

IV. Environmental Impact Analysis

M. Utility and Service Systems

3. Solid Waste

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on solid waste facilities. The analysis describes existing solid waste facilities and their associated capacities, estimates the amount of solid waste that would be generated during construction and operation of the Project, and evaluates whether existing and planned solid waste facilities could accommodate the estimated solid waste generated by the Project. An assessment of the Project's consistency with applicable solid waste regulations and its potential to impair solid waste reduction goals is also included. This analysis is based in part on the County of Los Angeles Countywide Integrated Waste Management Plan (ColWMP) 2019 Annual Report prepared by the County of Los Angeles Department of Public Works in September 2020. For a discussion of the regulatory requirements regarding the use, storage, and disposal of hazardous wastes, refer to **Section IV.E., Hazards and Hazardous Materials**, of this Draft EIR

2. Environmental Setting

a) Regulatory Framework

The following describes the primary regulatory requirements regarding solid waste disposal. These plans, guidelines, and laws include:

- Assembly Bill 939 (California Integrated Waste Management Act of 1989)
- Assembly Bill 1327 (California Solid Waste Reuse and the Recycling Access Act of 1991)
- Senate Bill 1374 (Construction and Demolition Waste Materials Diversion Requirements)
- Assembly Bill 1826 (Solid Waste: Organic Waste)
- Zero Waste California
- California Green Building Standards
- Assembly Bill 341 (California's 75-Percent "Recycling" Goal, the County of Los Angeles Countywide Integrated Waste Management Plan 2017)
- City of Los Angeles General Plan Framework Element
- City of Los Angeles Solid Waste Integrated Resources Plan (Zero Waste Plan)
- RENEW LA Plan
- City of Los Angeles Space Allocation Ordinance
- Citywide Construction and Demolition Debris Recycling Ordinance

- The City-wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System
- The City of Los Angeles Green Building Ordinance

(1) State

(a) *Assembly Bill 939: Integrated Waste Management Act of 1989*

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), as amended, was enacted to reduce, recycle, and reuse solid waste generated in the State. AB 939 requires city and county jurisdictions to divert 50 percent of the total waste stream from landfill disposal. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element to describe how it would reach these goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of AB 939, including the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the California Department of Resources Recycling and Recovery (CalRecycle) to update their progress toward the AB 939 goals.¹ CalRecycle is a department within the California Environmental Protection Agency (CalEPA) that administers and provides oversight for all of California's State-managed non-hazardous waste handling and recycling programs.

(b) *Assembly Bill 1327*

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in Public Resources Code (PRC) Sections 42900-42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas is to be determined by the appropriate jurisdiction's ordinance. Pursuant to AB 1327, the City of Los Angeles adopted the Space Allocation Ordinance (Ordinance No. 171,687), discussed below.

(c) *Senate Bill 1374*

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (Senate Bill [SB] 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for

¹ California Public Resources Code Section 41821.

diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004.²

(d) Assembly Bill 1826

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines “organic waste” as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a “business” as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week also were required to arrange for organic waste recycling services. In September 2020, CalRecycle reduced this threshold to 2 cubic yards of solid waste (i.e., total of trash, recycling, and organics) per week generated by covered businesses.³

(e) Zero Waste California

Zero Waste California is a state program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

(f) California Green Building Standards

The 2019 California Green Building Standards Code, referred to as the CALGreen Code,⁴ sets standards for new structures to minimize the state’s carbon output. California requires that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Each local jurisdiction retains the administrative authority to exceed the new CALGreen standards. The 2019 CALGreen Code went into effect January 1, 2020.

² CalRecycle, Senate Bill 1374 (2002), August 24, 2018.

³ CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed August 22, 2022.

⁴ Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes. Accessed August 22, 2022.

(g) Assembly Bill 341

AB 341, signed on February 10, 2011, directed that no less than 75 percent of solid waste generated in California be source reduced⁵, recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 also mandated local jurisdictions to implement commercial recycling by July 1, 2012.

(2) Regional*(a) County Integrated Waste Management Plan*

Pursuant to AB 939, each County is required to prepare and administer a CoIWMP, including preparation of an Annual Report. The CoIWMP is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated State diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the CSE.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2019 Annual Report, published in September 2020, provides disposal analysis and facility capacities for 2019, as well as projections to the CoIWMP's horizon year of 2034.⁶ As stated within the CoIWMP 2019 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.⁷ A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2034.⁸

⁵ Source reduction refers to activities designed to reduce the volume, mass, or toxicity of products throughout their life cycle. It includes the design and manufacture, use, and disposal of products with minimum toxic content, minimum volume of material, and/or a longer useful life.

⁶ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, 2020.

⁷ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, 2020, page 50.

⁸ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, 2020, page 50 and 51.

(3) Local

(a) *City of Los Angeles General Plan Framework*

The City’s General Plan Framework Element (Framework Element), adopted in August 2001, includes general guidance regarding land use issues that include direction on infrastructure and public services. The Framework Element includes an Infrastructure and Public Services Chapter, which responds to federal and state mandates to plan for adequate infrastructure in the future. The Framework Element supports AB 939 and its goals by encouraging “an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal.”⁹ The Framework Element addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program and composting). Furthermore, the Framework Element states that for these programs to succeed, the City should locate businesses where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The Framework Element indicates that more transfer facilities will be needed to dispose of waste at remote landfill facilities due to the continuing need for solid waste transfer and disposal facilities, as well as the limited disposal capacity of the landfills in Los Angeles. Several landfill disposal facilities accessible by truck and waste-by-rail landfill disposal facilities that could be used by the City are identified to meet its disposal need.¹⁰

(b) *City of Los Angeles Solid Waste Integrated Resources Plan*

LA Sanitation and Environment (LASAN) developed the Solid Waste Integrated Resources Plan (SWIRP) also known as the “Zero Waste Plan,” a 20-year master plan to reduce solid waste, increase recycling, and manage trash in the City through the year 2030.¹¹ This plan encompasses on-going solutions and programs (i.e., blue and green bin recycling, multi-family recycling, restaurant food scrap diversion, alternative technologies, hazardous waste recycling, Los Angeles Unified School District recycling program, etc.) as well as new programs to be implemented during the planning horizon. In addition, the SWIRP is the result of a mayoral directive that is in line with the City Council’s RENEW LA plan, as discussed further below.¹² In May 2008, the stakeholders of the Zero Waste Plan adopted the Solid Waste Integrated Resources Plan guiding principles to help the City achieve its zero waste goals by 2030.¹³ The Solid Waste Integrated Resources Plan is intended to provide a long-term outline of the policies, programs, infrastructure, regulations, incentives, new green jobs,¹⁴ technology, and financial

⁹ City of Los Angeles Department of City Planning, Citywide General Plan Framework, August 2001, p. 9-11.

¹⁰ City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, 2001.

¹¹ LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan, 2013.

¹² LASanitation, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.

¹³ City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City’s Solid Waste Policies and Programs, 2009.

¹⁴ “Green jobs” is the term for work force opportunities created by companies and organizations whose mission is to improve environmental quality.

strategies necessary to achieve 90-percent diversion of solid waste by 2025.¹⁵ The term “zero waste” refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycled/reused materials. As noted by the City, “zero waste” is a goal and not a categorical imperative; the City is seeking to come as close to “zero waste” as possible. Based on the 2013 Zero Waste Progress Report and using the calculation methodology adopted by the State of California, the City achieved a landfill diversion rate of approximately 76 percent in 2012, exceeding Mayor Villaraigosa’s goal.¹⁶

(c) *RENEW LA Plan*

RENEW LA was adopted by the City Council in March 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery.¹⁷ This shift is predicted to result in “zero waste” and an overall diversion level of 90 percent by 2025.¹⁸ The plan focuses on combining key elements of existing reduction and recycling programs and infrastructure with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, and renewable fuels, chemicals, and energy. The RENEW LA Plan also calls for reductions in the quantity of residual materials disposed in landfills and their associated environmental impacts.

(d) *City of Los Angeles Space Allocation Ordinance*

Pursuant to the California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327), the City enacted the Space Allocation Ordinance (Ordinance No. 171,687) on August 13, 1997, which is incorporated in various sections of the Los Angeles Municipal Code (LAMC). The Space Allocation Ordinance requires the provision of an adequate recycling area or room for collecting and loading recyclable materials in all new construction projects, all existing multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and all other existing development projects where the addition of floor area is 30 percent or more.

(e) *Citywide Construction and Demolition Debris Recycling Ordinance*

On March 5, 2010, the City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) that requires LASAN to ensure that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor. The policy became effective

¹⁵ LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan (SWIRP), <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp>. Accessed August 22, 2022.

¹⁶ LASanitation, Recycling, <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r>. Accessed August 22, 2022.

¹⁷ Los Angeles Municipal Code, City Ordinance 184665, http://clkrep.lacity.org/onlinedocs/2016/16-1235-s1_ORD_184665_12-14-16.pdf, Accessed August 22, 2022.

¹⁸ Los Angeles Municipal Code, City Ordinance 184665, http://clkrep.lacity.org/onlinedocs/2016/16-1235-s1_ORD_184665_12-14-16.pdf, Accessed August 22, 2022.

in January 2011.¹⁹ These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.²⁰ Additionally, compliance with the Ordinance and the LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including C&D waste, would be recycled.

(f) *City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System*

Solid waste collection, management, and disposal in the City are handled both by LASAN crews and by various permitted private solid waste haulers. The City provides solid waste collection, recycling, and green waste collection services primarily to single-family uses and multi-family uses with four units or less. Private solid waste haulers collect from most multi-family residential uses with four or more units and commercial uses based on an open permit system. Permitted waste haulers must obtain an annual permit, submit an annual report, and pay quarterly fees. However, unlike LASAN, private waste haulers are not required to provide recycling services, operate clean fuel vehicles, offer similar costs for similar services, or reduce vehicle miles traveled. Thus, the existing open permit system limits the ability of the City to address compliance with State environmental mandates and the City's waste diversion goals. Although the City has obtained a 76-percent solid waste diversion rate as identified in the 2013 Zero Waste Progress Report,²¹ nearly three million tons of solid waste from the City are still disposed in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.²²

To respond to these challenges, and in response to City Council directive, LASAN established Zero Waste LA, a new public-private partnership designed to address the three million tons of waste disposed annually by businesses, consumers, and residents.²³ This innovative franchise system establishes a waste and recycling collection program for all commercial, industrial, and large multifamily customers in the City of Los Angeles. In April 2014, the Mayor and City Council approved the ordinance that allows the City to establish an exclusive franchise system with 11 zones. With a single trash hauler responsible for each zone, the franchise system will allow for the efficient collection and sustainable management of solid waste resources and recyclables.

¹⁹ LASanitation, Construction and Demolition Recycling, <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr>. Accessed August 22, 2022.

²⁰ City of Los Angeles Bureau of Sanitation, Waste Hauler Permit Program, <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-whp>. Accessed August 22, 2022.

²¹ City of Los Angeles Bureau of Sanitation, Zero Waste Progress Report, https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf. Accessed August 22, 2022.

²² City of Los Angeles, Final Implementation Plan for Exclusive Commercial and Multifamily Franchise Hauling System, April 2013.

²³ LASanitation, Construction and Demolition Recycling, <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr>. Accessed August 22, 2022.

Among other requirements, the City will mandate maximum annual disposal levels and specific diversion requirements for each franchise zone to promote solid waste diversion from landfills in an effort to meet the City’s zero waste goals. This program began in July 2017.

(g) Los Angeles Green Building Ordinance

On December 17, 2013, the Los Angeles City Council approved Ordinance No. 182,849, which amended Chapter IX, Article 9 of the LAMC to reflect local administrative changes and incorporate by reference portions of the CALGreen Code. The amended Article 9 is referred to as the “Los Angeles Green Building Code.” Projects must comply with the Los Angeles Green Building Code as amended to comply with various provisions of the CALGreen Code. The Los Angeles Green Building Code creates a set of development standards and guidelines to further energy efficiency and reduction of greenhouse gases. It builds upon and sets higher standards than those incorporated in CALGreen, and is implemented through the building permit process.

b) Existing Conditions

(1) Solid Waste Collection and Disposal

Within the City, solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. Refuse from single-family residential and limited multi-family residential uses on public streets is collected by the Bureau of Sanitation & Environment and disposed of at City operated landfills. The Bureau of Sanitation & Environment provides collection services primarily to single-family residences and some of the smaller multi-family residences, collecting over one million tons of refuse annually from 750,000 customers including single- and small multi-family residences, averaging 6,652 tons per day.²⁴ The City is also responsible for collecting waste from the City Hall complex, some public buildings, parks, and fire stations. Large multi-family residences, such as apartment complexes and condominiums, and commercial and industrial buildings, will be serviced through the Zero Waste LA Franchise System.²⁵

(2) Landfills

Waste disposal sites (i.e., landfills) are operated by the County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill’s jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region).

²⁴ Los Angeles Bureau of Sanitation, Solid Resources website, available at: <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s>. Accessed August 22, 2022.

²⁵ City of Los Angeles, Ordinance No. 182,986, May 28, 2014.

In 2019, the most recent year for which reported data is available, the County disposed of approximately 10.5 million tons of materials.²⁶ There are 10 Class III landfills in the County, which collectively accept the majority of solid waste generated in the County (approximately 5,227,982 tons).²⁷ Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of Class III solid waste. Sunshine Canyon accepts residential, commercial, and construction waste. Solid waste from the Project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers.

(a) *Sunshine Canyon Landfill*

As of December 31, 2019, the Sunshine Canyon Landfill had a remaining capacity of approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.²⁸ The landfill has a permitted maximum daily intake of 12,100 tpd and the 2019 disposal rate was approximately 6,919 tpd.

Additional landfills within the County that may be used include the following:

- Antelope Valley Landfill, with a remaining disposal capacity of 10.97 million tons,
- Burbank Landfill, with a remaining disposal capacity of 2.66 million tons,
- Calabasas Landfill, with a remaining capacity of 4.32 million tons,
- Chiquita Canyon Landfill, with a remaining capacity of 56.99 million tons,
- Lancaster Landfill, with a remaining disposal capacity of 9.95 million tons,
- Pebbly Beach Landfill, with a remaining disposal capacity of 50,000 tons,
- San Clemente Island Landfill, with a remaining disposal capacity of 19,000 tons,
- Scholl Canyon Landfill, with a remaining capacity of 3.83 million tons, and
- Savage Canyon (Whittier) Landfill, with a remaining disposal capacity of 4.45 million tons.²⁹

As discussed in the CoIWMP 2019 Annual Report, the County would meet the disposal capacity requirements of AB 939 by using available or planned out-of-County disposal capacity and developing the necessary infrastructure to facilitate exportation of waste to out-of-County landfills. Landfills outside of the County that may be used include the following:

²⁶ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Figure 1, Disposal Trend, page 5.

²⁷ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 26.

²⁸ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

²⁹ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

- Olinda Alpha Sanitary Landfill in Orange County;
- Frank R. Bowerman Sanitary Landfill in Orange County;
- H.M. Holloway Landfill in Kern County;
- Prime Deshecha Sanitary Landfill in Orange County;
- Simi Valley Landfill & Recycling Center in Ventura County;
- El Sobrante Landfill in Riverside County;
- San Timoteo Sanitary Landfill in San Bernardino County;
- Mid-Valley Sanitary Landfill in San Bernardino County; and
- Mesquite Regional Landfill in Imperial County.³⁰

(b) *Unclassified Landfills*

Unclassified landfills accept construction and demolition waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2019, the amount of inert waste materials disposed Countywide was 266,452 tons.³¹

As of 2019, there is only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit, which is the Azusa Land Reclamation Landfill.³² The remaining capacity of this landfill is estimated at 47.07 million cubic yards (58.84 million tons) with a projected capacity exhaustion in 221 years; however, the landfill has a permit closure date in 26 years.³³

(3) Recycling Facilities

As previously discussed, waste generated in the City may also be diverted from landfills and recycled. The Bureau of Sanitation & Environment's Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and reuse programs in the City.³⁴ The Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (HHW), and helps create markets for recycled materials.³⁵ In order to help meet the diversion goals of AB 939 and the City, the City adopted the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January

³⁰ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 25. Appendix E-2, Table 6.

³¹ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 25.

³² County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

³³ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

³⁴ Los Angeles Bureau of Sanitation & Environment, Construction and Demolition Recycling Website, Available at: <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr>. Accessed August 22, 2022.

³⁵ Los Angeles Bureau of Sanitation & Environment, Construction and Demolition Recycling Website, available at: <https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr>. Accessed August 22, 2022.

1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation & Environment prior to collecting, hauling, and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible.

(4) Existing Solid Waste Generation

The Project Site is currently developed with two single-story vacant warehouses that occupy 31,600 square feet of floor area, two covered shelters, and an at grade concrete parking lot totaling 22,409 square feet. As the existing uses are currently vacant there is no on-site generation of solid waste.

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Project would have a significant impact related to solid waste if it would:

Threshold (a): *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals; or*

Threshold (b): *Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate solid waste impacts:

(1) Solid Waste

- *Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;*
- *Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and*
- *Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.*

The potential for the Project to result in impacts to solid waste is based on the *State CEQA Guidelines* Appendix G thresholds and criteria identified in the *L.A. CEQA Thresholds Guide* that provide supplemental analysis to the Appendix G thresholds, where applicable. The City's

threshold criteria above are considerations that were made as part of the analysis of the Appendix G thresholds for water supply and infrastructure.

b) Methodology

The environmental impacts of the Project with respect to solid waste are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the Project's solid waste generation and future landfill capacities, including a discussion of recycling programs and design features that would be implemented with the Project. Projected solid waste generation and future landfill capacities are provided in the SWIRP, which is a 20-year master plan to reduce waste, increase recycling, and manage trash in the City. Solid waste generation estimates are based on generation rates provided by the *City of Los Angeles LA CEQA Thresholds Guide*.³⁶

c) Project Design Features

No specific Project Design Features have been identified with regard to solid waste generation.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and an decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold (a): Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?

Numerical differences exist for this threshold because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

³⁶ City of Los Angeles LA CEQA Thresholds Guide, 2006, page M.3-2.

(1) Impact Analysis

(a) Project

(i) Construction

Implementation of the Project would generate construction and demolition waste. Construction and demolition debris include concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of the 31,600 square feet of warehouses and 22,409 square foot surface parking lot that would be disposed of as inert waste. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill.

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 502 tons of solid waste³⁷ over the entire construction period from 2022 to 2025, and approximately 4,672 tons of demolition debris.³⁸ As required by City Ordinance 181,519 (Waste Hauler Permit Program), Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The inert solid waste and soil would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of state-permitted Inert Debris Engineered Fill Operations in the County, such as the Arcadia Reclamation Facility. This does not include any asbestos-containing materials (ACMs), lead-based paints (LBPs), polychlorinated biphenyl (PCB), contaminated soil, or other contaminated waste which would be disposed of at facilities licensed to accept such waste (see **Section IV.E, Hazards and Hazardous Materials**, of this Draft EIR, for further discussion). In compliance with the requirements of SB 1374 and City Ordinance No. 181,519, the Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling.

Moreover, the ColWMP concludes that there is current capacity of 58.84 million tons available in the County for the disposal of inert waste.³⁹ Therefore, the Project-generated demolition debris of 4,672 tons and construction waste of 502 tons (i.e., asphalt and construction debris) would represent approximately 0.009 percent of the inert waste disposal capacity in the region. **Thus,**

³⁷ A construction waste generation rate of 4.02 pounds per square foot was used. 249,758 square feet of construction multiplied by 4.02 pounds is 1,004,027 pounds (502.01 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

³⁸ A demolition waste generation rate of 173.00 pounds per square foot was used. 55,009 square feet of demolition multiplied by 173.00 pounds is 9,343,557 pounds (4,671.8 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998.

³⁹ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, page 33.

construction of the Project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals and, therefore, impacts would be less than significant.

(ii) *Operation*

The Project would generate solid waste that is typical of a residential mixed-use development and be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in **Table IV.M.3-1, Project Estimated Daily Solid Waste Generation**, the Project would generate approximately 4,239 ppd of solid waste.

**Table IV.M.3-1
Project Estimated Daily Solid Waste Generation**

Land Use	Size (square feet)	Generation Rate ^a (pounds/employee/day)	Employees	Total Generation (pounds/day)
Apartment: 1 Bedroom	191 du	12.23/du	0	2,336
Apartment: 3 Bedroom	29 du	12.23/du	0	355
Commercial and Art Production Space	46,548 sf	10.53	126 ^b	1,327
Office Space ^d	4,350 sf	10.53	21 ^c	221
<i>Total Project Solid Waste Generation</i>				4,239
Existing Solid Waste Generation				0
Total Net Solid Waste Generation				4,239
<p>^a Generation rates are from the City of Los Angeles LA CEQA Thresholds Guide, 2006, page M.3-2 (commercial rate used).</p> <p>^b 0.00271 employees per average square foot (commercial category) \times 46,548 square feet = 126 employees. Source: Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.</p> <p>^c 0.00479 employees per average square foot (office category) \times 4,350 square feet = 21 employees. Source: Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018.</p> <p>^d In order to provide the most conservative estimate of employment generation for the Project, consistent with the traffic study assumptions, 3,900 square feet of the live/work units was designated as office space and included in the employment calculations.</p> <p>Source (table): EcoTierra Consulting, 2020.</p>				

All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the waste generated by the Project would be diverted at a 50 percent rate as required by AB 939, thereby diverting this waste from landfills. Nonetheless, it is conservatively assumed that all 4,239 ppd (2.1 tons) of the Project's solid waste would be disposed of at regional landfills. As discussed previously, the permitted daily intake of the Sunshine Canyon Landfill is 12,100 tons, while the average daily intake of is approximately 6,919 tons (for a typical daily remaining intake capacity of 5,181 tons). The Project's 2.1 tons of solid waste would represent 0.02 percent of the permitted daily intake and 0.04 percent of the typical daily remaining intake capacity. As such, the landfill would be able to accommodate the net daily operational waste generated by the Project. Furthermore, according

to the 2019 CoIWMP, the Sunshine Canyon Landfill had approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.⁴⁰

As described in the CoIWMP, future disposal needs over the next 15-year planning horizon (2033) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. The Project Site is located in an urban area with established solid waste collection routes (i.e., private haulers under contract to LA Sanitation). Transport of the Project's solid waste would occur along one of the established routes. Thus, the Project would not result in the need for additional solid waste collection routes. The Project would not require the expansion or construction of a new solid waste disposal or recycling facility to handle Project-generated waste because the existing facilities have enough capacity to receive the Project's waste.

Based on the above, the Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project, and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs.

Thus, operation of the Project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Therefore, impacts associated with operational solid waste would be less than significant.

(b) Flexibility Option

Under the Flexibility Option, the commercial square footage provided would be increased to 64,313 square feet within the same building parameters and, in turn, there would be a reduction in the overall number of live/work units for a total of 200 units. Overall, the design, configuration, and operation of the Flexibility Option would be comparable to the Project.

(i) Construction

Similar to the Project, implementation of the Flexibility Option would generate construction and demolition waste from the demolition of the 31,600 square feet of warehouses and 22,409 square foot surface parking lot. In accordance with the requirements of SB 1374 and City Ordinance No.

⁴⁰ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

181,519, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill.

As the design, configuration, and operation of the Flexibility Option would be comparable to the Project, it is also estimated to generate a total of approximately 502 tons of solid waste⁴¹ over the entire construction period, and approximately 4,672 tons of demolition debris.⁴² This would represent a very small percentage of the inert waste disposal capacity in the region; which at Sunshine Canyon Landfill alone has the permitted capacity to accept 12,100 tons per day. **Thus, construction of the Flexibility Option would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals and, therefore, impacts would be less than significant.**

(ii) Operation

Similar to the Project, the Flexibility Option would generate solid waste that is typical of a residential mixed-use development and be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in **Table IV.M.3-2, Flexibility Option Estimated Daily Solid Waste Generation**, the Flexibility Option would generate approximately 4,478 ppd of solid waste.

Similar to the Project, it is estimated that the waste generated by the Flexibility Option would be diverted at a 50 percent rate as required by AB 939, thereby diverting this waste from landfills. Nonetheless, it is conservatively assumed that all 4,478 ppd (2.2 tons) of the Flexibility Option's solid waste would be disposed of at regional landfills. As discussed previously, the permitted daily intake of the Sunshine Canyon Landfill is 12,100 tons, while the average daily intake of is approximately 6,919 tons (for a typical daily remaining intake capacity of 5,181 tons). The Flexibility Option's 2.2 tons of solid waste would represent 0.02 percent of the permitted daily intake and 0.04 percent of the typical daily remaining intake capacity. As such, the landfill would be able to accommodate the net daily operational waste generated by the Flexibility Option. Furthermore, according to the 2019 CoIWMP, the Sunshine Canyon Landfill had approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.⁴³ **Thus, operation of the Flexibility Option would not generate waste in excess of**

⁴¹ A construction waste generation rate of 4.02 pounds per square foot was used. 249,758 square feet of construction multiplied by 4.02 pounds is 1,004,027 pounds (502.01 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

⁴² A demolition waste generation rate of 173.00 pounds per square foot was used. 55,009 square feet of demolition multiplied by 173.00 pounds is 9,343,557 pounds (4,671.8 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998.

⁴³ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals and, therefore, impacts would be less than significant.

**Table IV.M.3-2
Flexibility Option Estimated Daily Solid Waste Generation**

Land Use	Size (square feet)	Generation Rate ^a (pounds/employee/day)	Employees	Total Generation (pounds/day)
Apartment: 1 Bedroom	173 du	12.23/du	0	2,116
Apartment: 3 Bedroom	27 du	12.23/du	0	330
Commercial and Art Production Space	64,313 sf	10.53	174 ^b	1,832
Office Space ^d	4,050 sf	10.53	19 ^c	200
<i>Total Flexibility Option Solid Waste Generation</i>				4,478
Existing Solid Waste Generation				0
Total Solid Waste Generation				4,478
^a Generation rates are from the City of Los Angeles LA CEQA Thresholds Guide, 2006, page M.3-2 (commercial rate used). ^b 0.00271 employees per average square foot (commercial category). Source: Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018. ^c 0.00479 employees per average square foot (commercial category). Source: Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018. ^d In order to provide the most conservative estimate of employment generation for the Project, consistent with the traffic study assumptions, 3,900 square feet of the live/work units was designated as office space and included in the employment calculations. Source (table): EcoTierra Consulting, 2020.				

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to solid waste capacity, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to solid waste capacity, would be less than significant without mitigation.

Threshold (b): Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the consistency of the Project or the Flexibility Option to applicable state, regional and City plans, programs, ordinances, or policies related to solid waste would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

(a) State

(i) *Consistency with California Integrated Waste Management Act of 1989*

As discussed previously, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's total solid waste generated (2,120 ppd) must be recycled rather than disposed of in a landfill. The Project would comply with AB 939 requirements and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would comply with the Bureau of Sanitation & Environment Solid Resources Infrastructure Facility Plan to reduce the amount of solid waste being disposed into landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Since the Project would not substantially increase solid waste generation in the City or the amount disposed into the landfills, the Project would comply with AB 939.

(ii) *Consistency with Senate Bill 1374-Construction and Demolition Waste Materials Diversion Requirements*

As discussed previously, SB 1374 requires jurisdictions to divert 50 percent to 75 percent of all construction and demolition waste from landfills. In compliance with the requirements of SB 1374 and City Ordinance No. 181,519, the Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling and the Project would comply with SB 1374.

(iii) *Consistency with California Organics Recycling (Assembly Bill 1826)*

AB 1826 requires mandatory recycling of organic waste generated by certain commercial uses such as restaurants and grocery stores. The Project, which would be comprised of uses that will generate eight cubic yards or more of organic waste and four cubic yards or more of organic waste per week will separate food scraps and yard trimmings and arrange for recycling services for that waste in a specified manner. Furthermore, the Project would be comprised of businesses that generate four cubic yards or more of commercial solid waste per week and will arrange for organic waste recycling services. As the Project would implement recycling services, the Project would comply with AB 1826.

(iv) *Consistency with Assembly Bill 341 – Amendments to the California Integrated Waste Management Act of 1989*

AB 341 amends AB 939 by mandating that jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020 and requires multi-family residential developments with five units or more to provide for recycling services on site. In accordance with the requirements of SB 1374 and City Ordinance No. 181,519, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills and the Project includes a trash and recycling room on level 1, and trash and recycling rooms on each floor; the Project would comply with these and all regulations related to construction and operational solid waste.

(v) *Consistency with CALGreen Building Code*

New development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the 2019 CALGreen Building Code. As previously discussed, all operating solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the Project would divert 50 percent of its solid waste generated as required by AB 939, thereby diverting this waste from landfills. The Project would therefore implement the CALGreen Building Code diversion requirements.

(b) *Regional*

(i) *Consistency with Countywide Integrated Waste Management*

As discussed previously, pursuant to AB 939, each County is required to prepare and administer a CoIWMP, including preparation of an Annual Report. As stated within the CoIWMP 2019 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.⁴⁴ The Project would comply with AB 939 requirements, as outlined in the CoIWMP, and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would therefore implement the CoIWMP.

⁴⁴ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, page 6.

*(c) Local**(i) Consistency with City of Los Angeles Solid Waste Programs and Ordinances*

The City implements various programs and ordinances related to solid waste. As previously described, these include: (1) the City of Los Angeles Solid Waste Management Policy Plan; (2) the RENEW LA Plan; (3) the Waste Hauler Permit Program (Ordinance No. 181,519); and (4) the Exclusive Franchise System Ordinance (Ordinance No. 182,986). The Project construction waste, as required by City Ordinance 181,519, would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. Furthermore, all solid waste-generating related to the Project would be subject to the requirements set forth in AB 939 and further implemented through programs such as RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030.

(ii) Consistency with City of Los Angeles General Plan Framework Element

The Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The Project would include enclosed trash areas and recycling storage areas and divert 50 percent of the construction waste debris away from landfills. The Project would be consistent with the Framework Element goal of maximizing source reduction and materials recovery, and minimizing the amount of waste requiring disposal through the accommodation of sufficient solid waste and designated green waste bins. Furthermore, in accordance with the requirements of SB 1374 and City Ordinance No. 181,519, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills.

(iii) Consistency with the Los Angeles Municipal Code

The LAMC requires a project to be designed to incorporate a recycling area or room.⁴⁵ The Project would be required by LAMC to have sufficient containers to accommodate the amount of solid waste and recycling generated by the premises. Landscape waste would be placed in designated green waste bins. In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, Project construction and operation would achieve at least a 65 percent and 50 percent solid waste diversion rate, respectively, until year 2020, and at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. Thus, the Project would promote source reduction and recycling, consistent with AB 939 and the City’s Solid Waste Integrated Resources Plan, Framework Element, and Los Angeles Municipal Code.

⁴⁵ Los Angeles Municipal Code, Section 12.21 A.19.c.

(iv) *Consistency with Solid Waste Integrated Resources Plan*

SWIRP, or Zero Waste Plan, was established by the City as a master plan to reduce solid waste, increase recycling, and manage trash in the City through the year 2030. The SWIRP has a series of policies, programs, and facilities required to reach the City's goals of 70 percent diversion by 2013 and 90 percent diversion by 2025 in the City of Los Angeles.⁴⁶ The Project would be consistent with the SWIRP goal of minimizing the amount of waste requiring disposal through the accommodation of sufficient solid waste and designated green waste bins. Furthermore, in accordance with the requirements of SB 1374 and City Ordinance No. 181,519, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills.

(v) *Consistency with City of Los Angeles Green Building Code*

As stated previously, in December 2016, the Los Angeles City Council approved various provisions of the CALGreen Code as part of Ordinance No. 184,691, thus codifying certain provisions of the 2016 CALGreen Code as the new LA Green Building Code. Mandatory measures regarding solid waste include a 50 percent diversion of construction waste to landfills. In accordance with the requirements of SB 1374 and City Ordinance No. 181,519, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill.

(vi) *Consistency with City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (Ordinance No. 182,986)*

The City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, also known as the Zero Waste LA Franchise System, creates an efficient collection and sustainable management of solid waste resources and recyclables in the City. As previously discussed, solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. The Project Site is located in an urban area with established solid waste collection routes (i.e., private haulers under contract to LA Sanitation).

Therefore, the Project and the Flexibility Option would comply with applicable federal, state, and local statutes and regulations governing solid waste, and impacts would be less than significant.

⁴⁶ City of Los Angeles, Ordinance No. 184,665, December 9, 2016.

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to consistency with applicable federal, state, and local statutes and regulations governing solid waste, would be less than significant; no mitigation measures would be required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to consistency with applicable federal, state, and local statutes and regulations governing solid waste, would be less than significant without mitigation.

4. Cumulative Impacts

a) Impact Analysis

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

The solid waste cumulative impacts study area is the County of Los Angeles because the landfills open to the City of Los Angeles serve the entire County. County planning for future landfill capacity addresses cumulative demand over 15-year planning increments. The CoWMP 2019 Annual Report anticipates a 9.3 percent increase in population growth within the County of Los Angeles between 2019 and 2034 and an increase of 13.6 percent in employment.⁴⁷ The Project, in combination with the cumulative projects and other reasonably foreseeable growth within the City, would increase solid waste generation during construction and operation.

(1) Construction

The construction of the Project is estimated to generate a total of approximately 502 tons of solid waste⁴⁸ over the entire construction period, and approximately 4,672 tons of demolition debris.⁴⁹ Similar to the Project, the Related Projects and other reasonably foreseeable growth within the City would generate inert construction and demolition waste. Also similar to the Project, the

⁴⁷ County of Los Angeles, Department of Public Works, CoWMP 2019 Annual Report, September 2020, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

⁴⁸ A construction waste generation rate of 4.02 pounds per square foot was used. 249,758 square feet of construction multiplied by 4.02 pounds is 1,004,027 pounds (502.01 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

⁴⁹ A demolition waste generation rate of 173.00 pounds per square foot was used. 55,009 square feet of demolition multiplied by 173.00 pounds is 9,343,557 pounds (4,671.8 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998.

Related Projects and reasonably foreseeable growth would be subject to Citywide Construction and Demolition Waste Recycling Ordinance, and the construction and demolition waste would be recycled to the extent feasible. As indicated above, the remaining disposal capacity for Azusa Land Reclamation Landfill is 47.07 million cubic yards (58.84 million tons) with a permit closure date in 26 years.⁵⁰ Given this future capacity, it is expected that all construction and debris waste can be accommodated for during that time, and cumulative impacts regarding the disposal of construction and debris waste would not occur. Moreover, the CoIWMP 2019 Annual Report concludes that there is adequate capacity within permitted solid waste facilities (i.e., landfills) to serve the County through the 15-year planning period of 2019 through 2034.⁵¹ **Therefore, the Project and Flexibility Option’s contribution to cumulative impacts associated with waste in excess of state or local standards, in excess of the capacity of the local infrastructure, or the attainment of solid waste reduction goals during operation would not be cumulatively considerable and cumulative construction-related impacts with respect to solid waste would be less than significant.**

(2) Operation

Whereas in the past, solid waste disposal occurred solely within landfills located in the County, the trend in recent years is increased solid waste disposal at landfills located outside of the County. The use of out-of-County landfills will increase in the future given the difficulties associated with permitting new or expanded landfill facilities within the County. As such, the appropriate context within which to view the Project’s potential solid waste impacts is total disposal capacity available at landfills located within, as well as outside of, the County. In addition, in order to satisfy the disposal capacity requirements of AB 939, the County is developing facilities utilizing conversion technologies (defined as a wide array of biological, chemical, thermal [excluding incineration] and mechanical technologies capable of converting post-recycled residual solid waste into useful products and chemicals, green fuels, such as hydrogen, natural gas, ethanol and biodiesel, and clean, renewable energy such as electricity).⁵²

The City SWMPP, inclusive of its annual reports, serves as the primary planning documents for the County’s waste disposal needs, which include solid waste generated throughout the City. The CoIWMP forecasts conditions over a 15-year planning horizon. With each subsequent annual report, the 15-year planning horizon is extended by one year, thereby providing sufficient time to address any future shortfalls in landfill capacity. The CoIWMP 2019 Annual Report concludes that there is enough capacity within permitted solid waste facilities (i.e., landfills) to serve the County through the 15-year planning period of 2019 through 2034 through a combination of all or some of the following:

⁵⁰ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

⁵¹ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 6.

⁵² County of Los Angeles, Conversion Technology Evaluation Report, Phase II, October 2007, page ES-1.

- Increase waste reduction and diversion efforts;
- Continue to encourage the development of alternative technologies;
- Support exportation of waste to out-of-County facilities;
- Utilize Waste-by-Rail system to Mesquite Regional Landfill; and
- Expand in-County Class III landfill capacity.⁵³

The County will continually address landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. **Therefore, the Project and Flexibility Option's contribution to cumulative impacts associated with waste in excess of state or local standards, in excess of the capacity of the local infrastructure, or the attainment of solid waste reduction goals during operation would not be cumulatively considerable and cumulative impacts with respect to solid waste during operation would be less than significant.**

Similar to the Project, it is also anticipated that Related Projects and other reasonably foreseeable growth would be subject to environmental review on a case-by-case basis to ensure that they would not conflict with AB 939 waste diversion goals or the solid waste policies and objectives in the CoIWMP, CSE, as well as the City's SRRE and its updates, the CiSWMPP, and the Framework Element. **Therefore, the Project and Flexibility Option's contribution to cumulative impacts associated with solid waste regulations, plans, and programs would not be cumulatively considerable and cumulative impacts with respect to solid waste plans would be less than significant.**

b) Mitigation Measures

Cumulative impacts related to solid waste for both the Project and Flexibility Option would be less than significant; no mitigation measures would be required.

c) Level of Significance After Mitigation

Cumulative impacts related to solid waste for both the Project and Flexibility Option were determined to be less than significant without mitigation.

⁵³ County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 6.