

SECTION 7.0
CUMULATIVE IMPACTS

7.0 CUMULATIVE IMPACTS

7.1 DEFINITION OF CUMULATIVE IMPACTS

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) discuss cumulative impacts of a project when the project's incremental effect is potentially cumulatively considerable. As defined by the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR. To facilitate the discussion of potentially cumulative impacts that could result from implementation of the proposed project, each impact category evaluated in Section 6.0 (Resource Specific Analysis) of the Draft EIR (DEIR) is addressed individually in this cumulative impacts analysis.

A simple comparison of the cumulative environment contrasted with the increment of impact on its face is not an adequate rationale for concluding that a project does not have a cumulative effect. This is known as the ratio theory approach. Neither is the one molecule rule of change or addition an appropriate standard, where any increment, no matter how small, would be considered cumulatively significant. The most current interpretation of the standard is whether "any additional amount of effect should be considered significant in the context of the existing cumulative effect" (*Communities For A Better Environment V. California Resources Agency*, 126 California Reporter, 2d. 441, Cal.App.3 Dist., 2002). The same case states further:

“[T]his does not mean, however, that *any* additional effect in a nonattainment area for that effect *necessarily* creates a significant cumulative impact; the "one [additional] molecule rule" is not the law. ...[t]he lead agency shall consider whether the cumulative impact is significant and whether the proposed project's incremental effects are cumulatively considerable.”

The objective of cumulative impact analysis is to look at trends with regard to each environmental parameter and ensure that past, present and future projects in an area are aggregated to examine impacts in a big picture contextual approach. In the context of the proposed Scholl Canyon Landfill (SCLF) Expansion (proposed project), there are conditions that must be considered in the local and, depending on the parameter, regional contexts of the project.

The cumulative impacts analysis provided here is consistent with the process contemplated by Section 15130(a) of the CEQA Guidelines in which the analysis of cumulative effects in an EIR is based on two determinations: Is the combined impact of this project and other projects significant? Is the project's incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? The cumulative impact must be analyzed only if the combined impact is significant and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130(a)(2) and (3)). When an EIR determines that a cumulative impact is not significant, or that the project's incremental effect is not cumulatively considerable, the EIR should briefly describe the basis for that determination (CEQA Guidelines 15130(a)(2) and (3)).

7.2 CUMULATIVE PROJECTS IN THE SCHOLL CANYON LANDFILL STUDY AREA

An adequate discussion of significant cumulative impacts requires either: "...a list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency..." or "...a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which

described or evaluated regional or area wide conditions contributing to the cumulative impact.” For this cumulative analysis, nearby jurisdictions were contacted about approved and pending projects. The complete list of projects shared by the planning staffs for the cities of Glendale, Los Angeles, and Pasadena is presented in Table 7-1. The City of Los Angeles provided six projects; however, these projects would have a negligible contribution to cumulative impacts. All of the projects within the City of Glendale are at least three miles from SCLF. The two projects identified by the City of Pasadena were of sufficient size and scope to contribute to cumulative impacts. The nearest is one mile from the site but much further by driving.

TABLE 7-1. PLANNED AND PROPOSED LAND USES IN THE VICINITY OF SCLF

Case Number or Name / Address	Jurisdiction	Description
AA-2006-10526-PMLA 1259 W. Kipling Ave.	City of Los Angeles	Preliminary parcel map to create two R1-1 Zone lots.
AA-2006-9494-PMLA 1923 N. Upperton Pl.	City of Los Angeles	A zoning administrator interpretation to clarify the uses permitted in an existing office complex located in the MR2 Zones.
AA-2007-133-PMEX 921 N. Crestwood Ter.	City of Los Angeles	Parcel map exemption to adjust the lot line between 921 N. Crestwood Terrace and 5850 Buena Vista Terrace.
AA-2007-90-PMEX 1552 W. Wildwood Dr.	City of Los Angeles	A conditional use to permit the sale of a full line of alcoholic beverages for on site consumption in conjunction with an adult cabaret in the M2-2D Zone.
APCE-2007-321-SPE-SPP-ZAA 1351 W. Colorado Blvd.	City of Los Angeles	A Specific Plan exemption from the Colorado Blvd. Specific Plan for relief from the hours of operation; a project permit compliance with the Colorado Specific Plan; and a zoning administrator’s adjustment for reduced setbacks.
DIR-2007-168-SPP 1936, 1948, 1950, 1952, 1954, 1956, and 1958 W. Colorado Blvd.	City of Los Angeles	Business identification wall signs; conformance review and sign-off to construct rear patio cover; and approval of plans for sale of beer and wine for on site consumption
ICIS Project 524 W. Colorado St. and 544 W. Elk Ave.	City of Glendale	200 multi-family dwelling units and 8,300 square feet of commercial.
Nordstrom at Americana 889 Americana Way	City of Glendale	119,119 square feet of commercial.
Verdugo Gardens III 610 N. Central Avenue	City of Glendale	235 multi-family dwelling units.
Legendary Tower 300 N. Central Avenue	City of Glendale	72 multi-family dwelling units; 8 live/work dwelling units; and 1,240 square feet of commercial.
301 N. Central Avenue	City of Glendale	84 multi-family dwelling units and 3,000 square feet of commercial.
Brand + Wilson 124 W. Wilson	City of Glendale	235 multi-family dwelling units and 9,800 square feet of commercial.
The Lex on Orange 320-324 N. Central Ave.; 208 W. Lexington Dr.; and 317-345 N. Orange St.	City of Glendale	307 multi-family dwelling units and 3 live/work dwelling units
Orange + Wilson 200 W. Wilson	City of Glendale	166 multi-family dwelling units; 5 live/work dwelling units; and 2,649 square feet of restaurant.
Jackson & Colorado 228 S. Jackson	City of Glendale	28 multi-family dwelling units and 11,470 square feet of office.

TABLE 7-1. PLANNED AND PROPOSED LAND USES IN THE VICINITY OF SCLF

Case Number or Name / Address	Jurisdiction	Description
1110 S. Central Avenue	City of Glendale	4,500 square feet of office.
Mita Plaza 435 Los Feliz Blvd.	City of Glendale	25,000 square feet of day spa; 36,000 square feet of market; 26,880 square feet of commercial; 11,210 square feet of restaurant; 32,000 square feet of office; and 32,000 square feet of medical office.
Veterans Village of Glendale 327 Salem St.	City of Glendale	44 multi-family dwelling units.
370 Salem St.	City of Glendale	17 multi-family dwelling units.
624 Geneva St.	City of Glendale	5 multi-family dwelling units.
224 S. Jackson St.	City of Glendale	17 multi-family dwelling units; 11,373 square feet of commercial; and 11,330 square feet of office.
347 Milford St.	City of Glendale	12 multi-family dwelling units.
604-610 W. Broadway	City of Glendale	12,802 square feet of office and 1,620 square feet of commercial
352 W. Chevy Chase Dr.	City of Glendale	7 multi-family dwelling units.
611 E. Acacia Ave.	City of Glendale	12 multi-family dwelling units.
400 W. Stocker St.	City of Glendale	7 multi-family dwelling units.
Louise Gardens 111 N. Louise St	City of Glendale	63 multi-family dwelling units.
118 S. Kenwood St.	City of Glendale	35 multi-family dwelling units.
128-132 S. Kenwood St.	City of Glendale	28 multi-family dwelling units.
Laemmlle Cinema Lofts 111 E. Wilson Ave. and 215 N. Maryland Ave.	City of Glendale	42 multi-family dwelling units and 9,690 square feet of movie theater.
Glendale Triangle Project 3600 San Fernando Rd.	City of Glendale	265 multi-family (market rate) dwelling units; 22 multi-family (affordable) dwelling units; and 37,000 square feet of commercial.
Hyatt Place Glendale 225 Wilson Ave.	City of Glendale	172 hotel rooms and 1,950 square feet of restaurant.
Maryland Avenue Park 810 S. Maryland Ave.	City of Glendale	21,250 square feet of public mini-park.
Broadway Lofts 200 E. Broadway	City of Glendale	248 multi-family dwelling units and 26,642 square feet of restaurant.
525 W. Elk Ave.	City of Glendale	71 multi-family dwelling units.
463 Salem St.	City of Glendale	10 multi-family dwelling units.
3013 Montrose Ave.	City of Glendale	9,500 square feet of church.
Mercendes-Benz Dealership 622 S. Brand Blvd.	City of Glendale	41,000 square feet of car dealership.
Subaru Dealership 1304-1310 S. Brand Blvd.	City of Glendale	3,360 square feet of addition to car dealership.

TABLE 7-1. PLANNED AND PROPOSED LAND USES IN THE VICINITY OF SCLF

Case Number or Name / Address	Jurisdiction	Description
Star Dealership 1101 S. Brand Blvd	City of Glendale	47,977 square feet of car dealership.
124 W. Colorado St.	City of Glendale	50 multi-family dwelling units.
200 S. Louise St.	City of Glendale	3,240 square feet of commercial addition.
900 W. Glenoaks Blvd.	City of Glendale	8,947 square feet of commercial shopping center.
432 Myrtle St.	City of Glendale	4 multi-family dwelling units.
632 N. Louise St.	City of Glendale	2 multi-family dwelling units.
Colorado at Lake Mixed Use and Hotel Development 880 E. Colorado Blvd.	City of Pasadena	Application for a conditional use permit and other entitlements for a two-phased, mixed-use project with hotel, office, retail, restaurant, and residential uses.
Rose Bowl Stadium Renovation Project 1001 Rose Bowl Dr.	City of Pasadena	Renovations of the existing Rose Bowl stadium are proposed to allow use by the UCLA Bruins football team, Rose Bowl Game, Bowl Championship Series games, and soccer matches, as well as to bring the building systems up to current Code requirements.

Source: *City of Los Angeles Planning Department, East Los Angeles Planning Area; City of Glendale Planning Department, and City of Pasadena, Planning Division.*

7.3 CUMULATIVE ENVIRONMENTAL IMPACTS

The mitigation measures provided in Section 6.0 (Resource Specific Analysis) of the DEIR have been developed to minimize or avoid significant impacts. In so doing, these measures also reduce the potential for significant cumulative effects. In this section, the proposed project's contribution towards a cumulative impact is based on the impact remaining after mitigation is considered.

7.3.1 AESTHETICS

7.3.1.1 Variation 1

The SCLF is located within the San Rafael Hills, a generally east/west trending topographic feature, that are parallel to, and southwest of, the San Gabriel Mountains. The majority of the land within one mile of the SCLF is zoned for residential use, with limited areas designated for open space, special recreation (parks, golf course, etc.), and commercial development. From most developed residential, park, and commercial locations south, southeast, and southwest of the landfill, views of the landfill are blocked by buildings, landscape trees, and/or intervening topography of the San Rafael Hills. However, the SCLF can be seen from the following locations where topography, vegetation, or structures do not obstruct views: areas in the Scholl Canyon Park and Scholl Canyon Golf and Tennis Complex; community parks, existing residential and commercial land uses in the City of Glendale; residential and commercial land uses in the City of Los Angeles; and residential land uses in the City of Pasadena.

As discussed in Section 6.1 (Aesthetics) of the DEIR, a number of key views were selected to generate visual simulations to represent how Variation 1 would appear after project implementation. It was determined that impacts related to the visual character of the area would not substantially change or be substantially degraded. In addition, Variation 1 was determined to be in compliance with the City of Glendale's ridgeline preservation ordinance, as it would not develop or physically alter any of the naturally occurring canyons and ridges of the San Rafael Hills. The projects listed in Table 7-1 would not result in major impacts to existing visual resources since they are infill projects within an already urbanized portion of Los Angeles County and are located within areas of lower elevation than the SCLF and therefore, would not be visually

prominent. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to aesthetics.

7.3.1.2 Variation 2

Variation 2 has the same aesthetic setting as Variation 1, described in Section 7.3.1.1.

As discussed in Section 6.1 (Aesthetics) of the DEIR, a number of key views were selected to generate visual simulations to represent how Variation 2 would appear after project implementation. It was determined that impacts related to the visual character of the area would not substantially change or be substantially degraded. In addition, Variation 2 was determined to be in compliance with the City of Glendale's ridgeline preservation ordinance, as it would not develop or physically alter any of the naturally occurring canyons and ridges of the San Rafael Hills. The projects listed in Table 7-1 would not result in major impacts to existing visual resources since they are infill projects within an already urbanized portion of Los Angeles County and are located within areas of lower elevation than the SCLF and therefore, would not be visually prominent. Therefore, implementation of Variation 2 would not result in a cumulative adverse impact related to aesthetics.

7.3.2 AIR QUALITY

7.3.2.1 Variation 1

As described in Section 6.2 (Air Quality) of the DEIR, because Variation 1 does not include any lateral expansion, there will be no "new" construction activities associated with continued operation of the landfill. Construction of Variation 1 would not violate or contribute substantially to an existing or projected air quality violation, nor would it result in a cumulatively considerable incremental increase of any criteria pollutant for which the region is in non-attainment. Also, construction of Variation 1 would not expose sensitive receptors to substantial pollutant concentrations, nor would it create objectionable odors affecting a substantial number of people.

Operation of Variation 1 would not create objectionable odors affecting a substantial number of people. However, operation of Variation 1 would result in the generation of criteria pollutants that would exceed the South Coast Air Quality Management District's (SCAQMD) mass daily thresholds and localized significant thresholds for NO_x, PM₁₀, and PM_{2.5}. Additionally, because Variation 1 would result in PM₁₀ emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM₁₀, as set forth in the Air Quality Management Plan (AQMP). Even with implementation of mitigation measures AQ-1 through AQ-16, which represent all feasible mitigation measures, emissions of NO_x, PM₁₀ and PM_{2.5} generated during operation of Variation 1 would not be reduced to below a level of significance. Operation of Variation 1 would result in significant and unavoidable, adverse air quality impacts after mitigation.

In accordance with SCAQMD methodology, any project that produces a significant air quality impact in an area that is not in attainment would also result in cumulative impacts that are considered potentially significant. Therefore, operation of Variation 1 coupled with some of the projects identified in Table 7-1 has the potential to contribute to cumulative adverse impacts related to air quality.

7.3.2.2 Variation 2

As described in Section 6.2 (Air Quality) of the DEIR, "new" construction activities associated with Variation 2 would include the lateral expansion including installation of the clay liner, a geomembrane,

geotextile, and drainage layer comprised of sand and gravel, as well as excavation of the hill located in the northern portion of the property. Peak daily construction emissions associated with these activities would exceed the SCAQMD's mass daily threshold and localized significance threshold for NO_x emissions. Even with implementation of mitigation measures AQ-1 through AQ-16, which represent all feasible mitigation measures, emissions of NO_x generated during Variation 2 construction would not be reduced to below a level of significance. Construction of Variation 2 would result in significant and unavoidable adverse air quality impacts after mitigation.

Neither construction nor operation of Variation 2 would create objectionable odors affecting a substantial number of people. However, operation of Variation 2 would result in the generation of criteria pollutants that would exceed the SCAQMD's mass daily thresholds and localized significance thresholds for NO_x, PM₁₀, and PM_{2.5}. Additionally, because Variation 2 would result in PM₁₀ emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM₁₀, as set forth in the AQMP. Even with implementation of mitigation measures AQ-1 through AQ-16, which represent all feasible mitigation measures, emissions of NO_x, PM₁₀ and PM_{2.5} generated during operation of Variation 2 would not be reduced to below a level of significance. Operation of Variation 2 would result in unavoidable adverse significant air quality impacts after mitigation.

In accordance with SCAQMD methodology, any project that produces a significant air quality impact in an area that is not in attainment would also result in cumulative impacts that are considered potentially significant. Therefore, construction and operation of Variation 2 coupled with some of the projects identified in Table 7-1 has the potential to contribute to cumulative adverse impacts related to air quality.

7.3.3 BIOLOGICAL RESOURCES

7.3.3.1 Variation 1

As discussed in Section 6.3 (Biological Resources), implementation of Variation 1 would result in no disturbance of previously undisturbed vegetation. Because Variation 1 would not impact previously undisturbed areas, no adverse impacts related to special-status plants/vegetation communities, special-status wildlife species, other wildlife species, wildlife movement corridors, or conflicts with tree protection ordinances are expected to occur.

Impacts to disturbed biological resources would occur as a result of construction and ongoing operations. Indirect impacts would occur as a result of erosion, siltation, and drainage runoff; invasion by non-native plants; and noise, motion, startle and fugitive dust. However, relative to baseline conditions of disturbance, Variation 1 would result in no new impacts.

The cumulative projects listed in Table 7-1 are considered infill projects within a highly urbanized area and are not expected to result in any significant biological resources impacts. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to biological resources.

7.3.3.2 Variation 2

As discussed in Section 6.3 (Biological Resources), implementation of Variation 2 would result in the loss of 6.7 acres of previously undisturbed chaparral vegetation during excavation of the hillside north of the proposed horizontal expansion. Direct impacts to disturbed biological resources and 6.7 acres of previously undisturbed chaparral habitat would occur as a result of the construction and operation of Variation 2. Indirect impacts would occur as a result of potential erosion and siltation and invasion by non-native,

invasive plant species. Relative to baseline conditions of disturbance, Variation 2 would result in a less than significant increase in such impacts due to impacts in the newly disturbed 6.7 acres. No impacts related to special-status plants/vegetation communities, special-status wildlife species, other wildlife species, wildlife movement corridors, or conflicts with tree protection ordinances are expected to occur.

The 6.7-acre area of new disturbance has the potential to provide suitable nesting habitat for some bird species protected by the Migratory Bird Treaty Act. Loss of chaparral within this area would constitute a loss of potential nesting habitat and could disrupt nesting activities if work was completed during the breeding season. The removal of this potential habitat without any protective steps for birds could result in bird mortality (or nest failure) which is a potentially significant, adverse impact.

Mitigation measures provided as part of the proposed project would reduce all potential impacts to a level that is less than significant. Additionally, the cumulative projects listed in Table 7-1, which are considered infill projects within a highly urbanized area, are not expected to result in any significant biological resources impacts. Therefore, implementation of Variation 2 would not result in a cumulative adverse impact related to biological resources.

7.3.4 CULTURAL RESOURCES

7.3.4.1 Variation 1

As discussed in Section 6.4 (Cultural Resources) of the DEIR, because Variation 1 would not disturb any native/intact soils there is no potential to impact archaeological resources or to uncover human remains. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to cultural resources.

7.3.4.2 Variation 2

As discussed in Section 6.4 (Cultural Resources) of the DEIR, approximately 9 acres of native hill would be cut to accommodate the horizontal landfill expansion associated with Variation 2. This work would occur on the north side of the project site which, as indicated in the field survey performed for the proposed project, has no visible traces to indicate the presence of any cultural resources. The majority of the surrounding area has been previously disturbed by landfill and City of Glendale Fire Department activities. As such, the potential to encounter cultural resources or human remains under Variation 2 is low. However, precautionary mitigation measures were added to ensure that any previously unknown resources on the site would be protected should they be discovered during grading ground disturbing activities. Given the low likelihood of resources being on site and the fact that other projects in the area are typically subject to similar protective mitigation for cultural and paleontological resources, implementation of Variation 2 would not result in a cumulative adverse impact related to cultural resources.

7.3.5 GEOLOGY AND SOILS

7.3.5.1 Variation 1

Geotechnical impacts are site-specific. Through City and County development review processes, planned and proposed future development projects would be evaluated for potential geotechnical impacts. Where needed, mitigation measures would be required to minimize or avoid potential geotechnical impacts. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to geology and soils.

7.3.5.2 Variation 2

For the same reasons as noted for Variation 1, implementation of Variation 2 would not result in a cumulative adverse impact related to geology and soils.

7.3.6 GREENHOUSE GAS EMISSIONS

7.3.6.1 Variation 1

Because greenhouse gases (GHGs) concerns are global, any project that emits GHGs has the potential to contribute to an incremental, cumulatively considerable impact. As such, the GHG emissions analysis for Variation 1 already considers cumulative effects. As described in Section 6.6 (Greenhouse Gas Emissions) of the DEIR, because Variation 1 does not include any lateral expansion, there will be no “new” construction activities associated with continued operation of the landfill and no associated construction-related GHG emissions. As also described in Section 6.6 (Greenhouse Gas Emissions) of the DEIR, operation of Variation 1 would not result in direct GHG emissions in excess of the SCAQMD’s interim GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr). Because the SCAQMD’s limit is based on regional significance, a project below this limit is inherently less than significant on a regional basis. Furthermore, Variation 1 would result in continued operation of the SCLF, which provides a renewable energy source for electricity generation. In addition to providing a benefit related to global GHG emissions, this is consistent with the Climate Change Scoping Plan (CCSP) Recommended Action 4 to provide renewable energy sources as an alternative to fossil fuel combustion. Consequently, implementation of Variation 1 would not result in a cumulative adverse impact related to GHGs.

7.3.6.2 Variation 2

Because GHGs concerns are global, any project that emits GHGs has the potential to contribute to an incremental, cumulatively considerable impact. As such, the GHG emissions analysis for Variation 2 already considers cumulative effects. As described in Section 6.6 (Greenhouse Gas Emissions) of the DEIR, “new” construction activities associated with Variation 2 would include the installation of a 13-acre composite liner, as well as excavation of the hill located in the northern portion of the property. Project-related GHG emissions are evaluated based on operational emissions and amortized construction emissions. Variation 2 would not result in direct GHG emissions in excess of the SCAQMD’s interim GHG threshold of 10,000 MTCO₂e/yr. Because the SCAQMD’s limit is based on regional significance, a project below this limit is inherently less than significant on a regional basis. Furthermore, Variation 2 would result in continued operation of the SCLF, which provides a renewable energy source for electricity generation. In addition to providing a benefit related to global GHG emissions, this is consistent with the Climate Change Scoping Plan (CCSP) Recommended Action 4 to provide renewable energy sources as an alternative to fossil fuel combustion. Consequently, implementation of Variation 2 would not result in a cumulative adverse impact related to GHGs.

7.3.7 HAZARDS AND HAZARDOUS MATERIALS

7.3.7.1 Variation 1

Only municipal solid waste (MSW) is accepted at the SCLF. Hazardous materials such as asbestos, batteries, chemicals, paints, non-autoclaved medical waste, and other substances considered hazardous are not accepted. The landfill operates under existing regulations related to hazardous materials and follows standard procedures in the event of hazards which could affect the site such as fire or earthquake. These

practices would continue under Variation 1 with the extension of landfill operations for an estimated additional 13 years. Additionally, there are no nearby uses which, when considered with the landfill operations, increase any hazard risks on site or to areas surrounding the landfill property. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to hazards and hazardous materials.

7.3.7.2 Variation 2

For the same reasons as noted for Variation 1, Variation 2 would not result in a cumulative adverse impact related to hazards and hazardous materials.

7.3.8 SURFACE WATER HYDROLOGY

7.3.8.1 Variation 1

As discussed in Section 6.8 (Surface Water Hydrology) of the DEIR, the Sanitation Districts would continue to design, construct, and operate adequate stormwater run-off control measures to minimize erosion and prevent flooding of downstream users from the 100-year, 24-hour storm. The final cover of the proposed project would be designed in accordance with applicable stormwater drainage regulations and approved by the RWQCB, CalRecycle, and the Local Enforcement Agency (Los Angeles County Department of Public Health). In addition to the continued rapid diversion of water into lined channels and pipes, vegetated final cover would reduce flow velocity, as well as bind the soil to prevent erosion. Furthermore, all existing structures would have sufficient capacity to accommodate the flow associated with the proposed fill under Variation 1. Impacts related to altering the existing drainage pattern of the site, creating or contributing to run-off, and construction or expansion of stormwater drainage facilities would be considered less than significant. Note that Variation 1 would have a beneficial impact to water quality and peak flow compared to existing conditions due to greater flow attenuation and desiltation.

As such, implementation of Variation 1 would not result in a cumulative adverse impact related to altering the existing drainage pattern of the site or construction or expansion of stormwater drainage facilities and a beneficial cumulative impact related to greater flow attenuation and desiltation would result.

7.3.8.2 Variation 2

As discussed in Section 6.8 (Surface Water Hydrology) of the DEIR, the Sanitation Districts would continue to design, construct, and operate adequate stormwater run-off control measures to minimize erosion and prevent flooding of downstream users from the 100-year, 24-hour storm. The final cover of the proposed project would be designed in accordance with applicable stormwater drainage regulations and approved by the RWQCB, CalRecycle, and the Local Enforcement Agency (Los Angeles County Department of Public Health). In addition to the continued rapid diversion of water into lined channels and pipes, vegetated final cover would reduce flow velocity, as well as bind the soil to prevent erosion. Furthermore, all existing structures would have sufficient capacity to accommodate the flow associated with the proposed fill under Variation 2. Impacts related to altering the existing drainage pattern of the site, creating or contributing to run-off, and construction or expansion of stormwater drainage facilities would be considered less than significant. Note that Variation 2 would have a beneficial impact to water quality and peak flow compared to existing conditions due to greater flow attenuation and desiltation.

As such, implementation of Variation 2 would not result in a cumulative adverse impact related to altering the existing drainage pattern of the site or construction or expansion of stormwater drainage facilities and a beneficial cumulative impact related to greater flow attenuation and desiltation would result.

7.3.9 WATER QUALITY

7.3.9.1 Variation 1

Section 6.9 (Water Quality) of the DEIR identified the potential for surface and ground water quality impacts during construction and operation of Variation 1. However, with the continuation of existing practices and compliance with all applicable best management practices (BMPs) listed in the Stormwater Pollution Prevention Plan (SWPPP), the on site Spill Prevention Control and Countermeasure (SPCC) Plan, and compliance with the existing National Pollutant Discharge Elimination System (NPDES) permit, Soil Acceptance Program (SAP), and runoff monitoring program, construction- and operation-related impacts to surface water quality would be considered less than significant.

Like Variation 1, cumulative projects in the region would be developed in compliance with existing regulations and plans regulating water quality, including NPDES Permits. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to water quality.

7.3.9.2 Variation 2

Section 6.9 (Water Quality) of the DEIR identified the potential for surface and ground water quality impacts during construction and operation of Variation 2. However, with the continuation of existing practices and compliance with all applicable BMPs listed in the SWPPP, the on site SPCC Plan, and compliance with the existing NPDES permit, SAP, and runoff monitoring program, construction- and operation-related impacts to surface water quality would be considered less than significant.

Like Variation 2, cumulative projects in the region would be developed in compliance with existing regulations and plans regulating water quality, including NPDES Permits. Therefore, implementation of Variation 2 would not result in a cumulative adverse impact related to water quality.

7.3.10 NOISE

7.3.10.1 Variation 1

Cumulative noise impacts related to construction activities have the potential to occur due to development of cumulative projects with coinciding schedules or in close proximity to the project site. Short-term construction activities associated with Variation 1 would comply with the City of Glendale/Pasadena, and City of Los Angeles allowable hours of operations. Therefore, compliance with the City Noise Ordinances would reduce project noise impacts related to construction to a level that is less than significant. Similarly, all other cumulative projects are required to comply with the noise ordinance of the jurisdiction where the cumulative project is located. Therefore, construction of Variation 1 would not result in a cumulative adverse impact related to noise.

As discussed in Section 6.10 (Noise) of the DEIR, noise impacts from landfill construction and operations would be considered less than significant and no significant groundborne vibration impacts are projected under Variation 1. In addition, the Sanitation Districts will ensure that all landfill operating equipment and trucks are properly tuned and have noise muffling equipment that meets or exceeds applicable EPA standards. However, there is the potential for residences located along Scholl Canyon Road to be impacted by landfill operation-related traffic noise. It was determined that a potentially significant noise impact related to landfill traffic could occur under Variation 1 if landfill tonnage reaches 2,600 tons per day (TPD). The traffic along adjacent roadways is forecast with existing and planned projects considered. Consequently, cumulative traffic noise impacts are already incorporated into the analysis. A mitigation measure has been

proposed that will ensure that potentially significant adverse impacts regarding traffic-related noise are reduced to below a level significance. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to noise.

7.3.10.2 Variation 2

Cumulative noise impacts related to construction activities have the potential to occur due to development of cumulative projects with coinciding schedules or in close proximity to the project site. Short-term construction activities associated with Variation 2 would comply with the City of Glendale/Pasadena, and City of Los Angeles allowable hours of operations. Therefore, compliance with the City Noise Ordinances would reduce project noise impacts related to construction to a level that is less than significant. Similarly, all other cumulative projects are required to comply with the noise ordinance of the jurisdiction where the cumulative project is located. Therefore, construction of Variation 2 would not result in a cumulative adverse impact related to noise.

As discussed in Section 6.10 (Noise) of the DEIR, noise impacts from landfill construction and operations would be considered less than significant and no significant groundborne vibration impacts are projected under Variation 2. In addition, the Sanitation Districts will ensure that all landfill operating equipment and trucks are properly tuned and have noise muffling equipment that meets or exceeds applicable EPA standards. However, there is the potential for residences located along Scholl Canyon Road to be impacted by landfill operation-related traffic noise. It was determined that a potentially significant noise impact related to landfill traffic could occur under Variation 2 if landfill tonnage reaches 2,600 TPD. The traffic along adjacent roadways is forecast with existing and planned projects considered. Consequently, cumulative traffic noise impacts are already incorporated into the analysis. A mitigation measure has been proposed that will ensure that potentially significant adverse impacts regarding traffic-related noise are reduced to below a level significance. Therefore, implementation of Variation 2 would not result in a cumulative adverse impact related to noise.

7.3.11 TRANSPORTATION AND TRAFFIC

7.3.11.1 Variation 1

The traffic analysis for Variation 1 already considers cumulative growth through the use of a regional ambient growth traffic model. As stated in Section 6.11 (Transportation and Traffic) of the DEIR, based on discussions with staff from the City of Glendale, City of Pasadena, and City of Los Angeles, the cities collectively did not have any cumulative projects near SCLF that would add a substantial amount of traffic to the project area. As such, the cumulative projects in Table 7-1 were deemed to add only nominal traffic to the project area due to a lack of proximity or due to land use type and no addition of traffic beyond ambient growth was warranted.

As discussed in Section 6.11 (Transportation and Traffic) of the DEIR, it was concluded in the traffic analysis that significant impacts would occur at the intersections of Figueroa Street at SR-134 westbound ramps and Figueroa Street at SR-134 eastbound ramps in both the interim (2020) and horizon (2034) years. However, with implementation of recommended mitigation measures the significant impacts identified at these intersections would be reduced to below a level of significance. Therefore, implementation of Variation 1 would not result in a cumulative adverse impact related to transportation and traffic.

7.3.11.2 Variation 2

The traffic analysis for Variation 2 already considers cumulative growth through the use of a regional ambient growth traffic model. As stated in Section 6.11 (Transportation and Traffic), based on discussions with staff from the City of Glendale, City of Pasadena, and City of Los Angeles, the cities collectively did not have any cumulative projects near SCLF that would add a substantial amount of traffic to the project area. As such, the cumulative projects in Table 7-1 were deemed to add only nominal traffic to the project area due to a lack of proximity or due to land use type and no addition of traffic beyond ambient growth was warranted.

As discussed in Section 6.11 (Transportation and Traffic), it was concluded in the traffic analysis that significant impacts would occur at the intersections of Figueroa Street at SR-134 westbound ramps and Figueroa Street at SR-134 eastbound ramps in both the interim (2020) and horizon (2040) years. However, with implementation of recommended mitigation measures the significant impacts identified at these intersections would be reduced to below a level of significance. Therefore, implementation of Variation 2 would not result in a cumulative adverse impact related to transportation and traffic.