

IV. Environmental Impact Analysis

N.3. Utilities and Service Systems – Solid Waste

1. Introduction

This section analyzes potential impacts of the Project on the existing and planned capacity of designated Class III landfills (non-hazardous municipal solid waste) and inert landfills (non-hazardous earth and earth-like products, such as yard waste, trash, direct, concrete and asphalt). This section also evaluates Project consistency with applicable requirements to divert waste and increase recycling of the waste stream.

2. Environmental Setting

a) Regulatory Framework

The following discussion summarizes the regulations governing solid waste source reduction, recycling and diversion, collection, and disposal in the City of Los Angeles (City). For discussion of hazardous waste, see Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR.

(1) State

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

The State Legislature passed the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000.¹

AB 939 requires all counties and cities to prepare a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling and composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. Annual reports are

¹ California Department of Resources, Recycling, and Recovery (CalRecycle), Waste Diversion Activities at Solid Waste Landfills and Closed and Closing Disposal Sites, August 14, 2018, <https://www.calrecycle.ca.gov/lea/advisories/50>. Accessed March 2, 2021.

required to document the jurisdiction’s achievements in meeting the requirements of AB 939, including planned and implemented solid waste diversion programs and facilities and all required supporting documentation. The Countywide Integrated Waste Management Plan (CoIWMP) also has to include a Non-Disposal Facility Element (NDFE) to identify non-disposal facilities to be used in order to assist counties in reaching AB 939’s diversion mandates. Non-disposal facilities include material recovery facilities, transfer stations, large-scale composting facilities, and other facilities that require a solid waste facility permit. Lastly, the CoIWMP has to include a Household Hazardous Waste Element (HHWE) to reduce the amount of hazardous household waste generated and to provide the County with convenient collection services and promote waste minimization/ reduction techniques. It also requires counties to develop a Siting Element that addresses how each county, and cities within that county, will manage their solid waste disposal over 15-year planning periods. The Siting Elements also include goals and policies to ease the use of out-of-County/remote landfills and foster the development of alternatives to landfill disposal (e.g., conversion technologies). See further discussion of the Los Angeles County Countywide Siting Element (CSE) below under regional regulations. Oversight of these activities was set up under the charge of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to the California Department of Resources, Recycling, and Recovery (CalRecycle) as of January 1, 2010.

(b) Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on October 11, 1991, required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993.² Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the CalRecycle model ordinance took effect and was to be enforced by the local agency. As further discussed in subsection IV.N.3.2, Environmental Setting, the City passed such an ordinance in 1997 (Recycling Space Allocation, Ordinance No. 171,687).

(c) Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Senate Bill (SB) 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste.³ The legislation requires the CIWMB (now CalRecycle) to complete five items in regards to the diversion of construction and demolition waste: (1) adopt a model ordinance for diverting 50 percent to 75 percent of all construction and demolition debris from landfills; (2) consult with multiple regulators and waste entities (e.g., California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the

² California Public Resources Code, Sections 42900-42911.

³ California Public Resources Code, Section 42912.

model ordinance; (3) compile a report on programs that can be implemented to increase diversion of C&D waste; (4) post a report on the agency’s website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; (5) post on the agency’s website a report for local governments with suggestions on programs to increase diversion of C&D waste. Under SB 1374, jurisdictions must also include in their annual AB 939 report a summary of the progress made in diverting C&D waste. The model ordinance was adopted by CalRecycle on March 16, 2004.⁴

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

AB 341, which took effect on July 1, 2012, amends AB 939 by mandating that jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75 percent reduction in their waste streams. Such business/residential development must: (1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and (2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

(e) *Assembly Bill 1826 – Organic Recycling*

Effective April 1, 2016, AB 1826 requires businesses that generate more than four cy of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses.⁵ Furthermore:

- a. Effective April 1, 2016, all businesses that generate eight cy of organic waste per week shall arrange for organic waste recycling services.
- b. Effective January 1, 2017, all businesses that generate four cy of organic waste per week shall arrange for organic waste recycling services.
- c. Effective January 1, 2019, all businesses that generate four cy or more of commercial solid waste per week shall arrange for organic waste recycling services.
- d. Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cy or more of commercial solid waste per week shall arrange for organic waste recycling services.

⁴ CalRecycle, Senate Bill 1374 (2002), August 24, 2018, <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>. Accessed March 2, 2021.

⁵ California Public Resources Code, Sections 42649.8 et seq.

(f) California Green Building Standards (CALGreen) Code

The most recent update to the California Green Building Standards (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2020. The 2019 CALGreen Code has revised provisions that require new buildings to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.⁶ Local jurisdictions also retain the administrative authority to exceed the CALGreen Code. As described further in Subsection IV.N.3.2, Environmental Setting, under Los Angeles Green Building Code, the City has updated the Los Angeles Green Building Code in compliance with the 2019 CALGreen Code, with the 2020 requirements applicable to projects filed on or after January 1, 2020.⁷

(g) Zero Waste California

Zero Waste California is a state program launched by CalRecycle in 2002 that defines a new hierarchical process for managing solid waste by reducing waste generation at every step in a product chain (i.e., redesigning resource life cycles), starting with manufacturers, so as to minimize environmental and human health impacts from the start rather than primarily relying on public solutions to waste management (i.e., landfills).⁸ The program encourages 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.

(2) Regional*(a) Countywide Integrated Waste Management Plan (CoIWMP)*

Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), including preparation of an Annual Report. The CoIWMP, per AB 939, comprises the counties' and cities' SRRE, an Integrated Waste Management Summary Plan (Summary Plan), and a 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.

⁶ California Building Standards Commission, 2019 California Green Building Standards Code, effective January 1, 2020, <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo>. Accessed March 2, 2021.

⁷ City of Los Angeles Department of Building and Safety, 2020 Green Building Forms & Correction Sheets, <http://www.ladbs.org/forms-publications/forms/green-building/2020-green-building-forms-correction-sheets>. Accessed March 2, 2021.

⁸ California Department of Resources, Recycling, and Recovery (CalRecycle), Zero Waste, <http://www.calrecycle.ca.gov/zerowaste/>. Accessed March 29, 2018.

The County conducts regional planning for the provision of landfill services, including preparing and administering the CoIWMP in response to AB 939. The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2019 Annual Report, published in September 2020, provides disposal analysis and facility capacities for 2019, as well as projections to the CoIWMP's horizon year of 2034.⁹ As stated within the CoIWMP 2019 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.¹⁰ In addition to compliance with state laws that require mandatory commercial recycling and diversion of organics from landfills, in order to maintain adequate disposal capacity, individual jurisdictions within the County must continue to pursue various strategies including: maximizing waste reduction and recycling; studying, promoting, and development alternative technologies; expanding transfer and processing infrastructure; and out-of-County disposal (including waste-by-rail).¹¹

(3) Local

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

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework Element identifies goals, objectives, and policies for utility provision in the City including provision of Solid Waste service.¹² The goals, objectives and policies generally pertain to overall operations of the solid waste management system. Goal 9D provides an overall approach to solid waste management and sets a framework in which individual development projects would operate. Goal 9D calls for "an integrated solid waste management system that maximizes source reduction and materials recovery and minimized the amount of waste requiring disposal."

The General Plan 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 General Plan 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 General Plan 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

⁹ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2019 Annual Report, September 2020.

¹⁰ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 41.

¹¹ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, pages 50 and 51.

¹² City of Los Angeles Department of City Planning, Citywide General Plan Framework: An Element of the City of Los Angeles General Plan. Chapter 9, Infrastructure and Public Services.

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.¹³

(b) *City of Los Angeles Solid Waste Management Policy Plan*

The City's Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management.¹⁴ The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. Pursuant to the requirement of AB 939, the CiSWMPP contains a SRRE to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. The SRRE includes goals and objectives for achieving the diversion rates.

The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.¹⁵ The responsibility for documenting waste diversion efforts for the City of Los Angeles lies with the Bureau of Sanitation (LASAN). As set forth below, more recent plans have been adopted by the City to further its waste reduction and recycling goals.

(c) *Recovering Energy, Natural Resources and Economic Benefit from Waste for L.A.*

The Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan was adopted by the City in 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery.¹⁶ Its purpose is to move Los Angeles away from dependency on landfills for disposal of waste materials and to create renewable green energy ("green collar jobs") by incentivizing local recycling and re-manufacturing industries. The primary objective of RENEW LA is to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The plan calls for obtaining a minimum 90 percent diversion level by 2025 and gives direction to City departments about how to attain the objective.

Under RENEW LA, the City committed to achieving zero waste by diverting 70 percent of the solid waste generated in the City by 2013 and 90 percent by 2025; recycling, and composting efforts; initiating new programs, such as the development of seven

¹³ City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996 and readopted August 8, 2001,

¹⁴ City of Los Angeles Bureau of Sanitation (LASAN), Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015, page 8.

¹⁵ LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwldg_5&_afLoop=10870014375826670#!. Accessed March 2, 2021.

¹⁶ City of Los Angeles, Bureau of Sanitation (LASAN), Fact Sheet: Solid Waste Facilities.

conversion technology facilities, one in each of the City’s “wastesheds”; and converting the LASAN fleet to clean fuel Liquid Natural Gas vehicles.^{17,18}

(d) City of Los Angeles Solid Waste Integrated Resources Plan

LASAN adopted the Solid Waste Integrated Resources Plan (SWIRP) planning process to build on the direction provided by RENEW LA, as well as directives of the Mayor and City Council to achieve 70 percent recycling by 2015 and 90 percent by 2025.¹⁹ The SWIRP planning process began in 2007. The SWIRP, also known as the Zero Waste Plan, was published in October 2013 along with a Notice of Completion for a Draft Program EIR. The SWIRP provides a long-range master plan for the City’s solid waste management needs through 2030. SWIRP identifies the policies, programs, and facilities that will be needed to reach the City’s goal of 90 percent landfill diversion by 2025. The goals of the SWIRP are to eliminate the City’s use of urban landfills, develop alternative technologies for long term waste disposal, and increase recycling and resource recovery and to convert the entire LASAN fleet to clean fuel Liquid Natural Gas vehicles with the ultimate goal of leading Los Angeles towards being a “zero waste” City by 2030.²⁰

(e) Los Angeles Green Building Code (Ordinance No. 181,480)

In April 2008, the City adopted the Green Building Program Ordinance to address the impact on climate change from new development. In 2011, 2014, 2016, and 2019 Chapter IX of the LAMC, referred to as the LA Green Building Code, was amended to incorporate various provisions of the CALGreen Code.^{21,22,23} The LA Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alternations to residential and non-residential buildings. Section 99.04.408.1 of the Green Building Code governs construction waste reduction, disposal, and recycling, and requires construction waste reduction of at least 60 percent, in compliance with LAMC Section 66.32 (the Construction and Demolition [C&D] Waste Recycling Ordinance). Projects filed after January 1, 2020 are required to comply with the 2019 CALGreen Code.

(f) Recycling Space Allocation Ordinance (Ordinance No. 171,687)

The Recycling Space Allocation Ordinance (Ordinance No. 171,687) was adopted on August 13, 1997 to meet the requirements of AB 1327, the California Solid Waste Reuse

¹⁷ LASAN, Fact Sheet: Solid Waste Facilities.

¹⁸ LASAN, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan (SWIRP), October 2013 (adopted April 2015), page ES-I.

¹⁹ LASAN, SWIRP, October 2013 (adopted April 2015).

²⁰ LASAN, SWIRP, Section I, October 2013 (adopted April 2015), page 1.

²¹ City of Los Angeles, Ordinance No. 181,480, approved December 15, 2010.

²² City of Los Angeles, Ordinance No. 182,849, approved December 23, 2013.

²³ City of Los Angeles, Ordinance No. 184,691, approved December 19, 2016.

and Recycling Access Act of 1991.²⁴ Ordinance No. 171,687 establishes requirements for the inclusion of recycling areas or rooms within development projects.

(g) *Construction and Demolition Waste Recycling Ordinance and Waste Hauler Permit*

On March 5, 2010, to comply with SB 1374, the Los Angeles City Council approved Ordinance No. 181,519²⁵ pertaining to a Citywide Construction and Demolition Waste Recycling Ordinance²⁶ that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. In addition, the City initiated a Waste Hauler Permit Program that requires all private waste haulers collecting solid waste within the City, including C&D waste, to obtain AB 939 Compliance Permits prior to collecting, hauling, and transporting C&D waste and to transport C&D waste only to City-certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.²⁷ Additionally, compliance with Ordinance No. 181,519 and the LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including C&D waste, would be recycled.

(h) *City of Los Angeles Curbside Recycling Program*

The City currently operates the largest residential curbside recycling program in the United States, collecting a variety of recyclables from over 750,000 households per week. 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 fully automated collection vehicles in conjunction with 90-gallon blue recycling containers and 90-gallon green yard waste containers, the City currently collects an average of 800 tons per day (tpd) of recyclable materials and 1,700 tpd of green waste from City residents. Participating residents include 530,000 single-family homes and 220,000 small multi-family units. Currently, combining with the multi-family and other City recycling programs, the diversion rate is 76.4 percent.²⁸

(i) *Citywide Exclusive Franchise System for Municipal Waste Collection and Handling (Ordinance No. 182,986)*

Until 2017, the City provided solid waste collection and disposal services primarily to single-family and small multi-family residential land uses (less than four units). In 2013, it was estimated that between 500 and 750 permitted private haulers provided these

²⁴ LASAN, Citywide Construction and Demolition Waste Recycling Ordinance.

²⁵ City of Los Angeles City Clerk, Council File 09-3029.

²⁶ City of Los Angeles, Ordinance No. 181,519.

²⁷ LASAN, Strategic Programs, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-whp?_adf.ctrl-state=1az3pjox07_5&_afLoop=69763588165455#!. Accessed March 2, 2021.

²⁸ LASAN, Blue Bin Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_adf.ctrl-state=1a5hv9g8mo_299&_afLoop=281868155642172#!. Accessed March 2, 2021.

services on the open market for larger multi-family residential, commercial, industrial, and institutional land uses; approximately 45 of these haulers serviced solely commercial uses, and many of the remaining haulers provided C&D waste collection and disposal services. These private haulers were required to obtain City permits to operate within the City limits, but were not otherwise regulated by the City and were contracted privately by individual establishments. The haulers were not obligated to offer recycling, meet diversion requirements, or operate low emission or clean fuel vehicles. This constrained the City's ability to meet its state-mandated solid waste diversion goals, since approximately 70 percent of the City's solid waste disposed of in landfills is generated by larger multi-family residential uses (five units or more) and commercial uses.²⁹

To increase its ability to meet state-mandated solid waste diversion goals, as well as address other environmental and health impacts of the largely unregulated solid waste and collection system for those uses, the City adopted an ordinance in April 2014 (Ordinance 182,986) that implemented an exclusive franchise system for municipal solid waste collection from larger multifamily and commercial land uses. (The ordinance does not apply to the collection and disposal of C&D waste, medical, pharmaceutical, hazardous, or radioactive waste, or certain other types of waste.) As part of this system, known as RecycLA and officially launched in 2017, the City now mandates maximum annual disposal levels and diversion requirements for haulers operating in each of 11 defined City franchise zones. This allows the City to meet and exceed the State's requirements for waste diversion and the provision of mandatory commercial and multifamily recycling. It also allows the City to fulfill a number of other environmental goals, including realizing waste collection route efficiencies and lowering vehicle miles traveled, allowing control over the age and fuel efficiency of fleet vehicles, and enabling improved health and safety conditions for workers.³⁰

b) Existing Conditions

(1) Project Site Solid Waste Generation

The Project Site is currently developed with existing one- and four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking. The existing warehouses total approximately 205,393 square feet and employs 218 people. As indicated in **Table IV.N.3-1, *Estimated Existing Solid Waste Generation at the Project Site***, the existing on-site uses currently generate an estimated 390 tons per year of Class III solid waste. This number does not take into account the amount of solid waste diverted as the result of required compliance with source reduction and recycling programs. The CoIWMP assumes an ongoing diversion rate of 65 percent

²⁹ LASAN, Draft Program EIR for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Process, February 26, 2013.

³⁰ County of Los Angeles Department of Public Works, LASAN, RecycLA.

Countywide.³¹ With diversion, the existing on-site uses would generate 137 tons of Class III solid waste for disposal in the landfills.

**TABLE IV.N.3-1
ESTIMATED EXISTING SOLID WASTE GENERATION AT THE PROJECT SITE**

Land Use	Quantity ^a	Generation Factor ^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Freezer/Cooler	161,854 sf	1.79 tons/emp/year	390	2,138
Dry Storage	32,382 sf			
Offices	11,157 sf			
Total (Pre-Diversion)	205,393 sf (218 emp)		390	2,138
Total Post-Diversion)^c			137	748

NOTE(S):

lbs = pounds; sf = square feet; emp = employee

^a As stated in Section IV.J, *Population and Housing*, of this Draft EIR, existing uses on the Project Site employ approximately 218 people.

^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates>. Accessed November 1, 2021.

^c Based on an anticipated diversion rate of 65 percent for operations.

SOURCE: ESA, 2021.

(2) City of Los Angeles Solid Waste Generation and Collection

Solid waste management in the City involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN is responsible for developing strategies to manage solid waste collection and disposal in the City. LASAN primarily collects solid waste generated by single-family dwellings, most small multi-family dwellings usually consisting of four units or fewer, and public facilities. Private hauling companies contracted with the City primarily collect solid waste generated by larger multi-family residential, commercial, and industrial properties.

(3) City of Los Angeles Solid Waste Disposal

The City does not own or operate any landfills; the majority of solid waste generated in the City is disposed of at County landfills. Per the CoIWMP 2019 Annual Report, while the economy has continued to grow in recent years, the amount of waste that residents

³¹ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2019 Annual Report, September 2020, page 38.

and businesses generated and disposed of in the County remained relatively low.³² The ColWMP 2019 Annual Report shows a downward disposal trend from 2007 to 2010 and a plateau at 2010 levels between 2011 through 2014, with an increase from 2014 to 2018 and another slight plateau from 2018 to the present.³³ In 2019, the most recent year for which reported data is available, the County disposed of approximately 11 million tons of materials, compared to approximately 11.5 million tons in 2007, resulting in an overall reduction of approximately 500,000 tons of solid waste. Based on these reductions, the ColWMP assumes an ongoing diversion rate of 65 percent Countywide.³⁴ The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's AB 341 75 percent recycling goal. The 2019 average daily disposal for in-county landfills was 16,756 tpd and the maximum daily capacity was 42,297 tpd.³⁵

The ColWMP 2019 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2034 through scenarios that include a combination of all or some of the following: (1) maximize waste reduction and recycling; (2) expand existing landfills; (3) study, promote, and develop alternative technologies; (4) expand transfer and processing infrastructure; and (5) out-of-county disposal (including waste-by-rail).³⁶

(a) *Class III Landfills*

Class III landfills accept non-hazardous municipal solid waste. There are 10 Class III landfills in the County, which collectively accept the majority of solid waste generated in the County (approximately 5,227,982 tons in 2019), followed by exports to out-of-County landfills in Orange, Riverside, San Bernardino, Ventura, and Kern Counties (4,969,741 tons in 2019) and transformation facilities (336,707 tons in 2019).³⁷ The remaining disposal capacity for the County's Class III landfills is estimated at approximately 148.40 million tons as of December 31, 2019.³⁸

Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of non-hazardous solid waste disposal materials (i.e., Class III waste materials). The maximum daily capacity for the landfill is approximately 12,100 tpd, and the 2019

³² County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, page 5.

³³ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, page 5, Figure 1, Disposal Trend.

³⁴ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, page 38.

³⁵ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

³⁶ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, pages 50 and 51.

³⁷ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, page 26.

³⁸ County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, September 2020, page 32.

average daily disposal was approximately 6,919 tpd. As of December 31, 2019 Sunshine Canyon landfill had a remaining capacity of approximately 55.16 million tons and a remaining life expectancy of approximately 18 years.³⁹

(b) *Unclassified Landfills*

Unclassified landfills accept C&D waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2019, the amount of inert waste materials disposed Countywide was 266,452 tons.⁴⁰

As of 2019, there is only one permitted Inert Waste Landfill in Los Angeles County that has a full solid waste facility permit, which is the Azusa Land Reclamation Landfill.⁴¹ The remaining capacity of this landfill is estimated at 47.07 million cubic yards (58.84 million tons) with a projected closure date of 2046.⁴²

In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, collectively processing approximately 3.35 million tons in 2019.⁴³

(4) **City of Los Angeles Waste Diversion and Recycling Efforts**

As described in the Regulatory Framework, under SB 1374, AB 939, and AB 341, all cities and counties in the State are currently required to divert 75 percent of their solid waste streams from landfills.⁴⁴ The County and multiple cities in the County (including the City of Los Angeles) have achieved the 50 percent goal, with the County diversion rate currently at 65 percent.

In 2001, the City adopted a 70 percent diversion rate goal by 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new “zero waste-to-landfill” goal (zero waste) by the year 2025. The City had a diversion rate of 20.6 percent in 1990, 46 percent in 1995, 65.2 percent in 2000, and 67.1 percent by year 2005. By the end of 2011, the City achieved a diversion rate of 76.4 percent.⁴⁵ In 2011, the last reported year available, the City generated nearly

³⁹ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

⁴⁰ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 25.

⁴¹ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

⁴² County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

⁴³ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

⁴⁴ California Public Resources Code, Sections 41730 et seq.

⁴⁵ City of Los Angeles, Zero Waste Progress Report, March 2013, page 7.

16 million tons of potential solid waste.⁴⁶ Of this total, the City diverted approximately 12.2 million tons (76.4 percent) from disposal into landfills.⁴⁷

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a 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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate solid waste impacts include:

- Amount of project 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.
- Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, the CiSWMPP, 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 SRRE.

b) Methodology

The analysis of impacts on solid waste disposal addresses the amount of solid waste that would be generated by the Project and Project with the Deck Concept and whether sufficient landfill capacity is available to receive that solid waste. The amount of solid waste to be generated by the Project is estimated by applying the Thresholds Guide's solid waste generation factors to the proposed land uses and identifying the increase in solid waste generation at the Project Site under the Project and Project with the Deck

⁴⁶ 4.2 pounds per person per day x 3,806,411 persons = 15,986,926 tons of potential solid waste based on data from the City of Los Angeles Zero Waste Progress Report, March 2013, page 8.

⁴⁷ Diversion statistic based on data in generation data included in the City of Los Angeles, Zero Waste Progress Report, March 2013. Generation for 2011 (15,986,926 tons of potential solid waste) x 2011 diversion rate (76.4 percent) totals approximately 12.2 million tons of diverted waste materials.

Concept, taking the prevailing diversion rate into account. The analysis below includes calculations for the generated solid waste both pre- and post-diversion. The availability of existing landfill capacity to accommodate this increase in solid waste is based on the existing and projected future remaining landfill capacity identified for County landfills in the ColWMP 2019 Annual Report.

The analysis also addresses the Project's consistency with policies and programs to increase diversion of solid waste from landfills and increase the recycling of materials in support of sustainability. Applicable policies and programs are summarized, and their goals and standards are noted. The Project's characteristics are reviewed for consistency with those goals and standards.

c) Project Design Features

No specific Project Design Features are proposed with regard to solid waste.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

Project construction would include the demolition of approximately 205,393 gross square feet of existing buildings and approximately 173,000 square feet of existing hardscape consisting of concrete, asphalt, and soil; the export of approximately 531,319 cy of excavated soil (associated with excavation for new building foundations and subterranean parking); and new construction totaling approximately 1,792,103 square feet. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's inert landfill site, Azusa Land Reclamation, or one of a number of inert debris engineered fill operations that are located throughout the County. Although unlikely, the Project construction-related C&D waste could be exported to out-of-county jurisdictions.

Table IV.N.3-2, *Estimated C&D Waste Generation*, provides an estimate of the amount of C&D debris that would be generated during Project construction.

**TABLE IV.N.3-2
ESTIMATED C&D SOLID WASTE GENERATION**

Debris Type	Quantity	Generation Factor^a	Waste Generation (tons)
Site Preparation			
Building Demolition Material	205,393 sf (5,071 cy)	400 lbs/cy	1,014
Hardscape Demolition:			
Concrete	26,000 sf (641.98 cy)	2,400 lbs/cy	770
Asphalt	60,500 sf (1,493.83 cy)	2,400 lbs/cy	1,793
Soil	86,500 sf (4,246.91 cy)	3,000 lbs/cy	6,407
Exported Soil	531,319 cy	3,000 lbs/cy	796,979
<i>Site Preparation Subtotal</i>	—	—	806,963
Building Construction			
Total New Building Area	1,792,103 sf (44,249 cy)	400 lbs/cy	8,850
Total (pre-diversion)			815,813
Total (post-diversion)			203,953

NOTE(S):

sf = square feet; cy = cubic yards

^a Generation factors are provided by CalRecycle's Solid Waste Cleanup Program Weights and Volumes for Project Estimates, <https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/>. Accessed July 16, 2021.

SOURCE: ESA, 2021.

As shown in Table IV.N.3-2, Project C&D activities would generate an estimated 815,813 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City's Green Building Code (e.g., use of recyclables in building construction, etc.).

As required by City Ordinance No. 181,519 (Waste Hauler Permit Program), Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The inert solid waste and soil would require disposal at the County's only operating inert landfill, Azusa Land Reclamation, or at any of a number of state-permitted Inert Debris Engineered Fill Operations in the County, such as the Arcadia Reclamation Facility. This does not include any asbestos-containing materials (ACMs), lead-based paints (LBPs), polychlorinated biphenyl (PCB), contaminated soil, or other contaminated waste of which would be disposed at facilities licensed to accept such waste. For further discussion of contaminated soil and waste, see Section IV.F, *Hazards and Hazardous Materials*, of this Draft EIR.

In compliance with the requirements of SB 1374 and Waste Hauler Permit Program, the Applicant would implement a construction waste management plan to recycle and/or

salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Assuming the required C&D diversion rate of 75 percent per SB 1341 and Waste Hauler Permit Program, the Project is estimated to generate a total of approximately 203,953 tons of C&D waste. Additionally, the Project's construction contractor would deliver all C&D waste generated by the Project to a certified C&D Waste Processing Facility in accordance with AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Pursuant to the Waste Hauler Permit Program, all C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 47.07 million cubic yards (58.84 million tons),⁴⁸ the Project's estimated total solid waste disposal needed during construction after 75 percent diversion represents approximately 0.43 percent of the estimated remaining capacity at the Azusa Facility. This is a conservative estimate as it does not take into account the additional capacity provided by inert debris engineered fill operations or the potential for reuse rather than disposal of the exported soil component of the Project's C&D 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, and impacts would be less than significant.

(b) Operational Impacts

Estimated solid waste generation for Project operation is shown in **Table IV.N.3-3, *Estimated Operational Solid Waste Generation***. As indicated therein, it is estimated that the Project would generate a net increase over and above existing conditions of approximately 9,627 tons of solid waste per year. This estimate does not take into account the amount of solid waste that would be diverted via source reduction and recycling programs within the City. Countywide, the CoIWMP assumes an ongoing diversion rate of 65 percent.⁴⁹ Therefore, assuming a diversion rate of 65 percent, Project operation would generate a net increase of 3,369 tons of solid waste requiring landfill disposal per year.

⁴⁸ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

⁴⁹ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 38.

**TABLE IV.N.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	308 units	0.87 tons/unit/year	268	1,468
Commercial ^c	331,495 sf (846 emp)	1.96 tons/emp/year	1,658	9,086
Office	994,005 sf (3,777 emp)	2.02 tons/emp/year	7,630	41,806
Hotel	236 rooms (118 emp)	1.76 tons/emp/year	208	1,138
Proposed Subtotal^d	—	—	9,763	53,498
<i>Existing Uses^e</i>	<i>205,393 sf (218 emp)</i>		<i>(137)</i>	<i>(748)</i>
Net Increase (pre-diversion)	—	—	9,627	52,749
Net Increase (post-diversion)^f	—	—	3,369	18,462

NOTE(S):

lb = pounds; sf = square feet; emp = employees

^a Number of employees per use are detailed in Section IV.J, *Population and Housing*, of this Draft EIR.^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup/rates>. Accessed November 1, 2021.^c Commercial uses include the gym, restaurants, retail, and studio/event/gallery/museum uses.^d Totals may not add up due to rounding.^e Existing subtotal is taken from Table IV.N.3-1. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.^f Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2019 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2021.

The Project's estimated annual pre-diversion solid waste generation of 9,763 tons requiring landfill disposal represents approximately 0.09 percent of the County's 2019 annual waste generation of 10,969,522 tons per year and approximately 0.01 percent of the remaining 148.4-million-ton capacity in 2019 in the County's Class III landfills. With diversion, the Project's annual solid waste generation that requires landfill disposal would represent approximately 0.03 percent of the County's annual waste generation and approximately 0.002 percent of the remaining capacity in 2019.

The County expects that approximately 84,455,686 additional tons of the remaining 148.40-million-ton capacity would be used in 2026, the earliest anticipated year of Project

buildout.^{50,51} This would leave an available capacity of 63,944,314 tons in 2026, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project's estimated annual pre-diversion solid waste generation would represent approximately 0.02 percent of the remaining capacity in 2026. The Project's annual solid waste generation requiring landfill disposal, with diversion, would represent approximately 0.01 percent of the remaining capacity in 2026.

As previously stated in Subsection 2.b, *Existing Conditions*, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the City. The maximum daily capacity for this landfill is 12,100 tpd, and the 2019 disposal rate was 6,919 tpd, indicating a remaining daily capacity of 5,181 tpd of capacity. If all of the Project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's net addition of 30.86 tpd⁵² would represent 0.6 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65 percent rate, this percentage would drop to approximately 0.2 percent.

The various event programming proposed under the Project would be temporary and would not occur every day and throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project.

As described in the CoIWMP 2019 Annual Report, future disposal needs over the next 15-year planning horizon (2034) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. Upon buildout, the Project would require the addition of a solid waste collection route for weekly service by LASAN (i.e., private haulers under contract to LASAN), and would be required to provide a minimum of two months' advance notice to LASAN to allow for integration into the weekly collection schedule. The Project would not require the expansion or construction of a new solid waste disposal or

⁵⁰ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

⁵¹ The Project could be completed as early as 2026 or as late as 2040. The CoIWMP 2019 Annual Report does not include projections out to 2040. Projections based on the current data provided in the CoIWMP 2019 Annual Report would be speculative due to the potential for (1) additional disposal facilities brought online; (2) additional facilities being expanded to increase capacity; (3) the reduction in solid waste generated and disposed due to regulations; and (4) future use of out-of-county landfills.

⁵² The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal is calculated by 9,627 net tons / 312 days = 30.86 net tons per day.

recycling facility to handle Project-generated waste because the existing facilities have enough capacity to receive the Project's waste.

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

Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. 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, and impacts would be less than significant.

(c) *Project with the Deck Concept*

As stated in Chapter II, *Project Description*, of this Draft EIR, the Applicant seeks to construct a 132,000-square foot Deck that extends over a portion of the off-site Railway Properties east of the Project Site. Construction of the Project with the Deck Concept would include the same demolition amount needed for the Project, approximately 1,792,103 square feet of new building floor area, and a 132,000-square foot Deck.⁵³ **Table IV.N.3-4, *Estimated C&D Waste Generation for the Project with the Deck Concept***, provides an estimate of the amount of C&D debris that would be generated during Project with the Deck Concept construction.

As shown in Table IV.N.3-4, Project with the Deck Concept, C&D activities would generate an estimated 816,465 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City's Green Building Code (e.g., use of recyclables in building construction, etc.). Assuming the required C&D diversion rate of 75 percent per SB 1341 and Waste Hauler Permit Program, the Project with the Deck Concept is estimated to generate a total of approximately 204,116 tons of C&D waste. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 47.07 million cubic yards (58.84 million tons),⁵⁴ the Project with the Deck Concept's estimated total solid waste disposal needed during construction after 75 percent diversion represents approximately 0.43 percent of the estimated remaining capacity at the Azusa Facility. This is a conservative estimate as it does not take into account the additional capacity provided by inert debris engineered fill operations or the potential for reuse rather than disposal of the exported soil component of the Project's C&D waste.

⁵³ While the construction of the Deck itself would include additional excavation, the amount of excavation specific to the Deck would be within the overall excavation estimate of 531,319 cy estimated for the Project.

⁵⁴ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.

**TABLE IV.N.3-4
ESTIMATED C&D SOLID WASTE GENERATION FOR THE PROJECT WITH THE DECK CONCEPT**

Debris Type	Quantity	Generation Factor ^a	Waste Generation (tons)
Site Preparation			
Building Demolition Material	205,393 sf (5,071 cy)	400 lbs/cy	1,014
Hardscape Demolition:			
Concrete	26,000 sf (641.98 cy)	2,400 lbs/cy	770
Asphalt	60,500 sf (1,493.83 cy)	2,400 lbs/cy	1,793
Soil	86,500 sf (4,246.91 cy)	3,000 lbs/cy	6,407
Exported Soil	531,319 cy	3,000 lbs/cy	796,979
<i>Site Preparation Subtotal</i>	—	—	806,963
Building Construction			
Total New Building Area	1,792,103 sf (44,249 cy)	400 lbs/cy	8,850
Construction of the Deck	132,000 sf (652 cy)	400 lbs/cy	652
Total (pre-diversion)			816,465
Total (post-diversion)			204,116

NOTE(S):

sf = square feet; cy = cubic yards

^a Generation factors provided by CalRecycle's Solid Waste Cleanup Program Weights and Volumes for Project Estimates, <https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/>. Accessed July 16, 2021.

SOURCE: ESA, 2021.

Based on the above, Project with the Deck Concept 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, and impacts would be less than significant.

Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. While additional event programming would be proposed under the Project with the Deck Concept, these events would be temporary and would not occur every day and throughout the day. Therefore, it is likely that the solid waste generated during these particular events would not be more than the current remaining capacities at the landfills, and the additional solid waste generated by the Project's temporary events would be less than what is generated by the residential and commercial components of the Project with the Deck Concept. Thus, the conclusions regarding impact significance presented above under the Project would be the same and apply to operation of the Project with the Deck Concept. **As such, Project with the Deck Concept 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, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding 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.

(3) Level of Significance After Mitigation

Impacts regarding 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 comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

(1) Impact Analysis

(a) Construction Impacts

The Project would comply with applicable statutes and regulations related to solid waste, including those pertaining to waste reduction and recycling. During construction, the Project would provide recycling containers on-site in accordance with City’s Recycling Space Allocation Ordinance. Additionally, the Project construction contractor would deliver all C&D waste generated by the Project to a certified Construction and Demolition Waste Processing Facility in accordance with AB 939 Compliance Permit requirements. Thus, the Project would promote source reduction and recycling, consistent with the applicable federal, state, and local statutes and regulations related to solid waste. **Therefore, Project construction would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

(b) Operational Impacts

During Project operation, in accordance with the City’s Recycling Space Allocation Ordinance, which requires that all new development projects provide an adequate recycling area or room for collecting and loading recyclable materials, the Project would provide on-site recycling collection facilities for the Project’s occupants within the same area as the other “back-of-house” services for the Project Site. The City has taken an aggressive stance on diverting solid waste from landfills, achieving 76.4 percent reduction in landfill deposited in 2011 with a goal of zero waste by 2025 through the implementation of programs with which the Project will comply.⁵⁵ **Therefore, the Project would comply**

⁵⁵ LASAN, Zero Waste Progress Report, page 7.

with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

(c) Project with the Deck Concept

Construction of the Project with the Deck Concept would similarly be required to comply with the applicable statutes and regulations related to solid waste, including those pertaining to waste reduction and recycling. As with the Project, the Project with the Deck Concept would promote source reduction and recycling. **Therefore, similar to the Project, construction of the Project with the Deck Concept would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

Operation of the Project with the Deck Concept would include the same uses on the Project Site as under the Project and would not create additional uses or occupied floor area. As with the Project, the Project with the Deck Concept would provide on-site recycling collection facilities on the Project Site and on the Deck. **Therefore, like the Project, operation of the Project with the Deck Concept would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding 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.

(3) Level of Significance After Mitigation

Impacts regarding solid waste services 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

Solid waste disposal in California is a regional issue administered by regional agencies, and for the Project, is administered by the County. As discussed in Subsection 2.a, *Regulatory Framework*, the State requires that the Siting Element, required as part of a jurisdiction's comprehensive solid waste management program, show the provision of a minimum of 15 years of combined disposal capacity through existing or planned solid waste disposal and transformation facilities, or through additional strategies. Projected growth is included in the analysis and the required Annual Report updates the disposal demand and supply each year for the following 15-year period. The CoIWMP 2019 Annual Report anticipates an approximately 9.3 percent increase in population growth within the

County of Los Angeles by 2034 and an increase of 13.6 percent in employment.⁵⁶ The cumulative development in the Project area would contribute an increment of the overall projected demand for waste disposal. Chapter III, *Environmental Setting*, of this Draft EIR, identifies 141 related projects, all of which would contribute waste to County landfills and to the demand for solid waste disposal during construction and operation.

(a) *Construction Impacts*

Similar to the Project, the related projects within the City would generate C&D waste and be subject to the Citywide Construction and Demolition Waste Recycling Ordinance and the Waste Hauler Permit Program, wherein the construction and demolition waste would be recycled to the extent feasible. The C&D waste resulting from construction activities for the related projects is unknown and unquantifiable as each related project would result in differing amounts of demolition and soil excavation. The C&D waste would be disposed of at the County's Azusa Land Reclamation Landfill or one of the inert debris engineered fill operations located in the County. As indicated above, the remaining capacity of the Azusa Land Reclamation Landfill is estimated at 47.07 million cubic yards (58.84 million tons). Additional capacity would also be provided by inert debris engineered fill operations or the potential for reuse rather than disposal of exported soil. Given this available future capacity, it is expected that all C&D waste can be accommodated during that time, and cumulative impacts regarding the disposal of C&D waste would not occur.

Additionally, as required by City Ordinance No. 181,519 (Waste Hauler Permit Program), construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The related projects would also be required to comply with SB 1374 and City Ordinance No. 181,519, which requires the related projects to implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. The related projects' respective construction contractors would deliver all C&D waste generated by those projects to a certified C&D Waste Processing Facility in accordance AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Moreover, the CoIWMP 2019 Annual Report concludes that there is adequate capacity in permitted solid waste facilities to serve the County through the 15-year planning period of 2019 through 2045.⁵⁷ **For these reasons, the Project and related projects 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. As such, cumulative impacts would be less than significant.**

⁵⁶ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

⁵⁷ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 6.

(b) Operational Impacts

As shown in **Table IV.N.3-5, Estimated Cumulative Operational Solid Waste Generation**, the estimated solid waste requiring landfill disposal for all 141 related projects, not accounting for diversion and recycling, would be 179,538 tons per year or 983,771 pounds per day. The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be 189,165 tons per year or 1,036,520 pounds per day. Again, these estimates do not take into account the amount of solid waste that would be diverted via source reduction and recycling programs, assumed by the County to be approximately 65 percent.

**TABLE IV.N.3-5
ESTIMATED CUMULATIVE OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity ^a	Daily Generation Factor ^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Residential	40,289 units	0.87 tons/du/year	35,051	192,063
Retail/Restaurant ^c	5,819 ksf (13,387 emp)	1.96 tons/emp/year	26,239	143,773
Hotel	3,643 rooms (1,822 emp)	1.76 tons/emp/year	3,207	17,571
Office	13,456 ksf (53,851 emp)	2.02 tons/emp/year	108,779	596,049
Schools ^d	3,276 students (767 emp)	0.45 tons/emp/year	345	1,891
Assisted Living	55 beds (55 emp)	0.63 tons/emp/year	35	1,891
Other Services ^e	3,225 ksf (5,397 emp)	1.09 tons/emp/year	5,883	32,234
Cumulative Subtotal (without Project)^f			179,538	983,771
<i>Project (net increase)^g</i>			<i>9,627</i>	<i>52,749</i>
Cumulative Total (with Project)			189,165	1,036,520

NOTE(S):

lb = pounds; ksf = thousand square feet; sf = square feet; emp = employees

^a Number of employees per use, as applicable, are detailed in Section IV.J, *Population and Housing*, of this Draft EIR.

^b Generation factors provided by are CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed November 1, 2021.

^c Retail/Restaurant uses include retail, restaurant, commercial, bar, grocery store/supermarket, pharmacy, cinema, and health club uses.

^d Schools include daycares, universities, and art school uses.

^e "Other Services" includes various uses that do not have specific generation rates, such as Other, Bus Facility, Art Space, Storage, Event Space, Sports Complex, Museum, Industrial Park, Production Space, Library, Event Facility, Warehouse, Industrial, Manufacturing, Jail, and Park uses.

^f Totals may not add up precisely due to rounding.

^g Project amount is taken from Table IV.N.3-3 of this section.

SOURCE: ESA, 2021.

As the County's Class III landfills serve the entire County of Los Angeles, the Project plus the 141 related projects would represent only a small portion of the overall regional service area.

The solid waste generation by the Project and related projects represents only a fraction of the available capacity that could be accommodated at the landfills serving them. The cumulative annual solid waste generation, without accounting for diversion, would be a negligible increment of the County's annual waste generation of 10,969,522 tons per year (1.7 percent) and remaining 148.40-million-ton capacity in the County's Class III landfills (0.13 percent). Accordingly, the cumulative contributions of the Project plus the related projects would not approach, much less exceed, the available capacity of existing facilities.

As noted above, the CoIWMP 2019 Annual Report indicates that in-County and out-of-County facilities would adequately meet future disposal needs over the next 15-year planning horizon (2034) through a number of strategies that would be carried out during that period. Through planning horizon year 2034, the County expects total solid waste generation Countywide to total approximately 178,586,726 tons, which accounts for the 65 percent diversion.⁵⁸

The approximately 189,165 tons of solid waste estimated to be generated by the Project and 141 related projects (pre-diversion) would account for approximately 0.14 percent of the County's expected total solid waste generation through 2034. Assuming a diversion rate of 65 percent, the Project and 141 related projects would generate approximately 66,208 tons⁵⁹ requiring disposal, which would account for approximately 0.05 percent of the County's expected total solid waste generation through 2034. Therefore, solid waste generation by the Project and 141 related projects would leave available capacity in 2034 to serve the County.

As discussed above, Project-level impacts related to solid waste disposal would be less than significant. The CoIWMP accounts for cumulative waste generation for the 15-year planning period ending in 2034, as the analysis includes projected growth. Therefore, cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity. **The Project and related projects 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. As such, cumulative impacts on solid waste would be less than significant.**

(c) *Consistency with Applicable Regulations*

Similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction, recycling, and diversion. Compliance with mandated waste reduction and diversion requirements would be required for each related project on a project-by-project basis at the time of plan submittal to their respective jurisdictions and would be reviewed pursuant to their respective City or County's Green Building Code, as applicable. Each project and jurisdiction would be required to comply with State and County regulations governing solid waste and, as such, would be obligated to implement source reduction, reuse, and recycling in compliance with these

⁵⁸ County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

⁵⁹ $189,165 \times 0.35 = 66,208$

regulations. As documented in the 2019 CoIWMP Annual Report, the trend in solid waste disposal between 2005 and 2010 was consistently downward, plateaued between 2010 and 2014, and has increased only gradually since 2014 despite considerable economic growth in the region. Nonetheless, there has been an overall reduction between 2007 and 2019 due to the reduction in waste disposal at in-county facilities, potentially due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's 75 percent recycling goal. Overall disposal volumes therefore remain relatively low as the result of compliance with increasingly stringent state, county, and local diversion goals, a trend that is expected to continue as more stringent waste diversion requirements and other strategies and technologies that promote alternatives to disposal are implemented. **Therefore, the Project and related projects would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste, and cumulative impacts would be less than significant.**

(d) *Project with the Deck Concept*

Cumulative impacts associated with the generation of solid waste during construction would be the same under the Project with the Deck Concept as with the Project. While construction of the Deck would increase the amount of C&D waste generated under the Project with the Deck Concept, the C&D waste would be accommodated by the permitted solid waste facilities in the County. Therefore, similar to the Project, the Project with the Deck Concept and related projects 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, cumulative impacts related to solid waste during construction would be less than significant.

Cumulative impacts associated with the generation of solid waste during operation would be the same under the Project with the Deck Concept as with the Project since it would not include additional uses that are not already accounted for under the Project. Thus, the conclusions regarding cumulative impact significance presented above are the same and apply to the Project with the Deck Concept. **As such, cumulative impacts associated with solid waste under the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding 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.

(3) Level of Significance After Mitigation

Cumulative impacts with regard 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.