6.0 ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to avoid or substantially reduce the significant environmental impacts of the project while still meeting the general project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Proposed Project

Title 14, Article 9, Section 15126.6(a) of the CEQA Guideline states: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature and scope of the alternatives to be discussed other than the "rule of reason".

Purpose

Title 14, Article 9, Section 15126.6(b) of the CEQA Guidelines states: "Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly."

Selection of a Reasonable Range of Alternatives

Title 14, Article 9, Section 15126.6(c) of the CEQA Guidelines states: "The range of potential alternatives to the Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

Overview of Selected Alternatives

The following alternatives were selected by the City of Los Angeles for the Proposed Project. The alternatives to be analyzed in comparison to the Proposed Project include the following:

Alternative A: No Project Alternative

Alternative B: Reduced Transitional Vertical Expansion – 19' Increase

Alternative C: Reduced Transfer Station Alternative

Alternative D: Transfer Station Only, No Vertical Expansion

Alternatives Rejected as Being Infeasible

As described above, Title 14, Article 9, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Consideration was not given to alternative locations for the Proposed Project because the project applicant does not own nor can the applicant reasonably acquire or otherwise have access to alternative sites for the Proposed Project in the City of Los Angeles (California Code of Regulations, Title 14, Chapter 3, Article 9, State CEQA Guidelines Section 15126.6(f)). Although the project applicant owns other sites outside the City of Los Angeles, these sites are located in outlying areas. Construction of a transfer station in an outlying area is an infeasible means of consolidating loads for disposal that are generated in the City of Los Angeles and the region.

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the Proposed Project, and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. Impacts associated with the alternative are compared to project-related impacts and are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the Proposed Project.

The following alternatives analysis compares the potential environmental impacts of four alternatives with those of the Proposed Project for each of the environmental topics analyzed in detail in Section 4.0 (Environmental Impact Analysis) of the EIR.

ALTERNATIVES

Alternative A - No Project Alternative

The "No Project" analysis must discuss the existing conditions at the time the Notice of Preparation (NOP) is published as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the alternatives. (CEQA Guidelines § 15126.6, subd. (e)(2).)

Under Alternative A, no transitional vertical expansion would occur and the proposed TS/MRF would not be constructed. The landfill would continue to operate under its current permits until April 14, 2007, and would then be closed in accordance with the requirements of current regulations. Activities on Bradley East would continue at their current levels in accordance with SWFP No. 19-AR-0004, which would not expire. Expansion of green and wood waste operations would not occur. Because generation of waste would continue to occur in the City of Los Angeles and elsewhere in the region, when the landfill closes in 2007, solid waste currently handled at BLRC would need to be disposed at other regional landfills. To the extent that capacity is available, loads could be consolidated at other transfer stations for transport to outlying landfills. However, as such existing facilities reach capacity, alternative methods would need to be developed to move large quantities of waste to landfills outside the City of Los Angeles. Alternatively, the City of Los Angeles, at the direction of the City Council, has begun to explore other advanced technologies for processing the City's solid waste that do not involve landfilling. While this process will likely require many years to implement, it offers the opportunity to substantially reduce the amount of waste that will need to be transported to outlying landfills in the future.

Land Use and Planning

The existing BLRC is compatible with the immediately surrounding land uses and consistent with the applicable policies and goals identified in Section 4.2. Continued operation of the existing landfill until the expiration of its permit on April 14, 2007 would not change the compatibility of the landfill with surrounding uses or the landfill's consistency with applicable plans and policies. Under the No Project Alternative, none of the activities proposed in the Proposed Project would occur with the exception of closing the landfill. The closed landfill would be compatible with the surrounding uses and would meet most of the policies and goals identified in Section 4.2 with the exception of those pertaining to solid waste. Therefore, land use impacts under the No Project Alternative would be less than the Proposed Project.

Transportation and Circulation

Under the No Project Alternative, the traffic levels at the landfill would continue at the present level (existing 2005) until it is closed in 2007. Some increase in traffic levels would be expected during the course of the landfill closure from trucks bringing in clean soil for the four-foot closure cap. Upon completion of closure activities, no traffic, including trash or transfer truck trips, would be generated by the Bradley Landfill. Solid waste generated in the City of Los Angeles that is currently disposed of at the BLRC would need to be disposed of at other area landfills that are located at a greater distance (up to approximately 120 miles) from the City of Los Angeles. In addition, under the No Project Alternative,

the air quality and traffic benefits of consolidating trash loads into transfer trucks and reducing the overall number of truck trips to outlying landfills may not be realized, depending upon whether capacity is available at other transfer stations in the City of Los Angeles and Southern California. This could potentially result in an increase in the number of truck trips, trip lengths and greater truck traffic on freeways serving the outlying areas than would occur under the Proposed Project. Regardless, under the No Project Alternative, as other landfills in the City of Los Angeles reach capacity and close, there will be a need to transport waste greater distances to outlying landfills. However, in the event that the City is successful in implementing alternative technologies for processing solid waste, which could occur under the No Project Alternative, the total amount of waste required to be landfill could drop substantially. In this event, the traffic impacts of the No Project Alternative would be lower than the Proposed Project. The short-term increase in traffic due to closure activities would be similar to the impacts under Phase II (2008) of the Proposed Project. However, long-term traffic impacts under the No Project Alternative could potentially be greater than the Proposed Project as a result of increased traffic to the outlying landfills and the resulting additional local route trucks required to service businesses, residences, and construction sites, unless additional long-term transfer capacity is provided in the City or elsewhere in the region, or the City is successful in implementing alternative methods of dealing with the City's solid waste generation.

Air Quality

Under the No Project Alternative, the existing landfill would close when it reaches its current maximum capacity on or before April 14, 2007. Upon closure of the landfill, all solid waste would be redirected to other regional landfills. These other landfills are located in areas such as the Antelope Valley (e.g., the Antelope Valley and Lancaster Landfills) and could also include the Sunshine Canyon, El Sobrante, and Chiquita Landfills. Shipping the solid waste out to these facilities would increase the trip lengths and number of trips as larger transfer trucks would not be utilized and thereby would increase regional air quality emissions. Activities associated with the closure of the landfill (e.g., installing the soil cap and planting vegetation) would generate air emissions associated with the trucks and other equipment. These emissions would be the same as those identified under the Proposed Project. No other project activities would occur and no other emissions would be generated. Therefore, short-term air quality emissions under the No Project Alternative would be slightly less than those under the Proposed Project. Long-term air quality emissions would be greater under the No Project Alternative than under the Proposed Project because of the increased number of trash truck trips that would have to transport MSW on long-hauls to other regional landfills.

Noise

Under the No Project Alternative, the existing landfill would be closed when it reaches its maximum capacity on or before April 14, 2007. The only project activities which would occur are those associated with the landfill closure. Noise impacts would be generated from the trucks and equipment used to accomplish these closure activities. However, due to the distance from any receptor sources these impacts would be less than significant and similar to the Proposed Project. Additionally, the gas

produced by the closed landfill would continue to be flared off as necessary. These flares produce noise, but the noise would not be a change from the existing conditions.

No other project activities would occur (e.g., no truck trips associated with the new TS/MRF) and therefore, no noise impacts would be generated by the landfill after its closure. Therefore, long-term noise impacts under the No Project Alternative would be less than those associated with the Proposed Project.

Aesthetics/Views

Under the No Project Alternative, the existing BLRC would be closed when it reaches its permitted capacity on or before April 14, 2007 and would have a maximum height of 1,010 feet above msl. The closure activities would include installation of final cover, planting of vegetation on all slopes, and constructing surface water control structures. The maximum height of the closed landfill would not be much higher than currently exists and would not block any views of the mountains from the surrounding land uses. Views of the closed landfill would be primarily of a large, slightly sloping mound. This mound would be vegetated similarly to the slopes of the landfill at the intersection of Glenoaks Boulevard and Peoria Street. Therefore, no change would occur with respect to existing views of the landfill and impacts to views under the No Project Alternative would be less than the Proposed Project.

No new sources of light or glare would be introduced to the project site under the No Project Alternative. Trucks and other equipment would be present during the final closure activities (see Section 3.0). Upon completion of landfill closure activities, no sources of light or glare would be located on the project site. Therefore, light and glare impacts under the No Project Alternative would be less than the Proposed Project.

Geology and Soils

Under the No Project Alternative, the maximum height of the landfill would not be increased and the new TS/MRF would not be constructed. Therefore, no erosion or slope stability impacts would occur as a result of these activities and impacts would be less than the Proposed Project.

The existing landfill would be closed when it reaches its current permitted capacity on or before April 14, 2007. Final closure activities would include earth movement activities which would have the potential to expose large areas to the potential effects of soil erosion. Similar to the Proposed Project, these activities are regulated by conditions established in the landfill's existing Zoning Variances and in grading permits. Therefore, these potential soil erosion impacts would be the same as those discussed under the Proposed Project.

All grading associated with the importation and dumping of soils/inert materials, installation of soil cap, planting vegetation and construction of surface water control structures will require that the necessary permits be obtained from the Department of Building and Safety, and that the grading operations conform to all requirements of the City's Building Code. As such, the proposed final landfill cover would not

represent soil that is unstable or would be unstable as a result of the project and potentially result in collapse. Impacts from the No Project Alternative would be the same as those identified for landfill closure under the Proposed Project. Overall, erosion and slope stability impacts associated with the No Project Alternative would be slightly less (due to the lack of construction activities associated with the new TS/MRF) than those associated with the Proposed Project.

Hydrology/Water Quality

Under the No Project Alternative, the landfill would operate until its current closure date of April 14, 2007. No construction activities, expansion of existing operations, or installation of additional holding tanks would occur. All hydrology and water quality impacts associated with the continued operation of the landfill would be the same as the existing conditions. The current procedures utilized to control surface/stormwater water runoff and protect water quality would continue to be implemented. No construction activities would occur which could impact water quality. Closure of the landfill would require earth moving activities for the application of the four foot cap and the planting of vegetation. These activities would be in compliance with the conditions listed in the grading permit as required by the Department of Building and Safety. Therefore, impacts to hydrology and water quality would be less than the Proposed Project.

Hazardous Materials

Under the No Project Alternative, the Bradley Landfill would continue to accept solid waste until it reaches its current permitted capacity (on or before April 14, 2007), at which time it would close. The Bradley Landfill does not accept hazardous waste and has existing measures in place to ensure that hazardous wastes do not enter the landfill. These procedures would remain in place until the landfill is closed. However, because less waste would be accepted for disposal in the landfill, the potential for hazardous waste to enter the landfill undetected would be lower under the No Project Alternative as compared to the Proposed Project.

After closure of the landfill, no solid waste of any kind would be accepted at Bradley Landfill and therefore, the possibility of introducing hazardous materials would be less than the Proposed Project. No construction activities, operation of the new TS/MRF, or expansion of the green and wood waste would occur under the No Project Alternative. Therefore, no hazardous materials would be utilized on the project site and impacts would be similar to those under the Proposed Project.

Utilities (Wastewater)

Under the No Project Alternative, leachate generated by the decomposition of landfilled material would continue to be collected through the existing wastewater (leachate) collection and disposal system. This collected leachate would continue to be discharged to the existing public sanitary sewer system under the conditions of the landfill's industrial wastewater discharge permit issued by the Regional Water Quality Control Board. However, the amount of leachate generated would be less than that under the Proposed Project as the total amount of landfilled material would be less.

Additionally, the amount of wastewater generated through employee use would decrease upon complete closure of the landfill due to the decrease in the number of employees on-site. Therefore, wastewater impacts associated with the No Project Alternative would be less than those associated with the Proposed Project.

Alternative B - Reduced Transitional Vertical Expansion – 19' Increase

Under Alternative B, the proposed transitional vertical increase would be reduced from the proposed 43-foot increase to a 19-foot increase. All other components of the Proposed Project would remain the same, including reducing maximum daily input to 7,000 tpd from the currently permitted level of 10,000 tpd[1]. The proposed TS/MRF would be constructed, and the green and wood waste and Phase I MRF operations would be expanded. Closure activities would take place at the landfill in accordance with regulatory requirements as soon as the capacity provided by the reduced transitional vertical expansion is reached, which would in all likelihood be prior to, but in any event, no later than April 14, 2007.

Land Use and Planning

Alternative B would be identical to the Proposed Project with the exception of the maximum height of the existing landfill. Under this alternative, the height of the landfill would be increased by 19 feet to a maximum of 1,029 feet above msl. Similar to the Proposed Project, this alternative would be compatible with the surrounding land uses and consistent with the applicable plans and policies identified in Section 4.2 of this EIR. Since the same project activities would occur under Alternative B, land use and planning impacts under Alternative B would be similar to those identified under the Proposed Project.

Transportation and Circulation

Alternative B would be identical to the Proposed Project with the exception of the maximum height of the existing landfill. Under this alternative, the height of the landfill would be increased by 19 feet to a maximum of 1,029 feet above msl. The level of traffic generated by the landfill would be expected to be the same as that generated under Phase I of the Proposed Project, until maximum capacity is reached. This is due to the fact that the amount of trash accepted on a daily basis would be the same as under the Proposed Project, however, the maximum capacity would be reached sooner and therefore, the amount of time in which additional truck trips are realized would be less. Under this portion of Alternative B, five intersections would be significantly impacted. Upon closure of the landfill and conversion to the TS/MRF, traffic impacts are expected to be the same as the Proposed Project, with two intersections being significantly impacted.

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[1] *Alternatively, the daily input could be reduced in order to extend the life of the landfill to the April 14, 2007 expiration date. However, the analysis of this alternative is based on the permitted daily intake of 7,000 tpd. If the daily intake were to be reduced, the impacts of this alternative would be reduced but the time frame in which the impacts occur could be extended.*

Air Quality

Under Alternative B, the maximum height of the existing landfill would be increased by 19 feet and all activities proposed in Phase II would remain the same. Disposal of solid waste would continue to occur at Bradley Landfill until its closure date of April 14, 2007 or before if maximum capacity is reached. Air emissions would be generated during Phase I by the construction of the new TS/MRF facility. Air emissions would also be generated by the shipping of solid waste to other facilities in the event that the landfill closes prior to April 14, 2007. If the landfill closes early, the trip length for solid waste disposal would increase and thereby increase the regional air emissions that are generated. These impacts would be greater than those identified under the Proposed Project. Production of landfill gas would be lower under the alternative (see Appendix F) compared to the Proposed Project, and, even though gas levels would increase, the increase would be lower than the peak gas generation from the landfill which occurred in 2002, thereby reducing potential surface emissions. Landfill gas produced under this alternative would be within the capacity of the existing landfill gas collection and control system. During Phase II, the solid waste would be consolidated at the transfer station before being shipped to other locations and landfill closure activities would occur. These activities are the same as those identified in the Proposed Project and therefore, the air quality impacts associated with Alternative B under Phase II would be the same as those under the Proposed Project.

Noise

Under Alternative B, the existing landfill would continue to operate until it reaches its capacity with the 19 foot expansion on or before April 14, 2007. Noise would be generated by the trash trucks on the roadways and equipment on the landfill. However, the noise generated by landfilling operations would be less under this alternative than under the Proposed Project because less trash would be brought to the landfill on a daily basis. In addition, noise would be generated by the flares and the construction activities for the new TS/MRF. During Phase II, noise would be generated by the operation of the new TS/MRF and the activities required to close the landfill in accordance with applicable regulations. These noise impacts under Alternative B are anticipated to be the same as those described under the Proposed Project.

Aesthetics/Views

Project activities under Alternative B would be identical to the Proposed Project with the exception of the maximum height of the landfill. Under Alternative B, the height of the landfill would be raised by 19 feet for a maximum height of 1,029 feet above msl. All other activities associated with this alternative would remain the same as the Proposed Project.

The same visual simulation study was conducted for this alternative as was conducted under the Proposed Project. Photographs from the eight study locations (see Figure 4.6-10 in Section 4.6) were taken and the proposed elevations of the landfill under this alternative were laid on top. Figures 6.1 through 6.8 show the before and after photographs from each of these locations. As can be seen in these photographs, the views from locations 1 and 2 are not affected by the 19 foot increase. The views from locations 3 and 4 would be partially blocked by the 19 foot expansion of the landfill, but portions of the mountains would

still be visible in the background. The 19 foot landfill expansion would make the views of the landfill more visible from locations 5 through 7 but would not block any mountain views, as the mountains are not visible from these locations. The view from location 8 would include a slightly larger landfill view. However, the increase in the height of the landfill does not block the views of the mountains from this location.

The impacts associated with view blockage under this alternative would be less than those associated with the Proposed Project. This alternative would reduce the significant and unavoidable impact identified under the Proposed Project to less than significant levels. Since no other aspects of this alternative would differ from the Proposed Project, impacts associated with light and glare would be the same.

Figure 6-1, Visual Simulation Photographs of Alternative B, Location 1

Figure 6-2, Visual Simulation Photographs of Alternative B, Location 2

Figure 6-3, Visual Simulation Photographs of Alternative B, Location 3

Figure 6-4, Visual Simulation Photographs of Alternative B, Location 4

Figure 6-5, Visual Simulation Photographs of Alternative B, Location 5

Figure 6-6, Visual Simulation Photographs of Alternative B, Location 6

Figure 6-7, Visual Simulation Photographs of Alternative B, Location 7

Figure 6-8, Visual Simulation Photographs of Alternative B, Location 8

Geology and Soils

Under Alternative B, all aspects of the Proposed Project would remain the same with the exception of the maximum height of the landfill. Under this alternative, the height of the landfill would be increased by 19 feet to a maximum height of 1,029 feet above msl. All procedures regulating the operation of the existing landfill would remain in place to control the possibility of erosion and slope stability associated with earth moving activities. All earth moving impacts associated with the construction of the new TS/MRF, closure of the landfill and expansion of the green and wood waste would be the same as those identified under the Proposed Project. Therefore, geology and soils impacts associated with Alternative B would be the same as those under the Proposed Project.

Hydrology

Under Alternative B, all aspects of the Proposed Project would remain the same with the exception of the maximum height of the landfill. Under this alternative, the height of the landfill would be increased by 19 feet to a maximum height of 1,029 feet above msl. The same procedures for controlling stormwater runoff and protecting water quality that are currently used would continue to be used under Alternative B. In addition, any construction that requires earth moving activities would comply with all applicable State and federal regulations, including NPDES, and the conditions listed on the grading permit as required by the Department of Building and Safety. Therefore, impacts to hydrology and water quality under Alternative B would be similar to the Proposed Project.

Hazardous Materials

Under the Alternative B, the Bradley Landfill would continue to accept solid waste until its existing permit expires on April 14, 2007, at which time it would close. The Bradley Landfill does not accept hazardous waste and has measures in place to ensure that hazardous wastes do not enter the landfill. These procedures would remain in place until the landfill is closed. Therefore, hazardous materials impacts associated with the continued operation of the landfill under Alternative B would be the same as those identified for the operation of the existing landfill under Phase I of the Proposed Project.

No hazardous materials would be required for the construction of the new TS/MRF or expansion of the green and wood waste facility. Operation of the new TS/MRF would utilize the same procedures as the existing landfill to prevent hazardous materials from entering the TS and being sent to other landfills. Landfill gas production would be lower under this alternative and landfill gas would continue to be handled by the existing landfill gas collection and control system. Therefore, hazardous materials impacts would be the same as those identified under the Proposed Project.

Utilities (Wastewater)

Under Alternative B, leachate generated by the decomposition of landfilled material would continue to be collected through the existing wastewater (leachate) collection and disposal system. This collected leachate would continue to be discharged to the existing public sanitary sewer system under the

conditions of the landfill's industrial wastewater discharge permit issued by the Regional Water Quality Control Board. Due to the proposed increase in height of the landfill by 19 feet, additional water would be present in the landfill trash. This increase in water would generate a slight increase in the amount of leachate generated by the landfill. However, the amount of leachate generated would be less than the amount generated under the Proposed Project. Therefore, leachate impacts would be slightly less under Alternative B than under the Proposed Project.

Since no other aspects of the Proposed Project would change under Alternative B, the same number of employees would be on site and would generate the same amount of wastewater from the use of restrooms, etc. Therefore, impacts from wastewater generation would be the same under Alternative B as under the Proposed Project.

Alternative C - Reduced Transfer Station Alternative

Under Alternative C, the proposed TS/MRF capacity (throughput) would be reduced by 25 percent, to a 3,000 tpd TS and 750 tpd MRF. All other components of the Proposed Project would remain the same. Green and wood waste and Phase I MRF operations would be expanded. The proposed 43-foot transitional vertical expansion would occur and closure activities would take place on the landfill in accordance with regulatory requirements as soon as the capacity provided by the transitional vertical expansion is reached, no later than April 14, 2007.

Land Use and Planning

Phase I of Alternative C would be identical to the Proposed Project. This Phase would be compatible with the surrounding land uses and consistent with the applicable goals and policies previously identified. Therefore, land use and planning impacts associated with Phase I of Alternative C would be the same as those identified under the Proposed Project.

Phase II of Alternative C would be the same as the Proposed Project, except the throughput of the new TS/MRF would be reduced by 25%. However, this reduction in the capacity of the new TS/MRF would not change the compatibility of the BLRC with the surrounding land uses or the project's consistency with the applicable goals and policies. Therefore, land use and planning impacts associated with Phase II of Alternative C would be the same as those identified under the Proposed Project.

Transportation and Circulation

Under Phase I of Alternative C, the landfill's maximum height would still be expanded by 43 feet to 1,053 feet above msl. Traffic associated with this portion of the Proposed Project would remain the same with five intersections significantly impacted. Under Phase II, the existing landfill would be closed and operation of the new TS/MRF would begin. Traffic associated with the closure activities would remain the same as under the Proposed Project. However, it is anticipated that traffic generated by the operation of the new TS/MRF would be approximately 25% less due to the reduction in capacity of the facility.

Therefore, while short-term traffic impacts under Alternative C would be the same as the Proposed Project, the long-term impacts would be less than the Proposed Project.

Air Quality

Under Alternative C, Phase I would be identical to the Proposed Project. Air quality impacts associated with this phase are expected to be similar to those identified under the Proposed Project. During Phase II, the solid waste would be consolidated at the transfer station before being shipped to other locations and landfill closure activities would occur. However, the throughput of the new TS/MRF would be reduced by 25% under this alternative. Since the TS under this alternative would not be able to process the same quantity of solid waste per day, it is possible that more trips to outlying area landfills by trash trucks would be required, in the event that sufficient transfer capacity is not available for consolidation of loads elsewhere in Los Angeles or the region. In this case, air quality impacts of the Alternative could be greater than the Proposed Project. Alternatively, if, in the long run, the City is successful in reducing the need for landfilling of solid waste or if regional transfer capacity is adequate, the reduction of transfer capacity associated with this Alternative would not have the potential to result in increased traffic generation. In this case, air quality impacts under Phase II of Alternative C would be less than under the Proposed Project.

Noise

Under Alternative C, Phase I would be identical to the Proposed Project. Noise would be generated by the trash trucks on the roadways and equipment on the landfill. In addition, noise would be generated by the flares, and the construction activities for the new TS/MRF. The noise impacts under Alternative C for Phase I are anticipated to be the same as those under the Proposed Project. During Phase II, noise would be generated by the operation of the new TS/MRF and the activities required to close the landfill in accordance with applicable regulations. Since the capacity of the new TS/MRF would be reduced by 25% under this alternative and would not be able to process the same quantity of solid waste, fewer trash and transfer trucks would be entering/exiting the landfill. With fewer trucks utilizing the project site, noise impacts generated by these vehicles are anticipated to be less than the Proposed Project.

Aesthetics/Views

Under Alternative C, Phase I would be the same as the Proposed Project. Therefore, aesthetic impacts (both view blockage and light/glare) under Alternative C would be the same as the Proposed Project. While the capacity of the new TS/MRF would be reduced by 25%, it is not expected to reduce the visual impacts associated with the Proposed Project. The new TS/MRF would be located in an area that is only partially visible from San Fernando Road. The reduction in capacity would not change the amount of the facility that was visible. Additionally, the same sources of light would be required and the same source of glare (e.g., trucks) would still be entering the facility. Therefore, aesthetic/view impacts associated with Phase II under Alternative C would be the same as those identified under the Proposed Project.

Geology and Soils

Phase I of Alternative C would be identical to the Proposed Project. The same activities would occur during this phase and the landfill would continue to use the same procedures that are currently in place to control soil erosion and protect slope stability. Therefore, geology and soils impacts under Phase I of Alternative C would be similar to those identified under the Proposed Project. Under Phase II, all activities would be the same, including landfill closure and new TS/MRF operation. However, the amount of solid waste processed by the TS would be 25% less. The only earth moving activities required would be for the closure of the landfill (e.g, installing the soil cap, planting vegetation, etc.). No earth moving activities would be required for the operation of the new TS/MRF. Therefore, geology and soils impacts associated with Phase II under Alternative C would be the same as those identified under the Proposed Project.

Hydrology

Under Alternative C, all activities associated with the Proposed Project would remain the same except the capacity of the new TS/MRF would be decreased by 25%. The same procedures for controlling stormwater runoff and protecting water quality that are currently used would continue to be used under Alternative C. In addition, any construction that requires earth moving activities would comply with all applicable State and federal regulations, including NPDES, and the conditions listed on the grading permit as required by the Department of Building and Safety. Therefore, impacts to hydrology and water quality under Alternative C would be similar to the Proposed Project.

Hazardous Materials

The same activities would occur under Alternative C as would occur under the Proposed Project. However, the capacity of the new TS/MRF would be reduced by approximately 25%. Under the Alternative C, the Bradley Landfill would continue to accept solid waste until its existing permit expires in April 2007, at which time it would close. The Bradley Landfill does not accept hazardous waste and has measures in place to ensure that hazardous wastes do not enter the landfill. These procedures would remain in place until the landfill is closed. Therefore, hazardous materials impacts associated with the continued operation of the landfill under the Alternative C would be the same as those identified for the operation of the existing landfill under Phase I of the Proposed Project.

No hazardous materials would be required for the construction of the new TS/MRF or expansion of the green/wood waste facility. Operation of the new TS/MRF under Phase II would utilize the same procedures as the existing landfill to prevent hazardous materials from entering the TS and being sent to other landfills. Therefore, hazardous materials impacts would be the same as those identified under the Proposed Project.

Utilities (Wastewater)

Under Alternative C, leachate generated by the decomposition of landfilled material would continue to be collected through the existing wastewater (leachate) collection and disposal system. This collected leachate would be discharged to the existing public sanitary sewer system under the conditions of the landfill's industrial wastewater discharge permit issued by the Bureau of Sanitation. The amount of leachate generated would be the same as anticipated under the Proposed Project. Therefore, leachate impacts under Alternative C would be similar to those identified under the Proposed Project.

Operation of the new TS/MRF is not anticipated to generate any wastewater. A slight decrease in the wastewater generated by employees is anticipated since fewer employees would be needed with reduced capacity of the new TS/MRF. Therefore, impacts from wastewater generation would be slightly less under Alternative C than under the Proposed Project.

Alternative D – Transfer Station Only, No Vertical Expansion

Under Alternative D, no transitional vertical expansion would occur within the landfill. The landfill would close and closure activities would be undertaken on the landfill in accordance with regulatory requirements as soon as the existing capacity is reached, but no later than April 14, 2007. All other components of the Proposed Project would remain the same. The proposed TS/MRF would be constructed, and green and wood waste and Phase I MRF operations would be expanded.

Land Use and Planning

Under Alternative D, the existing landfill would not be expanded. Upon reaching its current maximum height of 1,010 feet msl, the landfill would close. The closed landfill and the proposed TS/MRF would be compatible with the surrounding land uses and consistent with the applicable goals and policies as discussed under the Proposed Project, with the exception of those policies/goals dealing specifically with solid waste. Without the height expansion, the landfill would close sooner than anticipated and new locations for the disposal of solid waste would be required. Therefore, the short-term land use and planning impacts under Alternative D would be slightly greater than the Proposed Project, while the long-term impacts would be the same as the Proposed Project.

Transportation and Circulation

Under Alternative D, the maximum height of the existing landfill would not be expanded. Upon reaching its current maximum capacity, the landfill would be closed. Upon closure solid waste would have to be disposed of at other landfills until the transfer station was completed. Traffic associated with the operation of the landfill is anticipated to be the same (approximately 1,500 tons of MSW per day) as existing conditions until it reaches its maximum height of 1,010 feet msl. Traffic associated with other activities during Phase I are anticipated to remain the same as the Proposed Project (the additional TS/MRF construction traffic). It is therefore anticipated that operation of the landfill until it closes would be lower than the Proposed Project.

All activities associated with Phase II of Alternative D would be the same as those described under the Proposed Project. It is anticipated that two intersections would be significantly impacted under this phase which includes closure activities and operation of the new TS/MRF. Therefore, traffic impacts associated with Phase II of Alternative D would be the same as those under the Proposed Project.

Air Quality

Under Alternative D, the height of the existing landfill would not be increased and the landfill would be closed when it reached its current maximum height of 1,010 feet msl. Phase I of the project would also include the construction of the new TS/MRF. Air emissions would be generated during the utilization of the existing landfill and construction of the new TS/MRF. Once capacity has been reached, all solid waste would be shipped to outlying landfills until the transfer station is completed. This would increase the number of trash trucks on the highways and the trip lengths required to dispose of solid waste, thus increasing regional air quality emissions. This impact would be greater than the Proposed Project. Under Alternative D, Phase II would be identical to the Proposed Project. Therefore, Phase II air quality impacts under Alternative D would be the same as those identified for the Proposed Project.

Noise

Under Alternative D, the landfill would be closed when it reaches its current maximum elevation of 1,010 feet msl. The remaining components of Phase I, construction, expansion, and installation activities, would remain the same as those identified under the Proposed Project. Noise would be generated by the trash trucks on the roadways and equipment on the landfill until such time as the landfill is closed. In addition, noise would be generated by the flares and the construction activities for the new TS/MRF. The noise impacts under Alternative D for Phase I are anticipated to be less than those under the Proposed Project. This is due to the decrease in the amount of solid waste that would be brought to the landfill for disposal and the shortened duration in which the landfilling activities would occur versus the Proposed Project. During Phase II, noise would be generated by the operation of the new TS/MRF and the activities required to close the landfill in accordance with applicable regulations. These noise impacts are anticipated to be the same as those identified under the Proposed Project.

Aesthetics/Views

Under Alternative D, the maximum height of the landfill would not be increased; however, the remaining components of the Proposed Project would stay the same. As the height of the existing landfill would not be increased, no blockage of views of the surrounding mountains would occur. Views would be similar to what is currently available (see the before photographs in Figures 6-1 through 6-8). Since no blockage of views would occur, there would be no significant visual impacts associated with this alternative. Impacts with respect to aesthetics (view blockages) under Alternative D would be less than under the Proposed Project.

Since the remaining aspects of the project would stay the same as the Proposed Project, the same sources of light and glare are anticipated. These include security and facility lighting, headlights from trucks, and

glare from trucks and other equipment. This would produce the same amount and type of impacts associated with light and glare as discussed under the Proposed Project. Therefore, light and glare impacts under Alternative D would be the same as those under the Proposed Project.

Geology and Soils

Under Alternative D, the maximum height of the existing landfill would not be increased. During the operation of the existing landfill, the same procedures that are currently used to control soil erosion and to ensure slope stability would continue to be practiced. The other activities associated with Phase I of the Proposed Project would still occur (e.g., green and wood waste expansion and construction of the TS/MRF). Phase II of Alternative D would be the same as described for the Proposed Project. The earth moving activities associated with the activities in Phase I and II would be conducted in accordance with the existing conditions placed on the landfill and the conditions of the grading permits as required by the Department of Building and Safety. Therefore, geology and soils impacts under Alternative D would be the same as those identified under the Proposed Project.

Hydrology

Under Alternative D, the height of the existing landfill would not be increased beyond its currently permitted height of 1,010 feet above msl. All other activities associated with the Proposed Project would remain the same. The same procedures for controlling stormwater runoff and protecting water quality that are currently used would continue to be used under Alternative D. In addition, any construction that requires earth moving activities would comply with all applicable State and federal regulations, including NPDES, and the conditions listed on the grading permit as required by the Department of Building and Safety. Therefore, impacts to hydrology and water quality under Alternative D would be similar to the Proposed Project.

Hazardous Materials

The same activities would occur under Alternative D as would occur under the Proposed Project, except the maximum height of the existing landfill would not be increased beyond its currently permitted height of 1,010 ft above msl. Under the Alternative D, the Bradley Landfill would continue to accept solid waste until its existing permit expires in April 2007 (or sooner if it reaches capacity), at which time it would close. The Bradley Landfill does not accept hazardous waste and has measures in place to ensure that hazardous wastes do not enter the landfill. These procedures would remain in place until the landfill is closed. Therefore, hazardous materials impacts associated with the continued operation of the landfill under the Alternative D would be the same as those identified for the operation of the existing landfill under Phase I of the Proposed Project.

No hazardous materials would be required for the construction of the new TS/MRF, or expansion of the green and wood waste facility. Operation of the new TS/MRF under Phase II would utilize the same procedures as the existing landfill to prevent hazardous materials from entering the TS and being sent to

other landfills. Therefore, hazardous materials impacts would be the same as those identified under the Proposed Project.

Utilities (Wastewater)

Under Alternative D, leachate generated by the decomposition of landfilled material would continue to be collected through the existing wastewater (leachate) collection and disposal system. This collected leachate would be discharged to the existing public sanitary sewer system under the conditions of the landfill's industrial wastewater discharge permit issued by the Regional Water Quality Control Board. Since the height of the existing landfill would not be increased, the amount of leachate generated is anticipated to be slightly less than under the Proposed Project. Therefore, leachate impacts under Alternative D would be less than those identified under the Proposed Project.

Operation of the new TS/MRF is not anticipated to generate any wastewater. A slight increase in the wastewater generated by employees is anticipated since more employees would be needed with operation of the new TS/MRF. Therefore, impacts from wastewater generation would be the same under Alternative D as under the Proposed Project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Unlike many projects, the environmental effects of solid waste disposal projects and alternatives must be considered within the context of the regional solid waste handling and disposal system. Regardless of whether the proposed project is built, solid waste continues to be generated in the City of Los Angeles and elsewhere in the region. Therefore, the effects of constructing the Proposed Project or one of the alternatives would vary depending on developments elsewhere in the regional system. As indicated in the analyses presented above, if solid waste generation is reduced through implementation of new technologies that reduce the need for landfills, the additional landfill capacity provided by the Proposed Project and Alternatives B and C would not be needed and these alternatives would merely prolong the impacts associated with the landfill operation at BLRC. Similarly, if adequate transfer capacity is available in the region, then the potential impacts associated with hauling waste to outlying landfills using an increased number of trucks that have less capacity than transfer trucks would not occur. However, in the short term, it is clear that reduction in the need for landfilling will not occur, as the shift to new technologies is only in the exploratory stage and will require many years at a minimum to implement. In addition, in the absence of reduction in the volume of waste requiring landfill disposal, coupled with a commitment on the part of the City of Los Angeles to discontinue disposal within the City limits, demand for transfer capacity will continue to rise for the foreseeable future. As such, consideration of the potential environmental superiority of the alternatives to the Proposed Project must be conducted under the assumption that the Proposed Project provides needed enhancement to the regional solid waste disposal system and that, in the absence of the Proposed Project, the effects noted above, particularly with respect to increased truck traffic to outlying landfills, would result. The discussion below is reflective of this context.

Alternative B, the 19 foot height increase, would be environmentally superior to the proposed Bradley Landfill and Recycling Center Transition Master Plan because it would avoid the significant and unavoidable impact related to aesthetics (view blockage) that would result from both the Proposed Project and Alternative C, Reduced Transfer Station. This alternative would increase the maximum height by 24 feet less than the Proposed Project, allowing views of the surrounding mountains from San Fernando Road to remain. This alternative also allows for continued operation of the landfill until such time that construction of the new TS/MRF can be completed. Alternative B would be environmentally superior to the No Project Alternative and Alternative D, No Height Expansion, if alternative methods of processing solid waste are not implemented or if adequate transfer capacity is not provided in the City or the region.

In the event, however, that adequate transfer capacity is available or the City implements advanced technologies that reduce the need for waste to be transported to landfills, the No Project Alternative would be environmentally superior to the Proposed Project and Alternative B, since none of the impacts of the additional landfill capacity or transfer station would be experienced in the Sun Valley community. Similarly, under this circumstance, Alternative C, Reduced Transfer Station, would be environmentally superior to the Proposed Project because of reduced traffic, air quality and noise impacts.