

DONALD L. WOLFE  
CHAIRMAN

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

April 3, 2006

Mr. Jimmy C. Liao  
Project Coordinator  
Room 750, City Hall  
Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012-4801

Dear Mr. Liao:

**BRADLEY LANDFILL AND RECYCLING CENTER TRANSITION MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT  
CASE NO. ENV-2001-3267-EIR**

On behalf of the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), I would like to thank the City of Los Angeles for the opportunity to provide comments on the December 2005 Draft Environmental Impact Report (DEIR) for the Bradley Landfill and Recycling Center (Bradley Landfill) Transition Master Plan.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and its 88 cities in Los Angeles County. These documents include the County's and cities' Source Reduction and Recycling Elements, Household Hazardous Waste Elements, Non-Disposal Facilities Elements, the Countywide Siting Element and the Countywide Integrated Waste Management Summary Plan. Consistent with these responsibilities and to ensure a coordinated and cost-effective solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a Countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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The Countywide Siting Element is a long-term planning document that has been approved by a majority of the 88 cities (including the City of Los Angeles) with a majority of the cities' population, the Board of Supervisors, and the California Integrated Waste Management Board in June 1998. The Countywide Siting Element requires all proposed landfill expansion projects to obtain a Finding of Conformance (FOC) from the Task Force. The FOC is a valuable mechanism to protect public health and safety and the environment since it provides a forum for public input, evaluates the project's impact on adjacent communities, ensures compliance with the Countywide Siting Element's siting criteria, and assesses a project's conformance with the local waste management plan.

The Task Force has reviewed the DEIR consistent with the above responsibilities and in conjunction with the requirements of Section 40000 et seq. of the California Public Resource Code and Section 18756.1, Title 14 of the California Code of Regulations. The DEIR proposes to "transition" Bradley Landfill from an active landfill to a transfer station/material recovery facility operation by seeking:

- A 43-foot vertical landfill expansion
- To reduce the permitted disposal rate from 10,000 to 7,000 tons per day
- To construct a new 4,000 tons per day transfer station
- To construct a new 1,000 tons per day material recovery facility
- To increase green waste/wood waste facility capacity from 1,260 to 2,500 tons per day
- To increase the existing material recovery facility capacity from 92 to 99 tons per day

The following comments are offered:

1. In 2004, Bradley Landfill underwent a 10-foot elevation expansion/regrade. As part of the approval process, the applicant, Waste Management, Inc., sought a FOC from this Task Force. On August 19, 2004, the Task Force denied the FOC request (copy enclosed) due to:
  - a. Conflicting documentation of the facility's land use permit
  - b. Applicant's failure to obtain an FOC prior to the approval of the facility's 1998 Solid Waste Facility Permit
  - c. Inadequacy of the facility's existing gas control system to protect adjacent residential homes and their occupants. Because landfill gas can potentially ignite and/or explode and some homes are located less than 200 feet away from Bradley Landfill, it was critical that the system be capable of preventing all landfill gas from migrating off the property boundary.

To date, the applicant has yet to address the above issues.

2. The DEIR fails to indicate that the proposed landfill expansion will require an FOC from the Task Force. The DEIR must describe how the proposed expansion will comply with the siting criteria specified in Chapter 6 of the Countywide Siting Element. The City of Los Angeles' land use permit should require the applicant to obtain an FOC from the Task Force as a condition of approval for the landfill expansion.
3. A number of landfill closures have occurred within the last few years in Los Angeles County and more closures are expected to occur in the near future. Thus, there is an urgent need for developing (a) alternatives to landfills, including conversion technologies, and (b) additional materials recovery facility capacity.
  - a. One of the Countywide Siting Element's primary goals is to develop and promote conversion technologies. Conversion technologies are biological, chemical and thermal processes capable of turning post-recycled residual solid waste into useful products, green fuels, and clean, renewable energy. In August 2005, in a letter to the North Valley Coalition, Mayor Antonio Villaraigosa expressed the City's commitment to develop a conversion technology facility by 2010. In addition, on February 17, 2006, the Los Angeles City Council adopted the RENEW LA document. Thus, to advance the City's efforts and in accordance with the Countywide Siting Element, we request the City to consider requiring the applicant to develop a conversion technology facility at the project location and/or provide funding for the promotion of conversion technologies.
  - b. One of the primary goals of the Countywide Integrated Waste Management Summary Plan – a long-term document that describes the steps that will be taken by local agencies, acting independently and in concert, to achieve the 50 percent waste diversion mandate – is to develop additional materials recovery capacity. Materials recovery facilities play an integral role in assisting jurisdictions to maximize their waste reduction activities. Thus, in accordance with the Countywide Integrated Waste Management Summary Plan, we request the City to consider requiring the applicant to increase the materials recovery capacity to total capacity ratio so that the majority of wastes received are processed through the materials recovery facility, ensuring fewer recyclables are disposed.

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4. The proposed transfer station and materials recovery facility, if approved by the City, must be incorporated into the City's Non-Disposal Facility Element. As part of the approval process, the City's revised Non-Disposal Facility Element must be submitted to the Task Force for review and concurrence.

We thank you for your consideration of this request and look forward to working with the City towards a mutual beneficial outcome. If you have any questions, please contact Mr. Carlos Ruiz, staff to the Task Force, at (626) 458-3502, Monday through Thursday 7 a.m. to 5:30 p.m.

Sincerely,

*Margaret Clark*

Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force, and  
Councilmember, City of Rosemead

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Enc.

cc: Mayor Antonio Villaraigosa  
City of Los Angeles Department of City Planning (S. Gail Goldberg, Director)  
City of Los Angeles Office of Zoning Administration (Daniel Green)  
Each Member of the Los Angeles County Integrated Waste Management Task  
Force



DONALD L. WOLFE  
CHAIRMAN

LOS ANGELES COUNTY  
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October 6, 2004

The Honorable James Hahn  
Mayor City of Los Angeles  
200 North Main Street  
Los Angeles, CA 90012-4801

Dear Mayor Hahn:

#### **BRADLEY LANDFILL AND RECYCLING CENTER EXPANSION**

At its meeting of August 19, 2004, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force took action regarding Waste Management, Inc.'s request for a Finding of Conformance for the expansion/regrade of the Bradley Landfill and Recycling Center. The Task Force denied the request because the project is in conflict with the goals, policies, and objectives of the Los Angeles County Countywide Siting Element dated June 1997. The conflicts are specifically in relation to:

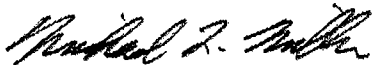
- conflicting documentation of the facility's land use permit
- applicant's failure to obtain a Finding of Conformance prior to the approval of the facility's 1998 Solid Waste Facility Permit
- inadequacy of the facility's existing gas control system to protect the public health and safety of the buildings adjacent to the facility and their occupants

Enclosed is a copy of the letter dated September 9, 2004, transmitting the Task Force's action.

The Honorable James Hahn  
October 6, 2004  
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Should you have any questions, please contact Mr. Martin Aiyetiwa at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m., or Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Very truly yours,



Michael Miller, Vice-chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Mayor, City of West Covina

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cc: City of Los Angeles Department of Building & Safety (Nick Delli-Quadri)  
City of Los Angeles Fire Department (William R. Bamattre)  
Each Member of the Los Angeles County Integrated Waste Management Task Force



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

September 9, 2004

IN REPLY PLEASE  
REFER TO FILE: EP-2

Mr. Doug Corcoran  
Director of Operations  
Bradley Landfill and Recycling Center  
Waste Management Disposal Services  
9081 Tujunga Avenue, Second Floor  
Sun Valley, CA 91352-1516

Dear Mr. Corcoran:

### **REQUEST FOR FINDING OF CONFORMANCE BRADLEY LANDFILL AND RECYCLING CENTER EXPANSION**

On August 19, 2004, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) considered your request for a Finding of Conformance for the expansion/regrade of the Bradley Landfill and Recycling Center. The Task Force reviewed the application materials submitted for conformance with the Los Angeles County Countywide Integrated Waste Management Plan in accordance with the requirements of Chapter 10 of the Los Angeles County Countywide Siting Element dated June 1997. The Siting Element requires that new and expansion of existing solid waste disposal facilities be consistent with the Siting Element and its Siting Criteria.

The Task Force denied the FOC application by 7 votes out of the 11 members in attendance with 2 votes in opposition of the denial and 2 votes in abstention. It is the opinion of the Task Force that the expansion/regrade project is in conflict with the policies, goals, and objectives of the Siting Element, specifically in relation to:

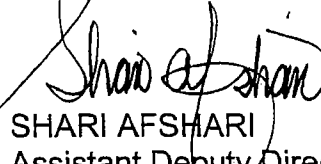
- conflicting documentation of the facility's land use permit
- applicant's failure to obtain a Finding of Conformance prior to the approval of the facility's 1998 Solid Waste Facility Permit
- inadequacy of the facility's existing gas control system to protect the public health and safety of the building adjacent to the facility and their occupants

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Please note that the denial of this application does not preclude Waste Management, Inc., from reapplying in the future. Should you have any questions, please contact Mr. Martins Aiyetiwa at (626) 458-3553, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

DONALD L. WOLFE, Interim Director of Public Works/Chairman  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force



SHARI AFSHARI  
Assistant Deputy Director  
Environmental Programs Division

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cc: City of Los Angeles Office of Zoning Administration (Robert Janovici, Daniel Green)  
City of Los Angeles Environmental Affairs Department (Wayne Tsuda)  
California Integrated Waste Management Board (Linda Moulton-Patterson,  
Scott Walker)  
Each Member of the Los Angeles County Integrated Waste Management Task Force