# IV. Environmental Impact Analysis

# M.3 Utilities and Service Systems—Solid Waste

## 1. Introduction

This section of the Recirculated 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 (CoIWMP) 2020 Annual Report prepared by the County of Los Angeles Department of Public Works in October 2021.

## 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);

- County of Los Angeles Countywide Integrated Waste Management Plan;
- 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;
- Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System; and
- City of Los Angeles Green Building Ordinance.

### (1) State

#### *(a) Assembly Bill 939: Integrated Waste Management Act of 1089*

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.

[1] *California Public Resources Code, Section 41821.*

*(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 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

[2] *CalRecycle, Senate Bill 1374 (2002), August 24, 2018*

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 2022 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 Code. The 2022 CALGreen Code went into effect January 1, 2023.

*(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 reduced,[5] 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.

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[3] *CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/, accessed June 9, 2023.*

[4] *California Department of General Services, Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/CALGreen, accessed June 30, 2023.*

[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.*

## (2) Regional

### *(a) Countywide Integrated Waste Management Plan*

Pursuant to AB 939, each County is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP 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 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the CoIWMP's horizon year of 2035.[6] As stated within the CoIWMP 2020 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 2035.[8]

## (3) Local

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

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

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[6] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pp. 28 and 45.*

[7] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021.*

[8] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021.*

adequate infrastructure in the future. 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 needs.[9]

*(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.[10] 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.[11] 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.[12] The Solid Waste Integrated Resources Plan is intended to provide a long-term outline of the policies, programs, infrastructure, regulations, incentives, new green jobs,[13] technology, and financial strategies necessary to achieve 90-percent diversion of solid waste by 2025.[14] 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

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[9] *City of Los Angeles, Department of City Planning, Citywide General Plan Framework, 2001, Chapter 9.*

[10] *LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan, 2013.*

[11] *LASanitation, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs).*

[12] *LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.*

[13] *"Green jobs" is the term for work force opportunities created by companies and organizations whose mission is to improve environmental quality.*

[14] *LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan, 2013.*

adopted by the State of California, the City achieved a landfill diversion rate of approximately 76 percent in 2012, exceeding Mayor Villaraigosa's goal.[15]

*(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.[16] This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent by 2025.[17] 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 in January 2011.[18] These facilities process

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[15] *LASanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=sc2bv57ho_78&_afrLoop=302690459702255&_afrWindowMode=0&_afrWindowId=ival6l59y#!%40%40%3F_afrWindowId%3Dival6l59y%26_afrLoop%3D302690459702255%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82, accessed June 9, 2023.*

[16] *Los Angeles Municipal Code, City Ordinance No. 184,665.*

[17] *Los Angeles Municipal Code, City Ordinance No. 184,665.*

[18] *LASanitation, Construction & Demolition Recycling, 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?_afrLoop=302750877623885&_afrWindowMode=0&_afrWin*

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received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.[19] Additionally, compliance with the Ordinance and 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 construction and demolition (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,[20] 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.[21]

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.[22] This

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[19] *LASanitation, Construction & Demolition Recycling, 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?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed June 9, 2023.*

[20] *City of Los Angeles Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

[21] *City of Los Angeles, Final Implementation Plan for Exclusive Commercial and Multifamily Franchise Hauling System, Final Report, April 2013.*

[22] *LASanitation, Construction & Demolition Recycling, 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?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, June 9, 2023.*

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. 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) City of 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 the CALGreen Code and is implemented through the building permit process.

## b. Existing Conditions

Demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. The analysis herein is based in part on the CoIWMP 2020 Annual Report (the most recent Annual Report available), which was completed by the County of Los Angeles Department of Public Works in October 2021.

Based on the 2020 Annual Report, a discussion of the County's waste disposal at in- and out-of-County landfills and transformation facilities, existing landfill capacity data, and an overview of various technologies in use to reduce solid waste disposal is provided below.

### (1) Solid Waste Generation and Disposal in the County of Los Angeles

*(a) In-County Landfills*

Landfills within the County are categorized as either Class III or inert landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert

landfills.[23] Ten Class III landfills and one permitted inert landfill with solid waste facility permits are located within the County.[24] Figure IV.M.3-1 on page IV.M.3-11 illustrates the locations of County landfills in relation to the Project Site.

*(i) Class III Landfills*

As shown in Table IV.M.3-1 on page IV.M.3-12, based on the information provided in the 2020 Annual Report, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 142.67 million tons. In 2020, approximately 6.154 million tons of solid waste were disposed of at the County's Class III landfills. In addition, approximately 0.382 million tons of solid waste were disposed of at County transformation facilities in 2020.[25]

As summarized in Table IV.M.3-1, of the remaining Class III landfill capacity in the County of Los Angeles, approximately 128.55 million tons are available to the City of Los Angeles.[26] As landfills operate in a free-enterprise system, their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

The 2020 Annual Report evaluated seven disposal capacity analysis scenarios and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period under six of the seven scenarios, including the status quo or existing conditions scenario (Scenario II).[27] However, under the first of the seven disposal capacity analysis scenarios where only existing in-county Class III landfills and transformation facilities are used, there is a diversion rate of 65 percent, and no other options are available, such as exporting to out-of-County facilities or the development of new alternative technologies, the countywide cumulative need for Class III landfill disposal capacity, which would be an estimated approximately 154.1 million tons in 2031, would

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[23] *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

[24] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.*

[25] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.*

[26] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Burbank, Calabasas, Pebbly Beach, San Clemente, Scholl Canyon, and Savage Canyon) according to the 2020 Annual Report.*

[27] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pp. 6 and 53.*

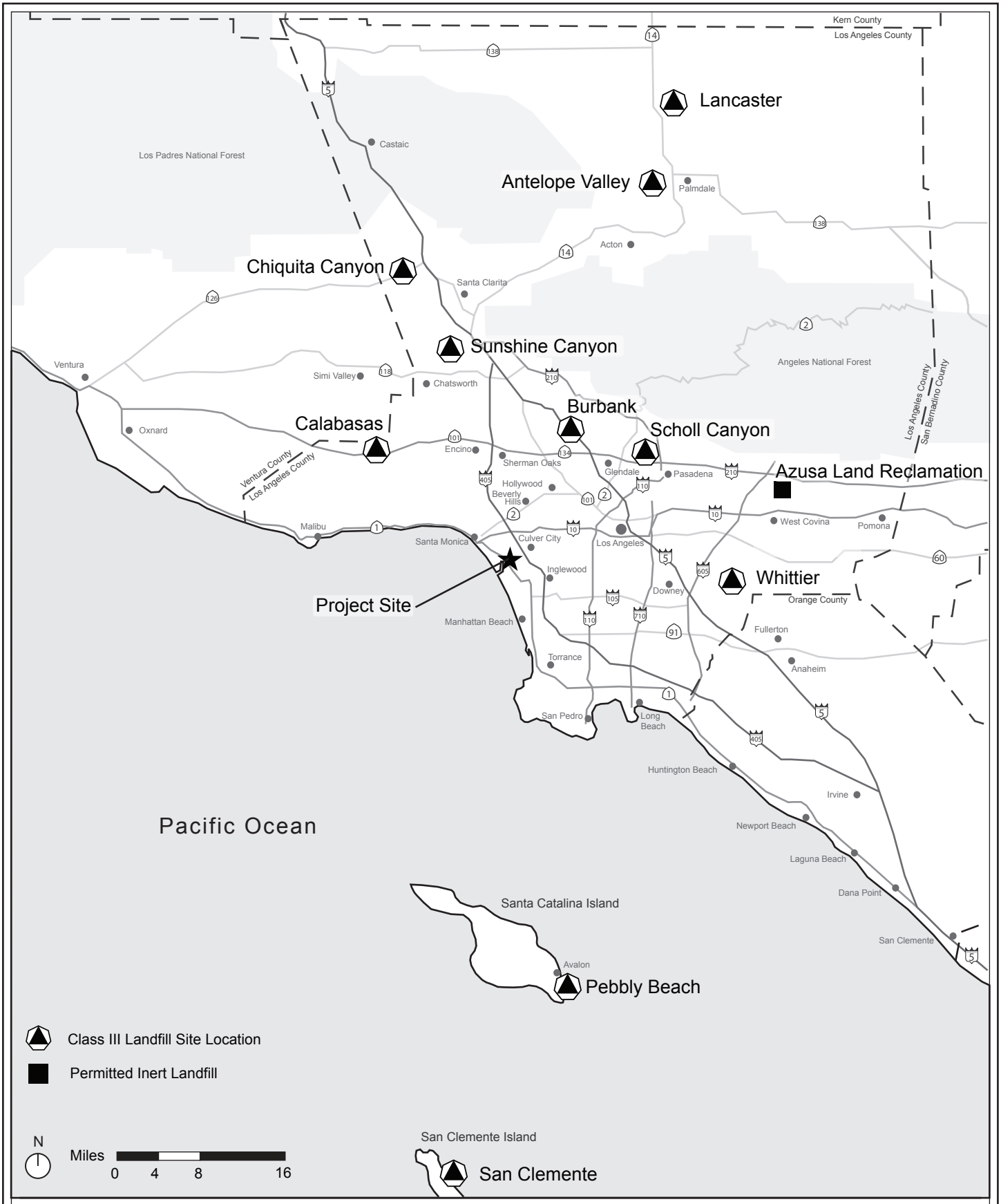


**Figure IV.M.3-1**
County of Los Angeles Landfills

Source: Google Earth, 2020.

**Table IV.M.3-1**
**Solid Waste Disposal and Estimated Remaining Capacity for County of Los Angeles Landfills**

| | Location | 2020 Total Disposal (million tons)[a] | Estimated Remaining Permitted Capacity as of 12/31/20 (million tons)[b] |
|---|---|---|---|
| **Class III** | | | |
| Antelope Valley[c] | Palmdale | 0.770 | 10.18 |
| Burbank[d] | Burbank | 0.033 | 2.37 |
| Calabasas[e] | Unincorporated | 0.289 | 4.03 |
| Chiquita Canyon | Unincorporated | 1.883 | 54.42 |
| Lancaster | Unincorporated | 0.125 | 9.87 |
| Pebbly Beach[f] | Unincorporated | 0.004 | 0.03 |
| San Clemente[g] | San Clemente Island | 0.0004 | 0.019 |
| Savage Canyon[i] | Whittier | 0.087 | 4.26 |
| Scholl Canyon[h] | Glendale/ Unincorporated | 0.453 | 3.41 |
| Sunshine Canyon City/County | Los Angeles/ Unincorporated | 2.508 | 54.08 |
| **Class III Total Overall** | | **6.154** | **142.67** |
| **Class III Total Open to City of Los Angeles** | | **5.286** | **128.55** |
| **Permitted Inert Waste Landfills** | | | |
| Azusa Land Reclamation[j] | Azusa | 0.322 | 64.64 |
| **Permitted Inert Total** | | **0.322** | **64.64** |

*Landfills open to the City of Los Angeles are highlighted in gray within the table.*

[a] *Disposal quantities are based on actual tonnages reported by owners/operators of permitted solid waste disposal facilities to the Los Angeles County Department of Public Works' Solid Waste Information Management System.*

[b] *Estimated Remaining Permitted Capacity is based on landfill owner/operator's response in a written survey conducted by the Los Angeles County Department of Public Works in July 2020, as well as site-specific permit criteria established by local land use agencies, Local Enforcement Agencies, CalRecycle, California Regional Water Quality Control Board, and the South Coast Air Quality Management District.*

[c] *The City of Palmdale approved the expansion and combined Antelope Valley Landfills #1 and #2 on September 19, 2011.*

[d] *Limited to the City of Burbank use only.*

[e] *Limited to Calabasas Wasteshed, as defined by Los Angeles County Ordinance No. 91-0003, which is composed of the incorporated cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks; that portion of the City of Los Angeles bordered by the northerly line of Township 2 North on the north, Interstate Highway 405 on the east, Sunset Boulevard and the Pacific Ocean on the south, and the City boundary on the west; and certain unincorporated areas in the Counties of Los Angeles and Ventura.*

[f] *Land Use Permit (LUP) expires July 29, 2028.*

[g] *Landfill owned and operated by the U.S. Navy.*

[h] *Limited to Scholl Canyon Wasteshed as defined by City of Glendale Ordinance No. 4780, which is defined as County incorporated cities of Glendale, La Canada Flintridge, Pasadena, South Pasadena,*

**Table IV.M.3-1 (Continued)**
**Solid Waste Disposal and Estimated Remaining Capacity for County of Los Angeles Landfills**

| | Location | 2020 Total Disposal (million tons)[a] | Estimated Remaining Permitted Capacity as of 12/31/20 (million tons)[b] |
|---|---|---|---|
| | *San Marino, and Sierra Madre; County unincorporated communities known as Altadena, La Crescenta, Montrose; unincorporated area bordered by the cities of San Gabriel, Rosemead, Temple City, Arcadia, and Pasadena; and the unincorporated area immediately to the north of the City of San Marino bordered by the City of Pasadena on the west, north and east sides.* | | |
| [i] | *Limited to use by the City of Whittier and waste haulers contracted with the City of Whittier.* | | |
| [j] | *By Court Order, on October 2, 1996, the California Regional Water Quality Control Board—Los Angeles Region ordered the Azusa Land Reclamation Landfill to stop accepting Municipal Solid Waste.* | | |
| *Source:* | *Eyestone Environmental, 2023, based on information from County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report,* October 2021, Appendix E-2, Table 4*.* | | |

exceed the 2020 remaining permitted Class III landfill capacity of 142.67 million tons.[28] Other constraints that also may limit the accessibility of Class III landfill capacity include wasteshed boundaries, geographic barriers, weather, and natural disasters.

The disposal capacity analysis scenarios included in the 2020 Annual Report demonstrate that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out-of-County disposal, including waste-by-rail.[29]

*(ii) Permitted Inert Waste Landfills*

As of 2020, Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit. As shown in Table IV.M.3-1 on page IV.M.3-12, Azusa Land Reclamation does not face capacity issues given the remaining disposal capacity in 2020 (the most recent year for which data are available) is estimated at approximately 64.64 million tons. In 2020, approximately 0.322 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at Azusa Land Reclamation. Given the remaining permitted capacity and based on the average disposal rate of 1,032 tons per day in 2020, this landfill's capacity

[28] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 42.*

[29] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pp. 6 and 53.*

would be exhausted in 201 years.[30] However, based on the landfill's solid waste facility permit closure date, the landfill is expected to close in 2045 unless its operating permit is extended.[31] Regardless, the permitted inert waste landfill serving the County is anticipated to have adequate long-term capacity.

*(iii) Inert Debris Facilities*

Inert debris facilities include Inert Debris Engineered Fill Operations (IDEFO) and other facilities that process inert waste and other construction and demolition waste without a full solid waste facility permit. In 2020, inert debris facilities (excluding Azusa Land Reclamation) collectively handled nearly 3.42 million tons, or approximately 2.74 million cubic yards, of material in the County.[32] Existing inert debris disposal sites in Los Angeles County are located in Irwindale, Montebello, Monrovia, and Sun Valley.[33]

*(b) Out-of-County Landfills*

Solid waste disposal at out-of-County facilities has increased in recent years. As shown in Table IV.M.3-2 on page IV.M.3-15, in 2020 (the most recent year that data were available), approximately 14,567 tons per day of County solid waste was disposed at out-of-County landfills.[34]

As shown in Table IV.M.3-2 on page IV.M.3-15, waste-by-rail (WBR) has the potential to create substantial solid waste disposal capacity. WBR systems allow the County to transport waste via existing railways to remote out-of-County disposal facilities. They involve the collection of recyclable waste at material recovery facilities and the loading of remaining non-hazardous wastes into rail-ready shipping containers. These containers are delivered by truck to local rail yard loading facilities where they are then transported to remote landfills designed and permitted to receive waste via rail. One WBR landfill that may become available for use by the County is the Mesquite Regional Landfill in Imperial County, located approximately 210 miles east of Downtown Los Angeles, along the Union Pacific Railroad. The Sanitation Districts of Los Angeles County completed

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[30] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.*

[31] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 36.*

[32] *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.*

[33] *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 5.*

[34] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 3.*

**Table IV.M.3-2**
**Solid Waste Disposal and Estimated Remaining Capacity for Out-of-County Landfills**

| Facility Location Owner/Operator | Rail Access | Distance from Downtown Los Angeles | 2020 Average Daily Disposal Rate (tpd-6) | 2020 Average Disposal from Los Angeles County[a,b] (tpd-6) | Permitted Daily Disposal (tpd) | Remaining Permitted Disposal Capacity[c] (million tons) |
|---|---|---|---|---|---|---|
| **Mesquite Regional Landfill**[d]<br>Imperial County<br>County Sanitation District No. 2 of Los Angeles County | Yes | 210 miles | — | — | 20,000 | 660 |
| **H.M. Holloway Landfill, Inc.**<br>Kern County<br>Holloway Environmental, LLC. | Yes | 156 miles | 1,546 | 755 | 2,000 | 2 |
| **Frank R. Bowerman Sanitary Landfill**[e]<br>Orange County<br>O.C. Waste and Recycling. | No | 45 miles | 7,331 | 2,198 | 11,500 | 101 |
| **Olinda Alpha Sanitary Landfill**[e]<br>Orange County<br>O.C. Waste and Recycling. | No | 30 miles | 7,081 | 2,687 | 8,000 | 13 |
| **Prima Deshecha Sanitary Landfill**[e]<br>Orange County<br>O.C. Waste and Recycling. | No | 60 miles | 2,298 | 283 | 4,000 | 76 |
| **El Sobrante Landfill**<br>Riverside County<br>USA Waste Services of California, Inc. | No | 60 miles | 10,546 | 4,071 | 16,054 | 137 |
| **Mid-Valley Sanitary Landfill**<br>San Bernardino County<br>San Bernardino County Solid Waste Management Division | No | 53 miles | 3,510 | 1,672 | 7,500 | 35 |

**Table IV.M.3-2 (Continued)**
**Solid Waste Disposal and Estimated Remaining Capacity for Out-of-County Landfills**

| Facility Location Owner/Operator | Rail Access | Distance from Downtown Los Angeles | 2020 Average Daily Disposal Rate (tpd-6) | 2020 Average Disposal from Los Angeles County[a,b] (tpd-6) | Permitted Daily Disposal (tpd) | Remaining Permitted Disposal Capacity[c] (million tons) |
|---|---|---|---|---|---|---|
| **San Timoteo Sanitary Landfill**<br>San Bernardino County<br>San Bernardino County Solid Waste Management Division | No | 67 miles | 901 | 357 | 2,000 | 6 |
| **Simi Valley Landfill & Recycling Center**<br>Ventura County<br>Waste Management of California, Inc. | No | 50 miles | 3,870 | 2,356 | 9,250 | 48 |
| **Total** | | | **37,083** | **14,377** | **80,304** | **1,078** |

*tpd = tons per day*

*tpd-6 = tons per day, based on 6 operating days per week*

[a] *Estimated quantity based on the data provided by the Counties in the Solid Waste Information Management System (SWIMS) and/or the Disposal Reporting System.*

[b] *Waste exported to other out-of-county landfills accounts for another 190 tons per day. Total waste exported in 2020 was approximately 14,567 tons per day.*

[c] *Estimated quantity provided by landfill operators in tons, otherwise a conversion factor of 1,200 pounds per cubic yard was used.*

[d] *The Mesquite Regional Landfill is not yet operational. When operational, Mesquite Regional Landfill will be permitted to reserve up to 1,000 tpd of available capacity for Imperial County, and up to 4,000 tpd may be transported by truck haul. The operation of the Mesquite Regional Landfill and waste by rail system (WBR) is entirely dependent on the availability of in-county and near-county disposal capacity, diversion from landfills and the cost of disposal. When the Mesquite Regional Landfill/WBR disposal capacity is needed and when the tipping fees make Mesquite Regional Landfill /WBR economically viable, then the system may begin operation.*

[e] *The County of Orange has import waste agreements to import waste into Orange County with waste hauling companies and County Sanitation Districts through June 30, 2025.*

*Source: County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021 Appendix E-2 Table 6.*

acquisition of the landfill in 2002, and completed construction of all infrastructure in December 2008. This landfill is permitted to accept up to 20,000 tons per day with a total disposal capacity for 660 million tons of solid waste, which is equivalent to a lifespan of nearly 109 years.[35] This landfill is not currently operational.[36]

*(c) Transformation Facilities*

Per Title 14, California Code of Regulations, Section 18720, a transformation facility's principal function is to convert, combust, or otherwise process solid waste by incineration, pyrolysis, distillation, gasification, or to chemically or biologically process solid waste for the purpose of volume reduction, synthetic fuel production, or energy recovery. Transformation facilities do not include biomass conversion or composting facilities. There is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery. The Southeast Resource Recovery Facility (SERRF), located in the City of Long Beach, processed approximately 0.382 million tons of solid waste in 2020 and has an available average daily capacity of 1,370 tons.[37] The SERRF will continue to operate until June 2024 at its current average daily rate during the planning period. The City of Long Beach has announced an amended agreement to provide for the continued operation of SERRF and allow for opportunities to process higher-value waste. The owner and operator of SERRF has indicated that there are no plans to increase the permitted daily capacity.[38]

*(d) Use of Conversion Technologies*

The County is exploring the use of conversion technologies to reduce future disposal needs, as well as address global climate change. These state-of-the-art technologies encompass a wide variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products in an environmentally beneficial way. The Southern California Conversion Technology Demonstration Project is an initiative of the County.[39] Conversion technologies include a variety of thermal, chemical and

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[35] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 53.*

[36] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 65.*

[37] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4.*

[38] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 35.*

[39] *Southern California Conversion Technology, About Us, http://dpw.lacounty.gov/epd/SoCalConversion/About, accessed June 12, 2023.*

biological processes that break down solid waste into usable resources, such as ethanol, biodiesel, and other green fuels.[40]

The County Department of Public Works chairs the County Integrated Waste Management Task Force's Alternative Technology Advisory Subcommittee, which evaluates and promotes the development of conversion technology projects in Southern California. One such project is the anaerobic digestion system at the CR&R Environmental Services facility in the City of Perris. This system, which broke ground in 2014, is now operational, produces renewable natural gas from organic waste, and is planned for expansion in phases and ultimately digest up to 335,000 tons per day.[41] Another project involves the anaerobic digesters at the Joint Water Pollution Control Plant in the City of Carson. This particular system ultimately produces electricity from methane, which is converted from food waste with sewage sludge. That project is expected to expand into a commercial-scale anaerobic digestion facility after a consistent food waste supply is secured.[42]

*(e) Class I Landfills*

Hazardous wastes are disposed of at Class I landfills. The closest Class I landfill to the Project Site is the Buttonwillow Landfill located in Kern County, approximately 118 miles northwest of the Project Site. Buttonwillow is a fully permitted hazardous waste facility, permitted by various State of California regulatory agencies to receive, store, treat and landfill a variety of hazardous and non-hazardous waste streams. This facility is capable of managing a large number of Resource Conservation and Recovery Act (RCRA) hazardous wastes, California hazardous waste, and non-hazardous waste for stabilization treatment, solidification, and landfill. Buttonwillow Landfill has a permitted landfill capacity of 13.25 million cubic yards and utilizes treatment methods that support the reduction of waste toxicity and disposal.[43,44]

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[40] *Southern California Conversion Technology, About: Why Conversion Technologies?, http://dpw.lacounty.gov/epd/SoCalConversion/About/WhyConversionTechnologies, accessed June 9, 2023.*

[41] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 10.*

[42] *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 10.*

[43] *Clean Harbors Buttonwillow, LLC, Nonhazardous, Nonputrescible, Industrial Solid Waste Codisposal Plan, prepared for Kern County Public Health Services Department, February 2019.*

[44] *CalRecycle, SWIS Facility Detail, Clean Harbors Buttonwillow LLC, www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3922?siteID=733, accessed June 9, 2023.*

Hazardous wastes may also be disposed of at Kettleman Hills Facility, a Class I landfill located in Kings County, approximately 165 miles northwest of the Project Site. The Kettleman Hills Facility is permitted to accept most types of hazardous wastes as defined by the U.S. Environmental Protection Agency and the State of California. Materials accepted at the Kettleman Hills Facility include asbestos debris, petroleum-contaminated soils and debris, soils and debris with metal contamination, household hazardous wastes from collection events, baghouse dusts, various ash waste, filter cake, catalyst solids, latex paint, groundwater, stormwater, clarifier water, and various sludges.[45]

### (2) Solid Waste Generation and Disposal in the City of Los Angeles

LASAN provides solid resources collection services to 750,000 households, comprising 530,000 single-family and 220,000 multi-family units.[46] The four-bin collection system consists of blue bins (recyclables), green bins (tree and yard trimmings), black bins (residual waste) and brown bins (horse manure). Using the calculation methodology adopted by the State of California, the City has achieved a landfill diversion rate of 76.4 percent.[47] As previously discussed, while LASAN generally provides waste collection services to single-family and some multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

As shown in Table IV.M.3-3 on page IV.M.3-20, in 2020 the City of Los Angeles disposed of approximately 3.16 million tons of solid waste at the County's Class III landfills.[48] The 3.16 million tons of solid waste accounted for approximately 2.2 percent of the total remaining capacity (142.67 million tons) for the County's Class III landfills open to the City in 2020.[49] As indicated in Table IV.M.3-3, as of December 31, 2020, the latest period for which annual data are available, the remaining disposal capacity for the Azusa

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[45] *Waste Management, Inc., Kettleman Hills, Facility Overview, http://kettlemanhillslandfill.wm.com/fact-sheets/2011/facility-overview.jsp, accessed June 9, 2023.*

[46] *LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=1885068648914941 1#!, accessed June 9, 2023.*

[47] *LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=1885068648914941 1#!, accessed June 9, 2023.*

[48] *County of Los Angeles, Department of Public Works, Solid Waste Information System, Solid Waste Disposal Summary Report by Facilities: Los Angeles (Reporting Period: January 2020 to December 2020). These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.*

[49] *(3.16 million tons ÷ 142.67 million tons) X 100 = 2.2 percent..*

**Table IV.M.3-3**
**City of Los Angeles Solid Waste Disposal (2020)[a]**

| Landfill/Transformation Facility | 2020 Total Disposal[a] (tons) |
|---|---|
| **Class III Landfills** | |
| Antelope Valley Recycling and Disposal Facility | 326,377.87 |
| Calabasas Landfill | 122,143.12 |
| Chiquita Canyon Landfill | 1,086,721.00 |
| Lancaster Landfill | 6,135.46 |
| Savage Canyon Landfill | 163.95 |
| Scholl Canyon Landfill | 3,925.02 |
| Sunshine Canyon City/County Landfill | 1,613,352.25 |
| *Total Class III Landfills* | *3,158,818.67* |
| **Inert Landfills** | |
| Azusa Land Reclamation | 46,312.02 |
| **Total Solid Waste Disposal for City of Los Angeles** | **3,205,130.69** |

*Note: Numbers may not total due to rounding.*

[a] *Additional materials were also received for recycling and beneficial use (e.g., construction and demolition debris, sediment, green waste, auto shred) that are not part of these disposal amounts.*

*Source: County of Los Angeles, Department of Public Works, Solid Waste Information System, Solid Waste Disposal Summary Report by Facilities: Los Angeles (Reporting Period: January 2020 to December 2020).*

Land Reclamation, a permitted inert waste landfill open to the City of Los Angeles, is approximately 64.64 million tons. As shown in Table IV.M.3-3, in 2020, the City landfilled approximately 46,312.02 tons of construction and demolition waste at Azusa Land Reclamation. This amount accounts for 0.07 percent of the total remaining capacity at the landfill.[50]

## (3) City of Los Angeles Hazardous Waste Disposal Programs

LASAN has established seven permanent waste collection sites throughout the City known as S.A.F.E. (solvents/automotive/flammables/electronics) Centers, which are open every weekend to allow residents and businesses to conveniently dispose of their household hazardous waste. These S.A.F.E. centers generally accept used motor oil and filters; paint and solvents; e-waste, such as computers, cell phones and televisions;

[50] *(46,312.02 tons ÷ 64.64 million tons) × 100 = 0.07 percent.*

household cleaning products; car and household batteries; fluorescent tubes and bulbs; home-generated sharps, such as needles and lancets; and unused medicine (except controlled substances).[51] To facilitate disposal of household hazardous waste throughout the City, LASAN also provides Mobile Collection Events throughout the City where residents can drop off waste for proper disposal.[52] In addition, CalRecycle has certified used motor oil collection centers throughout the state. These locations accept uncontaminated oil throughout the year. For further discussion of the use, storage, handling, and disposal of hazardous materials and hazardous wastes, refer to Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR.

### (4) City of Los Angeles Recycling Programs

LASAN develops and implements source reduction, recycling, and composting programs in the City. Such programs include mandatory commercial organics recycling, commercial recycling, blue bin recycling, green bin recycling, tire recycling, and multi-family residential recycling, among others. LASAN and the Department of Building and Safety also implement the City's Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires that all haulers and contractors handing construction and demolition waste must obtain a waste hauler permit for hauling of such material to a certified construction and demolition processing facility.

### (5) On-Site Waste Generation

The Project Site is currently developed with retail and restaurant uses with accompanying surface parking areas. As summarized in Section II, Project Description, of this Recirculated Draft EIR, existing uses comprise a total of approximately 100,781 square feet of retail space and 418 parking spaces. The existing uses within the Project Site generate municipal solid wastes typical of commercial uses, including, but not limited to, paper, glass, metal, plastics, food waste, wood, cardboard, and landscape waste. As shown in Table IV.M.3-5 on page IV.M.3-28 in the analysis below, based on the City's solid waste generation rates, the Project Site currently generates an estimated 297 tons of solid waste per year.

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[51] *LASanitation, Hazardous Waste S.A.F.E. Centers & Mobile Collection Events, S.A.F.E. Center Flyer.*

[52] *LASanitation, Hazardous Waste, S.A.F.E. Centers & Mobile Collection Events, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-hw/s-lsh-wwd-s-c-hw-safemc?_adf.ctrl-state=qbflb4qjn_273&_afrLoop=3331564728185060 3#!, accessed June 9, 2023.*

# 3. Project Impacts

## a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, 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 impair 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.***

In assessing impacts related to solid waste in this section, the City relies upon the above-specified Appendix G thresholds as the thresholds of significance. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in analyzing the Appendix G Thresholds.

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

- 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 Source Reduction and Recycling Element or its updates, the City of Los Angeles Solid Waste Management Policy Plan, the City Framework or the City Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element.[53]

[53] *Waste diversion goals have been identified for a limited number of targeted waste generators and materials. Future updates of the Source Reduction and Recycling Element may expand the land uses and materials covered, or modify the current waste diversion goals. Source: LASanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, January 2006.*

## b. Methodology

The Project's potential solid waste impacts are based on an analysis of the estimated amount of waste generated during both construction and operation of the Project relative to area-wide disposal rates and the remaining capacity at facilities serving the Project area. The Project's solid waste generation is considered both in terms of total amount of waste generated, as well as the amount of waste that would actually be disposed of at a landfill following diversion (e.g., recycling, reuse, or other methods). For the assessment of cumulative impacts related to solid waste, the projected cumulative solid waste generation is considered in light of the estimated available capacities of receiving landfills and the various disposal capacity analysis scenarios analyzed in the 2020 Annual Report.

### (1) Construction

Anticipated solid waste generation for the Project's construction activities was determined using rates provided by the United States Environmental Protection Agency (USEPA) based on the types of land use and amount of floor area proposed for demolition and construction. The results of these calculations were compared with the available capacity at the landfills that currently accept construction waste from the area of the City that includes the Project Site in order to assess the significance of the Project's solid waste disposal.

### (2) Operation

The Project's waste generation and anticipated waste disposal needs during operation were estimated using the waste generation factors and disposal data provided in the LASAN, City Waste Characterization and Quantification Study (July 2002) for non-residential uses, as well as the solid waste generation rate for residential uses provided in the *L.A. CEQA Thresholds Guide*. The Project's estimated waste generation and waste disposal quantities were then compared with the remaining capacity at Class III landfills open to the City of Los Angeles to determine whether adequate capacity would be available to accommodate the Project.

## c. Project Design Features

The following project design features are proposed with regard to solid waste:

**SW-PDF-1:** Use of building materials with a minimum of 10 percent recycled content for the construction of the Project.

# d. Analysis of Project Impacts

***Threshold (a): Would the Project generate solid waste in excess of State of local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

## (1) Impact Analysis

### *(a) Construction Impacts*

#### *(i) Solid Waste Collection Route*

Construction of the Project would involve demolition and building construction activities. In accordance with City requirements, the Project's construction and demolition wastes (e.g., wood, concrete, asphalt, cardboard, brick, glass, plastic, and metal) would be recycled or collected by private waste haulers contracted by the Applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at Azusa Land Reclamation, the County's permitted inert landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project would not result in the need for an additional solid waste collection route.

#### *(ii) Solid Waste Disposal Facilities*

As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options: Option A and Option B. Under Option A, the Project proposes the development of 658 multi-family residential units and 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and approximately 13,650 square feet of restaurant space. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space.

As shown in Table IV.M.3-4 on page IV.M.3-25, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project under Option A would generate a total of approximately 18,816 tons of demolition debris and 2,438 tons of construction debris, for a combined total of 21,254 tons of construction-related waste generation. Option B would generate a total of approximately 2,123 tons of construction debris, for a combined total of 20,939 tons of construction-related waste generation. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Thus, the Project's soil export is not included in these construction-related waste generation totals.

**Table IV.M.3-4**
**Project Demolition and Construction Waste Generation for Option A and Option B**

| Land Use | Size/Units | Generation Rate[a] (lbs/sf) | Total (tons) |
|---|---|---|---|
| **Existing Uses** | | | |
| Retail | 100,781 sf | 155 | 7,811 |
| Surface Parking | 142,000 sf | 155 | 11,005 |
| ***Subtotal for Demolition*** | | | ***18,816*** |
| | | | |
| **Total Proposed Uses—Option A** | | | |
| Residential (658 du) | 647,029 sf | 4.38 | 1,417 |
| Retail | 13,650 sf | 3.89 | 27 |
| Restaurant | 13,650 sf | 3.89 | 27 |
| Parking Structure | 497,096 sf | 3.89 | 967 |
| ***Subtotal for Construction*** | | | ***2,438*** |
| **Total (prior to recycling)** | | | **21,254** |
| **Total (after 75 percent recycling)[b]** | | | **5,314** |
| | | | |
| **Total Proposed Uses—Option B** | | | |
| Residential (425 du) | 430,153 sf | 4.38 | 942 |
| Office | 90,000 sf | 3.89 | 175 |
| Retail | 20,000 sf | 3.89 | 39 |
| Restaurant | 20,000 sf | 3.89 | 39 |
| Parking Structure | 497,096 sf | 3.89 | 967 |
| ***Subtotal for Construction*** | | | ***2,123*** |
| **Total (prior to recycling)** | | | **20,939** |
| **Total (after 75 percent recycling)[b]** | | | **5,235** |

*sf = square feet*

[a] *U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 2-4 and 2-6.*

[b] *Pursuant to requirements of SB 1374.*

*Source: TCA Architects; Eyestone Environmental, June 2023.*

Pursuant to the requirements of SB 1374, the Project under both development options would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 and 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75

percent, this analysis conservatively assumes a diversion rate of 75 percent. Applying this rate, under Option A, the Project would dispose of approximately 5,314 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. Option B would dispose of approximately 5,235 tons of construction-related waste in the County's permitted inert landfill throughout the construction period.

Under Option A, the amount of construction and debris waste would represent approximately 0.0053 percent[54] of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 64.64 million tons. Under Option B, the amount of construction and debris waste would also represent approximately 0.0081 percent[55] of the Azusa's Land Reclamation Landfill's existing capacity (refer to Table IV.M.3-1 on page IV.M.3-12). Thus, the total amount of construction and demolition waste generated by the Project under both options would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. As Azusa Land Reclamation Landfill generally does not face capacity shortages, as discussed above in the Existing Conditions subsection, and the County's inert waste landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste.

**Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, construction impacts to solid waste facilities would be less than significant.**

*(iii) Hazardous Waste*

As discussed in Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR, in the event asbestos containing materials, lead based paints, and polychlorinated biphenyls are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, state, and federal regulations prior to demolition activities. In addition, in the event contaminated soils are uncovered during construction, any such materials shall be taken to a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill or the Kettleman Hills Facility for disposal.

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[54] *(5,314 tons / 64.64 million tons) x 100 = 0.0082 percent*

[55] *(5,235 tons / 64.64 million tons) x 100 = 0.0081 percent*

Construction activities would require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of the proposed structures. Those hazardous materials that are not consumed during the construction process would also require proper disposal at a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill Facility or the Kettleman Hills Waste Facility, in accordance with all of the requirements of relevant regulatory agencies, including the Los Angeles Fire Department (LAFD), City of Los Angeles Department of Public Works, Los Angeles Regional Water Quality Control Board (LARWQCB), and/or the Department of Toxic Substances Control (DTSC). As described above, the Buttonwillow Landfill is the closest Class I landfill to the Project Site and has a permitted landfill capacity in excess of 10 million cubic yards. As such, the Project would be served by a landfill that could accept hazardous waste from the Project Site if needed. **Compliance with applicable regulatory requirements would reduce the potential for Project impacts associated with disposal of construction-related hazardous waste to a less-than-significant level.**

*(b) Operational Impacts*

*(i) Solid Waste Collection Route*

Operation of the Project would generate municipal solid waste typical of residential and commercial developments. Solid waste generated by the Project would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.[56] The transport of Project-generated solid waste to waste management/disposal facilities would occur along existing solid waste routes of travel. Furthermore, such waste would be disposed of in accordance with the recycLA program described above. As such, the Project would not result in the need for additional solid waste collection routes to adequately handle Project-generated waste. **Therefore, potential Project impacts associated with solid waste conveyance capacity during operation would be less than significant.**

*(ii) Solid Waste Disposal Facilities*

Operation of the new uses on the Project Site would generate solid waste. As shown in Table IV.M.3-5 on page IV.M.3-28, when accounting for the removal of the existing uses, operation of the Project under Option A would result in a net increase of

[56] *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately receive Project-generated waste. However, it is assumed that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

**Table IV.M.3-5**
**Project Solid Waste Generation**

| Land Use | Area/Units | Employees[a] Households or Visitors | Solid Waste Generation Factor[b,c] (tons/employee or household/year) | Waste Generation (tons/year) |
|---|---|---|---|---|
| **Existing Uses** | | | | |
| Retail | 92,249 sf | 184 | 0.91 tons/employee | 168 |
| Restaurant | 8,532 sf | 34 | 2.98 tons/employee | 102 |
| ***Total Existing*** | | | | ***270*** |
| | | | | |
| **Total Proposed Uses—Option A** | | | | — |
| Residential Units | 658 du | — | 2.23 tons/household | 1,467 |
| Retail | 13,650 sf | 27 | 0.91 tons/employee | 25 |
| Restaurant | 13,650 sf | 55 | 2.98 tons/employee | 164 |
| ***Total Proposed*** | | | | ***1,656*** |
| **Total Net Generation (Proposed – Existing to be Removed)** | | | | **1,386** |
| **Total Net Disposal (after 50% diversion/recycling)** | | | | **693** |
| | | | | |
| **Total Proposed Uses—Option B** | | | | |
| Residential Units | 425 du | — | 2.23 tons/household | 948 |
| Office | 90,000 sf | 360 | 0.37 tons/employee | 133 |
| Retail | 20,000 sf | 40 | 0.91 tons/employee | 36 |
| Restaurant | 20,000 sf | 80 | 2.98 tons/employee | 238 |
| ***Total Proposed*** | | | | ***1,355*** |
| **Total Net Generation (Proposed – Existing to be Removed)** | | | | **1,085** |
| **Total Net Disposal (after 50% diversion/recycling)** | | | | **543** |

*sf = square feet*

*du = dwelling unit*

*Note: Numbers may not sum due to rounding.*

[a] *Employee Generation Rates from City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.*

[b] *Non-residential yearly solid waste generation factors from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.91 tons per employee per year (Retail—Miscellaneous) for retail uses, 2.98 tons per employee per year (Retail—Restaurant) for restaurant uses, and 0.37 tons per employee per year (Services—Business) for office uses.*

[c] *Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. City CEQA Thresholds Guide.*

*Source: Eyestone Environmental, 2023.*

approximately 1,386 tons of solid waste annually. Option B would result in a net increase of approximately 1,085 tons of solid waste annually. The Project would be subject to AB 341, which provides that all businesses that generate more than four cubic yards of solid waste per week and multi-family complexes with five or more units arrange for recycling services. In accordance with AB 341, the Project would maintain a solid waste diversion rate of at least 50 percent. In addition, the Project would be subject to the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

Conservatively assuming a minimum diversion rate of approximately 50 percent, the net increase in solid waste disposal at landfills associated with the Project under Option A would be approximately 693 tons per year (1.90 tons per day) and under Option B it would be approximately 543 tons per year (1.49 tons per day), as shown in Table IV.M.3-5 on page IV.M.3-28. The net increase associated with Option A of the Project would represent an approximate 0.021-percent[57] increase in the City's annual solid waste disposal quantity based on the City's 2020 disposal of approximately 3.16 million tons. The net increase associated with Option B of the Project would represent an approximate 0.017 percent[58] increase in the City's annual solid waste landfill disposal quantity (refer to Table IV.M.3-3 on page IV.M.3-20).[59]

Project-generated solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. As shown in Table IV.M.3-1 on page IV.M.3-12, the estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 142.67 million tons as of December 31, 2020.[60,61] Thus, the Project's net increase of 693 tons of annual solid waste disposal under Option A would represent approximately 0.0005 percent[62] of the estimated remaining Class III landfill capacity available to the City of Los Angeles. Under

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[57] *(693 tons ÷ 3,205,130.69 tons) × 100 = 0.021*

[58] *(543 tons ÷ 3,205,130.69 tons) × 100 = 0.017*

[59] *County of Los Angeles, Department of Public Works, Solid Waste Information System, Solid Waste Disposal Summary Report By Facilities by Los Angeles (Reporting Period: January 2020 to December 2020).*

[60] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Burbank, Calabasas (outside of Calabasas Wasteshed), Pebbly Beach, San Clemente, Scholl Canyon, and Savage Canyon) according to the 2020 Annual Report.*

[61] *From the Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021. Estimated remaining Permitted Capacity based on landfill owner/operator responses in a written survey by Los Angeles County Department of Public Works as well as a review of the site specific permit criteria established by local land use agencies, Local Enforcement Agencies, California Regional Water Control Board, and the South Coast Air Quality Management District.*

[62] *(693 tons ÷ 142.67 million tons) × 100 = 0.0005 percent*

Option B, the Project's net increase of 543 tons of annual solid waste disposal would represent approximately 0.0004 percent[63] of the estimated remaining Class III landfill capacity available.

As previously discussed, the 2020 Annual Report indicates that, assuming that no other options are available, such as exporting to out-of-County facilities or the development of new alternative technologies, the countywide cumulative need for Class III landfill disposal capacity within the next 15 years (i.e., 2035) of approximately 154.1 million tons will exceed the 2020 remaining permitted Class III landfill capacity of 142.67 million tons in 2031.[64] Constraints that also may limit the accessibility of Class III landfill capacity include wasteshed boundaries, geographic barriers, weather, and natural disasters. Therefore, the 2020 Annual Report evaluated seven disposal capacity analysis scenarios to determine whether the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period.[65] Under Scenario I, which conservatively considers only the utilization of permitted in-County disposal capacity, the County would not be able to meet the disposal needs of all jurisdictions through the 15-year planning period. However, the 2020 Annual Report demonstrated that all six other scenarios, including Scenario II, which reflects the current status quo or existing conditions, would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with the implementation of various strategies to varying degrees.[66] Specifically, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste-by-rail.[67]

Furthermore, the County will continue to address landfill capacity through the preparation of CoIWMP Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning

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[63] *(543 tons ÷ 142.67 million tons) × 100 = 0.0004 percent*

[64] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 42.*

[65] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 43.*

[66] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, p. 53.*

[67] *County of Los Angeles, Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pp. 53 and 54.*

directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2020 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2020 Annual Report to adequately meet countywide disposal needs through 2035 and beyond without capacity shortages. These strategies include maximizing waste reduction and recycling; expanding existing landfills; promoting and developing alternative technologies; expanding transfer and processing infrastructure; and using out-of-County disposal (including waste-by-rail). **Thus, based on the amount of solid waste to be generated by the Project and the waste reduction measures that would be implemented and availability of sufficient landfill capacity under the status quo scenario (i.e., including the use of exports to out-of-County landfills), Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, potential Project impacts associated with solid waste landfill disposal capacity during operation would be less than significant.**

### (2) Mitigation Measures

Project-level impacts with regard to solid waste would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project-level impacts related to solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

***Threshold (b): Would the Project not comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

### (1) Impact Analysis

#### *(a) Construction*

Project development would be required to comply with applicable federal, state, and local statutes and regulations related to solid waste. An evaluation of regulatory consistency is provided below.

The Project would provide recycling containers on-site during construction, in accordance with City Ordinance No. 171,687. Additionally, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills in accordance with SB 1374 and other regulatory requirements, and would implement Project Design Feature SW-PDF-1 requiring the use of building materials with a minimum of 10 percent recycled content, which together would exceed state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939, SB 1374, and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/L.A.'s Green New Deal.

As discussed further above, in the event asbestos containing materials, lead based paints, or polychlorinated biphenyls are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, state, and federal regulations prior to demolition activities. In addition, although not expected, it is possible that contaminated soils may be uncovered during earthwork. Any such materials shall be taken to a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill or the Kettleman Hills Facility for disposal. In addition, any construction-related hazardous materials remaining after completion of construction activity would be properly disposed at a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill Facility or the Kettleman Hills Waste Facility, in accordance with applicable LAFD, Department of Public Works, LARWQCB, and/or DTSC requirements. Compliance with such requirements would reduce the potential for Project impacts associated with the disposal of construction-related hazardous waste to a less-than-significant level.

**In summary, Project construction would not conflict with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.**

*(b) Operation*

The Project would provide recycling containers and associated storage areas on-site during the operational phase, in accordance with City Ordinance No. 171,687. Additionally, the Project would comply with the City's Green Building Ordinance. Furthermore, the Project would comply with the recycLA franchise system. Finally, the Project would comply with AB 939 and the City's Solid Waste Management Policy Plan and achieve at least a 50-percent waste diversion rate. Therefore, the Project would not conflict with solid waste policies and objectives in the City's Source Reduction and Recycling Element or its updates, the City's Solid Waste Management Policy Plan, General Plan Framework

Element, or Curbside Recycling Program, or the County Integrated Waste Management Plan.

**As such, Project operation would not conflict with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.**

### (2) Mitigation Measures

Project-level impacts with regard to consistency with solid waste statutes and policies would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project-level impacts related to consistency with solid waste statutes and regulations were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

## e. Cumulative Impacts

### (1) Impact Analysis

The geographic context for the cumulative impact analysis for solid waste is the entire County of Los Angeles because the landfills open to the City of Los Angeles generally serve the entire County. The Project and the related projects, in conjunction with growth forecasted in the County through 2027 (i.e., the Project buildout year), would cumulatively generate solid waste, thus potentially resulting in cumulative impacts on solid waste facilities. Cumulative growth in the greater Project area includes 14 specific known development projects as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Recirculated Draft EIR. These related projects primarily include retail, restaurant, residential, and office uses.

#### *(a) Construction*

##### *(i) Solid Waste Collection Routes*

Construction of the Project, in combination with the related projects would involve demolition and building construction activities. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers contracted by each project applicant and taken to City-certified waste processing facilities for sorting and final distribution, including disposal at the County's inert waste landfill. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project and each of the related projects would not

result in the need for an additional solid waste collection route. **Therefore, the Project and related projects would not result in significant cumulative impacts related to solid waste collection routes during construction. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant**.

*(ii) Solid Waste Disposal Facilities*

Construction of the Project, in conjunction with forecasted growth in the County through 2027 (inclusive of the related projects), would generate construction and demolition waste, resulting in a cumulative increase in the demand for inert waste landfill capacity. As analyzed above, the Project would dispose of approximately 5,314 tons of construction and demolition waste under Option A and approximately 5,235 tons under Option B in the County's inert waste landfills after accounting for recycling pursuant to the requirements of SB 1374. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor, it is anticipated that future cumulative development would also implement similar measures to divert construction and demolition waste from landfills and adhere to mandatory Code diversion rates for residential and non-residential uses, as applicable. Furthermore, as described above between the permitted inert waste landfill (Azusa Land Reclamation) and other landfills accepting inert waste, the County does not face inert landfill capacity issues.

**Therefore, the Project and related projects would not result in significant cumulative impacts related to inert waste facilities during construction. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts from construction would be less than significant.**

*(iii) Hazardous Waste*

As discussed in Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR, development of the Project, in combination with the related projects described in Section III, Environmental Setting, of this Recirculated Draft EIR, would require the disposal of hazardous materials. Asbestos or asbestos containing materials, lead based paints, polychlorinated biphenyls, and other ground/soil contamination may be present with the related projects sites. In the event that these hazardous materials are found in the buildings that would be demolished to accommodate site redevelopment, suspect materials would be removed prior to demolition activities, in accordance with all applicable local, state, and federal regulations discussed in Section IV.F, Hazards and Hazardous Materials, of this Recirculated Draft EIR. In addition, soils with concentrations of hazardous substances above acceptable levels would be properly handled and disposed. Any such materials would be expected to be disposed of at fully permitted hazardous materials

disposal facilities such as the Buttonwillow Landfill, which has a permitted landfill capacity of 13.25 million cubic yards, or the Kettleman Hills Facility, which was approved for expansion in 2014.[68,69]

Like the Project, construction activities of the related projects also would require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of the new or rehabilitated structures. Any hazardous materials that are not utilized during the construction process would require proper disposal at a licensed hazardous waste disposal facility, in accordance with all applicable requirements of relevant regulatory agencies, including the LAFD, City Department of Public Works, LARWQCB, and/or the DTSC. In addition, because the use of hazardous materials is largely site-specific, compliance by each individual project with such requirements would reduce the potential for cumulative impacts associated with disposal of construction-related hazardous waste to a less-than-significant level. **As such, the Project and the related projects would not result in significant cumulative impacts related to hazardous waste disposal during construction. Therefore, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Operation*

*(i) Solid Waste Collection Routes*

Operation of the Project, along with each of the related projects in the area and other forecasted growth, would generate municipal solid waste typical of residential, commercial, and institutional developments. Solid waste generated by cumulative development in the area would be recycled or collected by private waste haulers contracted by the project applicants and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.[70] The transport of solid waste generated by cumulative development to waste management/disposal facilities would continue to occur along existing solid waste routes of travel and would be a part of the City's recycLA program. As such, the Project and the related projects would not result in the need for additional solid waste collection routes to adequately handle new solid waste

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[68] *CalRecycle, SWIS Facility Detail, Clean Harbors Buttonwillow LLC, www2.calrecycle.ca.gov/SWFacilities/Directory/15-AA-0257/Detail/, accessed June 9, 2023.*

[69] *Waste Management, Inc., Kettleman Hills, Facility Overview, http://kettlemanhillslandfill.wm.com/fact-sheets/2011/facility-overview.jsp, accessed June 9, 2023.*

[70] *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately receive Project-generated waste. However, it is assumed that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

generated by the operation of cumulative development. **Therefore, the Project's contribution would not be cumulatively considerable, and cumulative impacts from operations would be less than significant.**

*(ii) Solid Waste Disposal Facilities*

Operation of the Project, in conjunction with related projects and forecasted growth, would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. As previously stated, the Countywide demand for landfill capacity is continually evaluated by the County through preparation of the County CoIWMP Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2020 Annual Report projects waste generation and available landfill capacity through 2035.[71]

According to the 2020 Annual Report, the forecasted waste generation within the County in 2027 (i.e., the anticipated Project buildout year) would be approximately 38,832,417 tons.[72] Based on a 65-percent diversion rate, as assumed in the 2020 Annual Report, an estimated 13,591,346 tons of solid waste would be disposed of at Class III landfills and transformation facilities in 2027.[73] Based on the seven disposal capacity analysis scenarios evaluated in the 2020 Annual Report, only Scenario I, Utilization of Permitted In-County Disposal Capacity Only, would result in a shortfall during the Project's buildout year; the remaining six scenarios demonstrate adequate disposal capacity.[74] Furthermore, the Project's estimated annual disposal of approximately 693 tons under Option A and 543 tons under Option B during operation would represent a small percentage (approximately 0.0051 percent and 0.0040 percent, respectively)[75,76] of the forecasted County post-diversion waste generation of 13,591,346 tons in 2027. Hence, the Project would represent a miniscule proportion of the Countywide demand for landfill capacity in 2027.

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[71] *County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pp. 28 and 45.*

[72] *County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Tables 7 and 8.*

[73] *County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 8.*

[74] *County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, pg. 53.*

[75] *(693 tons ÷ 13,591,346 tons) × 100 = 0.0051 percent*

[76] *(543 tons ÷ 13,591,346 tons) × 100 = 0.0040 percent*

As discussed above, adequate disposal capacity would be available under six of the seven disposal capacity analysis scenarios studied in the 2020 Annual Report, one of which reflects the status quo or existing conditions. Individual jurisdictions will continue to pursue the strategies set forth in the 2020 Annual Report and future annual reports in order to maintain adequate disposal capacity. These strategies include maximizing waste reduction and recycling; expanding existing landfills; promoting and developing alternative technologies; expanding transfer and processing infrastructure; and using out-of-County disposal (including waste-by-rail). **As such, significant cumulative impacts related to solid waste disposal capacity would not occur. Therefore, the Project's contribution during operation would not be cumulatively considerable, and cumulative impacts with regard to solid waste disposal capacity from operations would be less than significant.**

*(c) Consistency with Applicable Regulations*

Like the Project, development of the related projects would be required to comply with applicable federal, state, and local statues and regulations related to solid waste. An evaluation of the anticipated consistency of the Project and related projects with applicable regulations is provided below.

*(i) Construction*

The construction contractors for the Project and each related project would deliver all generated construction and demolition waste to a certified construction and demolition waste processing facility in accordance with City Ordinance No. 181,519. Furthermore, in accordance with regulatory requirements, future development projects, would implement waste reduction measures to reduce construction-related solid waste generation through the use of recycled building materials for new construction and the recycling of construction and demolition debris. Thus, the Project and related projects would promote source reduction and recycling, consistent with AB 939, SB 1374, and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/ L.A.'s Green New Deal. **Therefore, construction of the Project and the related projects would not conflict with applicable state or City solid waste regulations and would not result in significant cumulative impacts. As such, the Project's contribution during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(ii) Operation*

As discussed above, the 2020 Annual Report determined future disposal needs can be adequately met through 2035 with implementation of strategies incorporated in disposal capacity analysis Scenarios II through VII. The County will continue to address landfill capacity through the preparation of CoIWMP Annual Reports to address potential future

shortfalls in landfill capacity. In addition, jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with Countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2020 Annual Report. Based on this trend and because solid waste disposal is an essential public service that must be provided without interruption to protect public health and safety and the environment, concerted actions will continue to be taken by jurisdictions towards expanding and enhancing waste reduction and recycling programs, and implementing prudent solid waste management strategies in response to the strategies identified in the 2020 Annual Report and all future reports. In addition, these actions would be consistent with AB 939, the County Integrated Waste Management Plan, and the City's Solid Waste Integrated Resources Plan, City's General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Similar to the Project, the related projects would be required to comply with AB 939, the County Integrated Waste Management Plan, the City's Solid Waste Integrated Resources Plan, City's General Plan Framework Element, L.A.'s Green New Deal, RENEW LA Plan, and Green LA Plan, and would promote source reduction and recycling, consistent with the relevant regulations and plans identified above. **Therefore, operation of the Project and the related projects would not conflict with applicable state or City solid waste regulations and would not result in significant cumulative impacts. The Project's contribution would not be cumulatively considerable, and cumulative impacts from operations would be less than significant.**

### (2) Mitigation Measures

Cumulative impacts with regard to solid waste would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to solid waste were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.