and widely debated scientific, economic and political issues in the United States and the world. There is general scientific consensus that most of the observed increase in globally averaged temperatures since the mid 20th century is likely due to the increased anthropogenic greenhouse gas emissions.

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining the Earth's surface temperature. Specifically, these gases allow high-frequency solar radiation to enter the Earth's atmosphere, but retain the low frequency energy which is radiated back from the Earth to space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. It is increasingly becoming accepted that increased concentrations of GHGs in the Earth's atmosphere are linked to global climate change, such as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increasing frequency and magnitude of severe weather conditions.

GHGs include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Carbon dioxide is the most abundant GHG. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. According to the California Energy Commission (CEC), emissions from fossil fuel consumption represent approximately 81 percent of GHG emissions and transportation creates 41 percent of GHG emissions in California.

Our understanding of the fundamental processes responsible for global climate change has improved over the past decade, and our predictive capabilities are advancing. However, there remain significant scientific uncertainties, for example, in predictions of local effects of climate change, occurrence of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Because of the global nature of these environmental changes, the effects of a single development may not result in impacts that result in climate change. However, it is important to recognize that all increases in GHGs contribute cumulatively to these changes.

7.2 Regulatory Setting

7.2.1 Kyoto Protocol

The Kyoto Protocol is an international agreement, negotiated in December 1997, by which industrialized nations have committed to making substantial reductions in their emissions of greenhouse gases by 2012. More than 160 countries have committed to the agreement thus far. Although the United States signed the Kyoto Protocol, the treaty has not been ratified by the U.S. Senate. Ratifying the Kyoto Protocol would require the U.S. to reduce greenhouse gas emissions by 7 percent below its 1990 levels by 2012. In July 1999, the Senate voted 95-0 not ratify the Protocol unless rapidly developing countries such as China were included in its requirements to reduce greenhouse gases. The current Administration has also rejected the Kyoto Protocol as being too costly for the U.S. economy, and has proposed its own climate change initiative which calls for voluntary reductions in emissions, tax credits for emissions reductions, and increased research and development for new energy technologies. Many individual states—primarily in the Northeast and the West—have also begun to adopt their own climate change policies.

7.2.2 California

In 2006, California adopted two significant laws targeted at global climate change. First, the California Global Warming Solutions Act of 2006 (also known as Assembly Bill 32, or AB 32) declared global warming to be "a serious threat to the economic well-being, public health, natural resources, and the environment of California" (Health and Safety Code (HSC) Section 38501), and mandated a reduction of GHG emissions to 1990 levels by 2020 (HSC Section 38550). California has not yet set a statewide GHG emissions standard for development, or most other industries, although the California Air Resources Board (CARB) is developing a scoping report that will identify the industries and types of mechanisms to meet the state's targets. Over the intervening period, CARB must accomplish the following milestones under AB 32:

- Jan. 1, 2008: CARB to set 1990 baseline level of GHG emissions, and establish mandatory GHG reporting for certain "mandatory reporting" industries
- Jan. 1, 2009: CARB to release its scoping plan indicating how it will achieve emissions reductions from significant GHG sources through regulations, market mechanisms, and other strategies; CARB to announce whether it will implement a *de minimis* GHG thresholds below which it will not regulate
- Jan. 1, 2010: CARB's "early action measures" take effect
- Jan. 1, 2011: CARB to adopt regulations to achieve AB 32's 2020 GHG emissions reduction goal
- Jan. 1, 2012: AB 32's implementing regulations go into effect

AB 32 explicitly notes that some industries will face a heavier burden to reduce emissions than others. AB 32 charges CARB with meeting the statewide target "in a manner that minimizes costs and maximizes benefits for California's economy, improves and modernizes California's energy infrastructure and maintains the electric system reliability,

maximizes additional environmental and economic co-benefits for California, and complements the state's efforts to improve air quality" (HSC Section 38501[h]). It directs CARB to begin emissions monitoring and annual reporting by January 1, 2008, starting first with those emissions sources "that contribute the most to statewide emissions" (HSC Section 38530[b][1]). AB 32 also directs CARB to "recommend a *de minimis* threshold of greenhouse gas emissions below which emissions reduction requirements will not apply" by January 1, 2009 (HSC Section 38561[e]). CARB has mentioned a 25,000 metric ton emissions level as a potential *de minimis* threshold.

According to the CARB, California emitted between 425 to 468 metric tons of GHGs in 1990, and 492 million metric tons in 2004 (the most recent year for which data is available). According to the California Department of Finance (DOF), Demographic Research Unit, the State's 1990 population was 29,758,213. Conservatively assuming CARB's 1990 baseline at 425 million metric tons, dividing these emissions by the DOF population figure results in a per capita rate of 14.3 metric tons of CO_2 per year. DOF projects a 2020 statewide population of 43,851,741. If future GHG emissions are limited to the 1990 baseline (425 million metric tons), per capita emissions in 2020 would have to be reduced by 32.2 percent to 9.7 metric tons of CO_2 to maintain the 1990 baseline emissions level.

In 2006, California enacted SB 1368, which sets a GHG emissions performance standard for new electricity providers and prohibits utilities from entering into long-term financial commitments with out-of-state power providers that emit more GHGs than the performance standard. Both AB 32 and SB 1368 follow California's 2002 effort to regulate motor vehicle-related CO_2 emissions (AB 1493).

More recently, legislation has been chaptered (SB 97 (Dutton)) that requires the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the Resources Agency proposed additions to the CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, including, but not limited to, effects associated with transportation or energy consumption. The Resources Agency is required to certify and adopt those guidelines by January 1, 2010. OPR is required to periodically update the guidelines to incorporate new information or criteria established by CARB pursuant to AB 32.[1] In June 2008, OPR released a Technical Advisory on CEQA and Climate Change. The advisory recommended a three-step approach for compliance with CEQA: identify and quantify GHG emissions, assess the significance of the impact on climate change, and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance (OPR, 2008).

The South Coast Air Quality Management District (SCAQMD) recently began an effort to develop CEQA Thresholds of Significance for greenhouse gases. Like other SCAQMD

[1] SB 97 (Dutton) was enrolled by the California legislature on August 21, 2007, and then signed into law by the Governor. SB 97 (Dutton) provides that in an EIR, negative declaration, mitigated negative declaration, or other document required by CEQA for either transportation projects funded under the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, or projects funded under the Disaster Preparedness and Flood Prevention Bond Act of 2006, the failure to analyze adequately the effects of greenhouse gas emissions otherwise required to be reduced pursuant to regulations adopted under AB 32 does not create a cause of action for a violation of CEQA. The bill provides that the provision applies retroactively for any of the above documents that are not final, and will sunset on January 1, 2010.

thresholds of significance, it is anticipated that these criteria will be used in most, if not all, CEQA documents prepared within the South Coast Air Basin.

7.2.3 *Massachusetts v. EPA*, the Federal Clean Air Act, and Federal Legislative Efforts

Federal legislation and action by the U.S. Environmental Protection Agency (USEPA) is also expected soon. In *Massachusetts v. Environmental Protection Agency*, 127 S. Ct. 1438 (2007), the United States Supreme Court ruled that GHGs qualify as "air pollutants" under the federal Clean Air Act. The Supreme Court held that, unless the EPA concludes the GHGs are not causing climate change, then EPA must regulate GHGs from automobiles. The Supreme Court's conclusion that GHGs are "air pollutants" may apply to emissions from stationary sources, but it is not yet clear to what extent EPA would be required to regulate GHGs from stationary sources. EPA has not developed a mandatory regulatory program for GHGs, although it actively is engaged in a voluntary program.

7.3 Effect of AB 32 on CEQA Compliance

Although no specific language in AB 32 refers to CEQA compliance, it is understood that a law introducing a new environmental issue (i.e., GHG/global warming) into the state Health & Safety Code will result in the addition of that issue to the other environmental issues discussed in CEQA documents.

In a series of comment letters provided by the California Attorney General's Office, the Attorney General encourages CEQA lead agencies and other agencies to consider global warming impacts as cumulative and potentially significant under CEQA, and, accordingly, to include an assessment of GHG emissions as a part of the environmental review process. Also, an issue currently being litigated (Baird v. County of Contra Costa, 32 Cal. App. 4th, 1464) is whether the effects of global warming and greenhouse gas emissions on projects must be assessed in EIRs. This case will determine whether the effects of preexisting environmental conditions on projects.

CEQA requires an environmental document to account for a project's direct and reasonably foreseeable indirect impacts, as well as its short- and long-term effects (CEQA Guidelines Sections 15126.2[a] and 15064[d]). An environmental document must also consider potential impacts that may be cumulatively significant when aggregated with all other similar impacts (CEQA Guidelines § 15130[a][1]). The Guidelines define "cumulative impacts" as those arising from "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355).

When analyzing such environmental impacts, the lead agency is not required to foresee the unforeseeable. Instead, the lead agency "must use its best efforts to find out and disclose all that it reasonably can" (CEQA Guidelines Section 15144). Section 15064(b) of CEQA *Guidelines* encourages CEQA practitioners to base decisions "to the extent possible on and factual data." The lead agency is not required to evaluate speculative impacts (CEQA Guidelines § 15145).

As stated above, an increase in the generation and emission of GHGs by a single project cannot be directly equated with an identifiable adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere overall that may result in global climate change that has the potential to cause adverse environmental effects. Emitting GHGs into the atmosphere is not itself an adverse environmental effect; it is the increased accumulation of GHGs in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, to global climate change from one project's relatively small incremental increase in emissions.

While the City of Los Angeles does not currently have a CEQA significance threshold that applies to greenhouse gases, the City has adopted a goal to reduce the City's greenhouse gas emissions to 35 percent below the 1990 level by the year 2030.

7.4 GHG Emissions Analysis

Notwithstanding the lack of a significance threshold and/or a generally accepted methodology to determine whether GHG emissions represent new, existing or displaced emissions what follows is a quantitative analysis of GHG emissions based on the USEPA WARM Model which is designed to estimate GHG emissions for solid waste facilities such as the proposed project. As stated earlier, project based impacts cannot be analyzed because of the difficulty of drawing a causal connection between project specific GHG emissions and global climate change in the absence of quantitative significance thresholds. The analysis below considers the Project's impact on GHG emissions under both the 400-tpd baseline and the 1,500-tpd baseline.

7.4.1 400-tpd Baseline Analysis

Under the 400-tpd baseline, this Project's potential contribution to global climate change can be quantified as follows:

- By adding a MRF/Transfer Station project that would process 1,000 tons per day of (biodegradable) MSW, a substantial amount of materials that would otherwise generate greenhouse gas emissions (primarily methane) in landfills will be recycled.
- Compared to the 400-tpd baseline, the Project would result in a slight increase in the number of heavy-duty vehicles and off-road equipment using the Project site and a substantial increase in the number of medium-duty vehicles using the Project site. Using this baseline, commute trips by Project employees would also double. Accordingly, increased GHG emissions are expected from these sources.
- In accordance with the Stipulated Judgment between the previous property owner and the City Attorney, the project involves the construction of a minimum 2-kilowatt (KW) solar system to provide power to the site. Irrespective of what baseline is used to measure impacts, the use of this system would offset the use of electricity obtained from facilities that generate GHG emissions.

The following presents the methodology and results from estimating GHG emissions for the sources described above. GHG emissions were estimated in units of carbon dioxide equivalent (CO_2e) emissions.

The WAste Reduction Model (WARM), created by the USEPA, estimates and summarizes GHG emissions from baseline and alternative waste management practices (USEPA, 2007). WARM was used to estimate the net change of CO_2e emissions between the 400-tpd baseline and the Project (500-tpd C&D and 1,000-tpd MSW). It was assumed that without the Project 80 percent of the C&D waste (320 tpd) would be recycled, 20 percent of the C&D waste (180 tpd) would be deposited into a landfill, and 100 percent of the MSW (1,000 tpd) would be deposited into a landfill. It was further assumed that with the Project, 20 percent of MSW (200 tpd) would be recycled, 80 percent of MSW (800 tpd) would be deposited into a landfill, 80 percent of the C&D (400 tpd) would be recycled, and 20 percent of the C&D (100 tpd) would be deposited into a landfill. The WARM input and result sheets are included in Appendix E.

The net change in CO_2e emissions from vehicles between the 400-tpd baseline and Project were calculated using the SCAQMD Highest, Most Conservative table of EMFAC2007 (v 2.3) EFs for light duty automobiles, delivery trucks, and heavy-heavy duty diesel trucks (SCAQMD, 2008a).. According to the 2004, CARB GHG emissions inventory[2], N_2O emissions from mobile sources represent approximately 2 percent of total on-road transportation source emissions. Since CO_2 emissions represent over 97 percent of these emissions; N_2O emissions were not included in the analysis. The CO_2e emissions associated with the change in off-road equipment emissions between the 400-tpd baseline and the Project were estimated using OFFROAD emission factors (SCAQMD, 2008b). CH_4 emissions were converted to CO_2e emissions by multiplying the CH_4 emissions by the global warming potential of 21 (CCAR, 2008). The vehicle and equipment emission calculations are presented in Appendix E.

With the 400 tpd baseline, use of the WARM model results in a reduction of 173,093 metric tons per year of CO_2e emissions compared to baseline emissions. This reduction is due to less methane emissions at landfills. In converting methane to CO_2e emissions, the WARM model weights methane much higher than any other type of GHG emission. With this baseline, increased GHG emissions from trucks (12,628 metric tons per year of CO_2e), off-road equipment (894 metric tons per year of CO_2e), and electrical use (474 metric tons per year of CO_2e) do not outweigh the GHG emission reductions from diverting MSW from landfills. GHG emissions were calculated with and without the use of solar power at the project site. Solar power would have a very slight effect (2.6 metric tons of CO_2e per year) in offsetting GHG emissions from the use of electricity.

The Project would be expected to result in a net reduction of CO_2e emissions. Because Section 21068.5 of CEQA defines "significant effect on the environment" as "…a substantial, or potentially substantial, **adverse** (emphasis added) change in the environment," the Project's impact would not be significant compared to the 400-tpd baseline because GHG emissions would not increase.

[2] (http://www.arb.ca.gov/app/ghg/ghg_sector.php)

7.4.2 1,500-tpd Baseline Analysis

Under the 1,500-tpd baseline, this Project's potential contribution to global climate change is discussed below:

- The Project would result in the recovery and diversion of MSW that would otherwise be disposed in landfills. By diverting organic materials from landfills, the Project would result in less CH_4 and CO_2 emissions at landfills than would occur without the Project.
- Compared to the 1,500-tpd baseline, the Project would result in less total trips including a substantial reduction in the number of truck trips by heavy-duty vehicles. A slight increase of employee commute trips would be associated with the project. Under this scenario, GHG emissions from mobile sources may be less than under baseline conditions because medium-duty vehicles, with relatively lower emission factors, would replace many of the heavy-duty vehicles and there would be fewer total trips than under baseline conditions.
- In accordance with the Stipulated Judgment between the previous property owner and the City Attorney, the project involves the construction of a 2-kilowatt (KW) solar system to provide power to the site. Irrespective of what baseline is used to measure impacts, the use of this system would offset the use of electricity obtained from facilities that generate GHG emissions.

Using the 1,500-tpd baseline, it appears that the Project would result in a decrease in CH_4 and CO_2 emissions at landfills, a decrease in GHG emissions from mobile sources, and a decrease from the use of solar power to provide electricity. WARM was not run for the 1,500-tpd baseline because GHG emissions from all sources (landfill, solar power, mobile sources) would be less under this baseline than with the project. Since Section 21068.5 of CEQA defines "significant effect on the environment" as "…a substantial, or potentially substantial, **adverse** (emphasis added) change in the environment," the Project's impact would not be significant compared to the 1,500-tpd because GHG emissions would not increase.

7.5 References

California Climate Action Registry (CCAR). 2008. General Reporting Protocol. April.

Governor's Office of Planning and Research (OPR). 2008. *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. June.

SCAQMD. 2008a. *SCAQMD, On-road Mobile Source Emissions Factors* (Scenario Years 2007 – 2026) [Excel Posting]. Retrieved September 23, 2008. http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html

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USEPA. 2007. *Climate Change – Waste, WAste Reduction Model (WARM)*. August, 2006. Accessed on January 16, 2008. http://www.epa.gov/climatechange/wycd/waste/calculators/Warm_home.html.

SECTION 8

Environmental Justice

8.1 Introduction

This section discusses issues related to environmental justice (EJ) which is defined as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (Clinton, 1994).

8.2 Regulatory Setting

The following discussion is incorporated from the *Bradley Landfill and Recycling Center Transition Master Plan EIR* prepared by Christopher A. Joseph and Associates, December 2005.

8.2.1 Federal Regulations

On February 11, 1994, President Clinton signed Executive Order 12898 (EO 12898) pertaining to EJ. This EO directs all federal agencies "to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low income populations…" This EO designates USEPA to coordinate the development of guidance criteria by federal agencies to implement this EO. The EPA guidance establishes a five-step process: (1) identifying the affected population, (2) determining the demographic characteristics of the affected population, (3) determining the universe of facilities and affected populations, (4) conducting a disparate impact analysis, and (5) determining the significance of the disparity.

8.2.2 State Regulations

At the state level, there are several regulations related to EJ:

- California Government Code Section 65040.12 defines EJ and designates the Governor's Office of Planning and Research (OPR) as the agency responsible for coordinating environmental justice concerns. Section 65040.2 tasks OPR with the requirement to develop EJ guidance for General Plans.
- California Public Resources Code Section 71110 et. seq. establishes an EJ program for the California Environmental Protection Agency (CalEPA). The CalEPA program establishes an Interagency Working group and multi-stakeholder Advisory Committee to guide program and policy development of an EJ strategy. This strategy was released for public comment in April 2004 and subsequently incorporated in a CalEPA Draft EJ Strategy document released for public comments in July 2004. This document was followed by a Draft CalEPA EJ Action Plan (August 2004). Based on this activity, the CIWMB is

determining how to implement these plans and policies into their own procedures and to identify reasonable and cost-effective approaches to prevent or eliminate adverse impacts.

8.2.3 Local Regulations

Starting in November 2003, a motion was introduced to the Los Angeles City Council to designate a portion of the Sun Valley area as an Environmental Justice Improvement Area. The affected area is bounded by Glenoaks Boulevard to Sunland/Boulevard/Vineland to Strathern Street to Lankershim Boulevard to Haddon Avenue to Montague Avenue to Glenoaks Boulevard. The Project site falls just outside of this boundary.

8.3 Analysis Methodology

8.3.1 Methodology

This Project is not subject to the requirements of Executive Order 12898 because no federal agency action is necessary. However, in response to community concerns and in the absence of other established analytical procedures, USEPA methodology is used below to assess the EJ impacts of the Project. The USEPA five-step methodology is discussed above under Federal Regulations.

The area of impact for the proposed Project includes census tracts within an approximately 3-mile radius of the Project site. This distance was selected because it encompasses a broad collection of residential areas in the vicinity of the Project site. To define the area too narrowly would focus the analysis on residential areas in the immediate vicinity of the site, but not necessarily on all areas potentially impacted by the Project. A determination was then made as to whether any given tract constituted a minority or low-income population. Census tract information was based upon the 2000 Census, the most recent federal demographic data for the affected area (US Census Bureau, 2007).

The USEPA guidance identifies the following as minority classifications: American Indian (including Eskimo and Aleut), Asian, Hispanic, Black/African American, Pacific Islander, and other non-white. According to the USEPA guidance, a minority population exists if the total minority population of the affected area exceeds 50 percent or is meaningfully greater than the minority population percentage in the general population or community of comparison.

The EPA Guidelines recommend that low income status be determined by the application of either the Department of Health and Human Services poverty guidelines or the statutory definition for very low income used by the Department of Housing and Urban Development for housing benefit purposes. The USEPA Guidelines do not, however, provide guidance as to the percentage of low-income residents necessary or appropriate to classify an area as "low-income." For purposes of this analysis, low income is based on 2000 Census data regarding household poverty status, which uses a two dimensional matrix involving 48 thresholds (or income cutoffs), family size, presence of children, and age to determine poverty status (US Census Bureau, 2007).[1] The numerous thresholds used in the

[1] Poverty Status in 1999; linked via Table P90.

U.S Census Bureau determination of poverty status are considered to be the original version of poverty measure by the U.S. Department of Heath and Human Services. At the census tract level, a community is determined to be low-income if the percent of population below poverty level is greater than at the wider county level.[2] The 2000 Census data for Los Angeles County shows 474,533 households out of 3,136,279, or 15.1 percent, as below the poverty level. Census Tracts with more than 15.1 percent of total households living below the poverty level qualify in this analysis as having disproportionately high poverty rates.

Table 8-1 lists the census tracts within approximately 3 miles of the Project site as well as the percentage of minority populations in each census tract and the percentage of households with incomes below the poverty level. If the census tract meets one of the two criteria above (more than 50 percent total minority population or a greater percent of the population below the poverty level than LA County), this data is bolded in Table 8-1. **Figure 8-1** shows the selected census tracts that are within the Project vicinity (approximately 3 miles from Project site).

As can be seen in **Table 8-1**, only three census tracts (CT 1021.01, CT 1021.02, and CT 1033.00) do not meet one of these two criteria. These census tracts are more affluent with smaller minority populations (less than 50 percent) and are located in the less densely populated hills west of the Project site as seen in **Figure 8-1**.

As shown in **Table 8-1** and **Figure 8-1**, the area immediately surrounding the Project site and the areas to the west, north, and south are considered minority, low-income, or both in accordance with the methodology explained above. Census tracts which meet one or both of these criteria include CT 1047.02, CT 1210.10, CT 1211.00, CT 1212.10, CT 1212.20, CT 1218.00, CT 1219.00, 1221.10 and CT 1222.00.

The second step in the determination of environmental justice implications of a project is to determine whether the project would have any significant adverse effects and if these impacts would disproportionately affect minority and low-income populations.

Environmental Justice Effects of the Project

Discussions of impacts related to the Project are found in Section 3 of this EIR. In summary, the only impacts that cannot be mitigated to less than significant levels are Project emissions of VOC and NO_x when compared to the 400-tpd baseline. All impacts related to the 1,500-tpd baseline can be mitigated to less than significant levels. These emissions contribute to basinwide issues related to the attainment of air quality standards. Because the pollutants in question (VOCs and NO_x) have uniform impacts throughout the air basin, these emissions do not disproportionately affect the area in the immediate vicinity of the landfill.

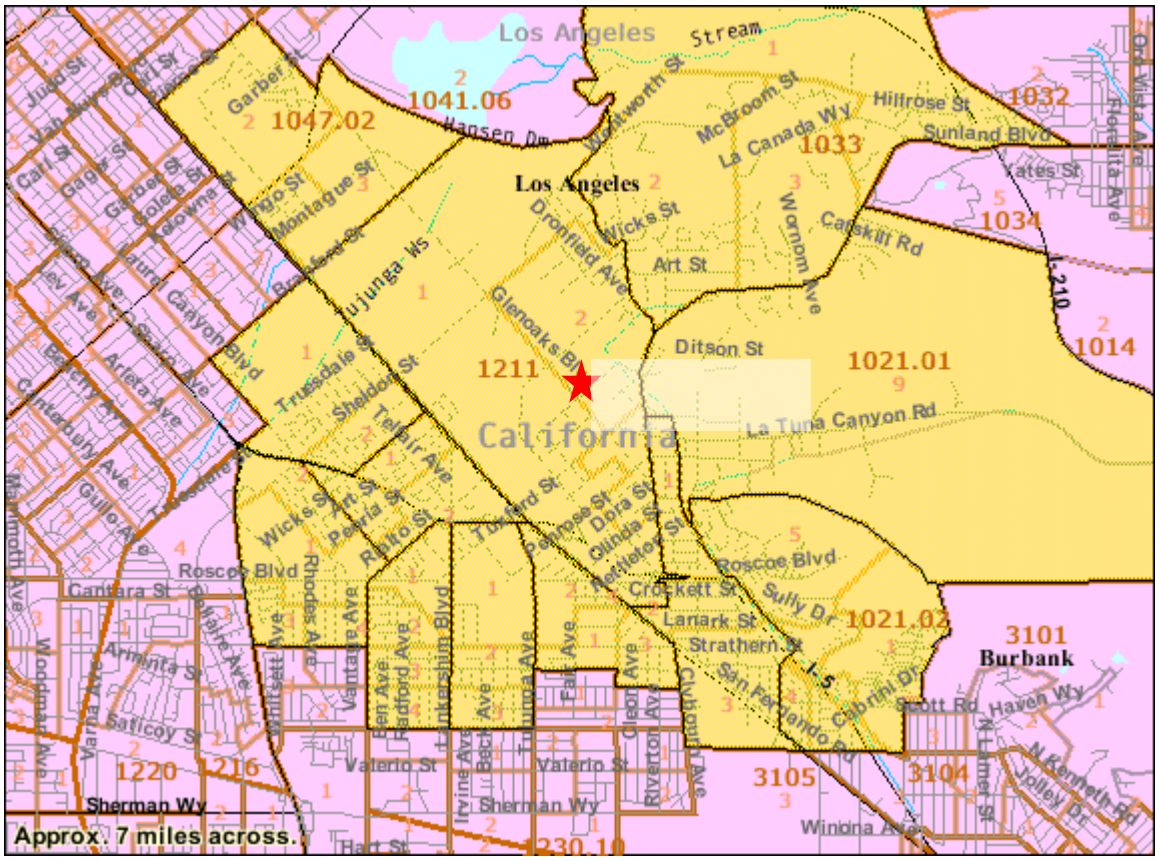
[2] The practice of using a CoC (community of comparison) or RoC (region of comparison) to determine if a community has a disproportionately high incidence of poverty/low-income households was established by President Clinton's 1994 Executive Order 12898 on Environmental Justice.

TABLE 8-1
Population, minority population and population in poverty within the Project vicinity by census tract(within approximately 3 miles of Project site)

		Percentages									
Census Tract	**Population**	**White**	**Hispanic**	**Black/African American**	**Asian**	**American Indian**	**Pacific Islander**	**Other Non-White**	**Two or More Races**	**Total Minority**	**Households Below Poverty Level**
1021.01	3,387	62.6	27.0	2.0	5.3	0.4	0.1	0.4	2.2	37.4	11.1
1021.02	6,739	53.9	30.2	2.0	10.0	0.4	0.1	0.1	3.4	46.1	6.9
1033.00	3,739	78.6	13.7	1.0	3.0	0.4	0.1	0.5	2.8	21.4	6.9
1047.02	6,262	8.2	73.7	14.7	1.4	0.6	0.03	0.2	1.2	**91.8**	**20.6**
1210.10	4,535	26.8	55.0	1.7	10.7	0.3	0.8	0.04	4.7	**73.2**	12.7
1211.00	4,315	29.5	59.6	1.3	7.0	0.1	0.05	0.5	1.9	**70.5**	**20.2**
1212.10	4,853	11.2	77.4	2.2	7.4	0.4	0.02	0.1	1.3	**88.8**	**21.7**
1212.20	4,110	12.3	78.9	0.7	6.2	0.1	0.4	0.2	1.2	**87.7**	**17.0**
1218.00	7,451	14.7	72.7	3.9	6.2	0.2	0.03	0.2	2.1	**85.3**	**17.1**
1219.00	4,262	14.7	74.8	0.9	7.1	0.3	0.05	0.05	2.0	**85.3**	**19.2**
1221.10	5,421	11.0	79.5	1.5	6.4	0.1	0.1	0.2	1.2	**89.0**	**24.3**
1222.00	5,607	15.5	76.1	1.7	4.9	0.3	0	0.1	1.4	**84.5**	**17.8**

Note: Bold text indicates a “minority” or “low-income” population in the census tract.

FIGURE 8-1 Census Tracts Within 3 Miles of Bradley Landfill



Cumulative Environmental Justice Effects of the Project

As shown in the traffic section of the EIR (Section 3.6), the traffic generated by the related projects in the vicinity of the Project site will result in significant cumulative impacts. These impacts are intersection specific and, therefore, will disproportionately affect the area in the immediate vicinity of the landfill. The traffic section of the EIR identifies the mitigation measures necessary to reduce these impacts to less than significant levels.

When environmental justice concerns are viewed in terms of the Sun Valley—La Tuna Canyon Community Plan, cumulative development does not appear to result in significant impacts. The Project site and the area immediately surrounding the Project site are planned and zoned for industrial use in an area that has been the location of relatively heavy industrial use over the years. The Community Plan calls for the concentration of industrial use in these areas and at the same time plans to accommodate the residential development that occurs in the immediate vicinity of the Project site.

As indicated in the *Bradley Landfill and Recycling Center Transition Master Plan EIR,* there are two approaches that can be used to address these effects on these residential communities. First, individual industrial uses can implement measures to reduce their impacts over time. Such measures can be identified and incorporated into existing uses through compliance with environmental regulations and requirements without "grandfathering" existing uses. NPDES stormwater compliance, applicable to many industrial uses, is an example of an environmental program to improve stormwater quality from existing uses. For new uses, the City can use the CEQA process to require the implementation of feasible mitigation measures to reduce impacts of industrial projects on nearby residential uses.

Second, as past and present uses turn over and are replaced by new uses, and new uses are required to comply with current and emerging environmental regulations and could be uses that are generally less impactful (for example, light industry rather than heavy industrial). A transition to lighter industrial uses could occur through the long-range planning mechanisms available to the City; that is, through the amendment of the Sun Valley—La Tuna Canyon Community Plan and zoning ordinance.

An initial step in this direction is the possible formation of the Sun Valley Environmental Justice Area pursuant to the City Council motion above. The Project site and of the other related projects are located in this area.

It should be noted that this Project will contribute to the transition from older less regulated industrial uses to a much more modern facility. As described in the Project description (Section 2) and several other places in the text, the Project will result in substantially less impacts than if the Project was developed in accordance with its current entitlement (1,500 tpd C&D). With implementation of the Project, operations at the Project site will transition to indoor processing with odor and dust control achieved with negative air pressure and misting systems.

8.4 References

US Census Bureau. 2007. *American FactFinder.* http://factfinder.census.gov

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SECTION 9

List of Preparers/Organizations Consulted

9.1 Lead Agency Personnel

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9.3 Persons and Organizations Consulted

People and organizations consulted in preparing each section of the EIR are identified in footnotes in the sections where information they provided is used.

SECTION 10

Acronyms and Abbreviations

AADT	Average Annual Daily Traffic
AB 939	Assembly Bill 939, Integrated Waste Management Act of 1989
ADC	Alternative Daily Cover
ADT	Annual Daily Traffic
AQMD	air quality management districts
AQMP	Air Quality Management Plan
ATCM	Airborne Toxic Control Measures
ATCP	Air Toxics Control Plan
ATCS	Adaptive Traffic Control System
AWI	American Waste Industries
CAL EPA	State of California, Environmental Protection Agency
Caltrans	State of California, Department of Transportation
C&D	construction, demolition and inert materials
CAA	Clean Air Act
CAAQS	California ambient air quality standards
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
City	City of Los Angeles
CIWMB	California Integrated Waste Management Board
CMA	Critical Movement Analysis
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level

CNPS	California Native Plant Society
CO_2	carbon monoxide
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DEIR	Draft Environmental Impact Report
EAD	City of L.A., Environmental Affairs Department
EIR	Environmental Impact Report
EF	emission factors
EJ	Environmental Justice
EO	Executive Order
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
FESA	Federal Endangered Species Act
FCMP	Fire Control and Mitigation Plan
GHG	greenhouse gas
HAP	Hazardous Air Pollutants
HHW	Household Hazardous Waste
HRA	Health Risk Assessment
HWC	Highway Capacity Manual
kW	kilowatt
LADOT	City of Los Angeles Department of Transportation
lbs	pounds
L_{dn}	Day-Night Sound Level
L_{eq}	Equivalent Noise Level
LEA	Local Enforcement Agency
LOS	Level of Service
$\mu g/m^3$	micrograms per cubic meter

MATES II	Multiple Air Toxics Exposure Study II
mgd	million gallons per day
mg/L	milligrams per liter
MND	Mitigated Negative Declaration
MRF/TS	Material Recovery Facility/Transfer Station
MSW	municipal solid waste
NAAQS	National Ambient Air Quality Standards
NO	nitric oxide
NO_2	nitrogen dioxide
NO_X	nitrogen oxide
NOD	Notice of Determination
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCE	Passenger Car Equivalent
PM	particulate matter
PM_{10}	particulate matter under 10 microns in diameter
$PM_{2.5}$	particulate matter under 2.5 microns in diameter
ppm	parts per million
PRC	Public Resources Code
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SHPO	State Historic Preservation Offices
SIP	state implementation plan

SO_2	sulfur dioxide
SO_X	oxides of sulfur
SWCV	solid waste collection vehicle
SWFP	Solid Waste Facility Permit
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SUSWMP	Standard Urban Storm Water Mitigation Plan
SVLTCCP	Sun Valley—La Tuna Canyon Community Plan
TAC	Toxic Air Contaminant
TDS	total dissolved solids
TNM	Traffic Noise Model (TNM)
TPD	tons per day
Thresholds Guide	L.A. CEQA Thresholds Guide: Your Resource for Planning for Preparing CEQA Analyses in Los Angeles
TSP	total suspended particulate
TSS	total suspended solids
USFWS	Fish and Wildlife Service
USGS	United States Geological Survey
V/C	volume-to-capacity
VOC	volatile organic compounds
VPD	vehicles per day
VPH	vehicles per hour