IV. -Environmental Impact Analysis

M.3 Utilities and Service Systems - Solid Waste

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on solid waste facilities. The analysis describes existing solid waste facilities and their associated capacities, estimates the amount of solid waste that would be generated during construction and operation of the Project, and evaluates whether existing and planned solid waste facilities could accommodate the estimated solid waste generated by the Project. An assessment of the Project's consistency with applicable solid waste regulations and its potential to impair solid waste reduction goals is also included. This analysis is based in part on the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2019 Annual Report prepared by the County of Los Angeles Department of Public Works in September 2020.

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 (Organic Recycling)
- Zero Waste California
- California Green Building Standards
- Assembly Bill 341 (California's 75-Percent "Recycling" Goal, the County of Los Angeles Countywide Integrated Waste Management Plan 2017)
- City of Los Angeles General Plan Framework Element
- City of Los Angeles Solid Waste Integrated Resources Plan (Zero Waste Plan)
- RENEW LA Plan
- City of Los Angeles Recycling Space Allocation Ordinance
- Citywide Construction and Demolition Waste Recycling Ordinance
- Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System

- The City of Los Angeles Green Building Ordinance

(1) State

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

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

(b) Assembly Bill 1327

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

(c) Senate Bill 1374

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

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[1] *California Public Resources Code Section 41821.*
[2] *CalRecycle, Senate Bill 1374 (2002), August 24, 2018.*

(d) Assembly Bill 1826

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

(e) Zero Waste California

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

(f) California Green Building Standards

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

[3] *CalRecycle, Mandatory Commercial Organics Recycling, https://www.calrecycle.ca.gov/recycle/commercial/organics/, accessed March 2021.*

[4] *Building Standards Commission, CALGreen, https://www.dgs.ca.gov/BSC/Codes, Accessed March 2021.*

(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.

(2) Regional

(a) Countywide Integrated Waste Management Plan

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

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2019 Annual Report, published in September 2020, provides disposal analysis and facility capacities for 2019, as well as projections to the CoIWMP's horizon year of 2034.[6] As stated within the CoIWMP 2019 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[7] A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2034.[8]

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

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

[7] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, 2020, page 43.*

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

(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 adequate infrastructure in the future. The Framework Element supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[9] The Framework Element addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program and composting). Furthermore, the Framework Element states that for these programs to succeed, the City should locate businesses where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The Framework Element indicates that more transfer facilities will be needed to dispose of waste at remote landfill facilities due to the continuing need for solid waste transfer and disposal facilities, as well as the limited disposal capacity of the landfills in Los Angeles. Several landfill disposal facilities accessible by truck and waste-by-rail landfill disposal facilities that could be used by the City are identified to meet its disposal needs.[10]

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

LA Sanitation and Environment (LASAN) developed the Solid Waste Integrated Resources Plan (SWIRP) also known as the "Zero Waste Plan," a 20-year master plan to reduce solid waste, increase recycling, and manage trash in the City through the year 2030.[11] This plan encompasses on-going solutions and programs (i.e., blue and green bin recycling, multi-family recycling, restaurant food scrap diversion, alternative technologies, hazardous waste recycling, Los Angeles Unified School District recycling program, etc.), as well as new programs to be implemented during the planning horizon. In addition, the SWIRP is the result of a mayoral directive that is in line with the City Council's RENEW LA plan, as discussed further below.[12] In May 2008, the stakeholders of the Zero Waste Plan adopted the Solid Waste Integrated Resources Plan guiding principles to help the City achieve its zero waste goals by 2030.[13] The Solid Waste Integrated Resources Plan is intended to provide a long-term outline of the policies, programs, infrastructure, regulations, incentives, new green jobs,[14] technology, and financial strategies necessary to achieve 90-percent diversion of solid waste by 2025.[15] The term "zero

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9 *City of Los Angeles Department of City Planning, Citywide General Plan Framework, 2001, p. 9-11.*
10 *City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9.*
11 *LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan, 2013.*
12 *LASanitation, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.*
13 *City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.*
14 *"Green jobs" is the term for work force opportunities created by companies and organizations whose mission is to improve environmental quality.*
15 *LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan (SWIRP), 2013.*

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

(c) RENEW LA Plan

RENEW LA was adopted by the City Council in March 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery.[17] This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent by 2025.[18] The plan focuses on combining key elements of existing reduction and recycling programs and infrastructure with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, and renewable fuels, chemicals, and energy. The RENEW LA Plan also calls for reductions in the quantity of residual materials disposed in landfills and their associated environmental impacts.

(d) City of Los Angeles Space Allocation Ordinance

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

(e) Citywide Construction and Demolition Debris Recycling Ordinance

On March 5, 2010, the City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) that requires LASAN to ensure that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor. The policy became effective in January 2011.[19] These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70 percent reclamation standard.[20] Additionally, compliance with the Ordinance and LAMC Section 66.32, which requires the haulers

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[16] *LASanitation, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r, Accessed March 2021.*

[17] *Los Angeles Municipal Code, City Ordinance 184665.*

[18] *Los Angeles Municipal Code, City Ordinance 184665.*

[19] *LASanitation Website, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr, Accessed March 2021.*

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,[21] nearly three million tons of solid waste from the City are still disposed in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.[22]

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

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[21] *City of Los Angeles Bureau of Sanitation, Zero Waste Progress Report, https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf, Accessed March 2021.*

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

[23] *LASanitation Website, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr, Accessed March 2021.*

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

(1) Project Site Solid Waste Generation

The Project Site is located within the South Park subarea of the Central City Community Plan Area, which is bounded by Figueroa Street and the Harbor Freeway to the west, Main Street to the east, 8th Street to the north, and the Santa Monica Freeway to the south. The Project Site is approximately 56,325 square feet (1.29 acres) and is currently occupied by multiple commercial buildings and a four-story residential hotel building. The Project fronts both West Pico Boulevard and South Hope Street. As shown in **Table IV.M.3-1, Existing Average Daily Solid Waste Generation**, existing uses generate 927 pounds of solid waste per day.

Table IV.M.3-1
Existing Average Daily Solid Waste Generation

Land Use	Size (square feet)	Employees [a]	Generation Rate [b] (pounds/day)	Total Generation (pounds/day)
Commercial	32,550	88	10.53/emp	927
Hotel [c]	46,626	--	--	--
			Existing Solid Waste Generation	**927**

Notes: emp= employee
*a See **Section IV.I, Population and Housing,** of this Draft EIR. Employee generation rate source: School Works, Inc., 2018 Developer Fee Justification Study, Los Angeles Unified School District, March 2018, Table 14, page 19.*
b Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used).
c Because the existing 111 SRO-units within the Morrison Hotel have been vacant since at least 2006, it does not currently generate solid waste.
Source (table): EcoTierra Consulting, 2020.

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

Within the City, solid waste management 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 primarily collects solid waste generated by single-family dwellings, small multi-family dwellings of four units or fewer, and public facilities, including the City Hall complex, some public buildings, parks, and fire stations. LASAN collects over one million tons of refuse annually from 750,000 customers, averaging 6,652 tons per day.[24] Large multi-family residences, such as apartment complexes and condominiums, and commercial and industrial

[24] *Los Angeles Bureau of Sanitation, Solid Resources Website, accessed July 2019.*

buildings, contract with a private company to collect and transport their materials for disposal or recycling.[25]

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

In 2019, the most recent year for which reported data is available, the County disposed of approximately 10.5 million tons of materials, compared to approximately 11.5 million tons in 2007, resulting in an overall reduction of approximately 1 million tons of solid waste.[26] 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 75 percent recycling goal pursuant to AB 341. For the purpose of long-term disposal capacity planning, a Countywide diversion rate of 65 percent was assumed for 2019. Based on a total disposal of approximately 10.5 million tons (excluding inert waste and imports) and the 65 percent diversion rate, the County generated approximately 30.1 million tons of waste.[27] The 2019 average daily disposal for in-County landfills was 16,756 tons per day (tpd) and the maximum daily capacity was 42,297 tpd.[28]

(i) 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), followed by exports to out-of-County landfills in Orange, Riverside, San Bernardino, Ventura, and Kern Counties (4,969,741 tons) and transformation

[25] *Los Angeles Department of City Planning, L.A. CEQA Thresholds Guide, September 2006, page M.3-1.*

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

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

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

facilities (336,707 tons).[29] The remaining disposal capacity for the County's Class III landfills is estimated at approximately 148.40 million tons as of December 31, 2019.[30]

Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of Class III solid waste. As of December 31, 2019, the Sunshine Canyon Landfill had a remaining capacity of approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.[31] The landfill has a permitted maximum daily intake of 12,100 tpd and the 2019 disposal rate was approximately 6,919 tpd.

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

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

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

- Olinda Alpha Sanitary Landfill in Orange County;
- Frank R. Bowerman Sanitary Landfill in Orange County;
- H.M. Holloway Landfill in Kern County;
- Prima Deshecha Sanitary Landfill in Orange County;
- Simi Valley Landfill & Recycling Center in Ventura County;

[29] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 26.*

[30] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 32.*

[31] *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.*

- El Sobrante Landfill in Riverside County;
- San Timoteo Sanitary Landfill in San Bernardino County;
- Mid-Valley Sanitary Landfill in San Bernardino County; and
- Mesquite Regional Landfill in Imperial County.[32]

(ii) Unclassified Landfills

Unclassified landfills accept construction and demolition waste, certain green (landscaping) waste, and concrete, asphalt, and similar materials that are chemically and biologically inactive. In 2019, the amount of inert waste materials disposed Countywide was 266,452 tons.[33]

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.[34] The remaining capacity of this landfill is estimated at 47.07 million cubic yards (58.84 million tons) with a projected capacity exhaustion in 221 years; however, the landfill has a permit closure date in 26 years.[35]

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

Waste generated in the City may also be diverted from landfills and recycled. LASAN's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and reuse programs in the City.[36] The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (HHW), and helps create markets for recycled materials.[37] In order to help meet the diversion goals of AB 939 and the City, the City adopted the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from LASAN prior to collecting, hauling, and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible.

In 2000, the City had a diversion rate of approximately 58.8 percent.[38] In 2001, the City adopted a 70 percent diversion rate goal by the year 2020. During his term of office, Mayor Antonio

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[32] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 25. Appendix E-2, Table 6.*
[33] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 25.*
[34] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.*
[35] *County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, page 33.*
[36] *Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide.*
[37] *Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide.*
[38] *Los Angeles Bureau of Sanitation, AB 939 2000 Report, August 2001, page ES-1.*

Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new goal of "Zero Waste" by the year 2025. By the end of 2011, the City achieved a diversion rate of 76.4 percent.[39]

3. Project Impacts

a) Thresholds of Significance

In accordance with the State *CEQA Guidelines* Appendix G (Appendix G), the Project would have a significant impact related to utilities and service systems if it would:

Threshold a) ***Generate solid waste in excess of State and 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 the following factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

- *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 it 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 environmental impacts of the Project with respect to solid waste generated during construction and operation are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the Project's solid waste generation and future landfill capacities, including a discussion of recycling programs and design features that would be implemented with the Project. Projected solid waste generation and future landfill capacities are provided in the *City of Los Angeles* SWIRP, which is a 20-year master plan to

[39] *City of Los Angeles Department of Public Works Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 7.*

reduce waste, increase recycling, and manage trash in the City. Project solid waste generation estimates are based on generation rates provided by LASAN.[40]

c) Project Design Features

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

d) Analysis of Project Impacts

Threshold a) Would the project generate solid waste in excess of State and 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

Implementation of the Project would generate construction and demolition waste. Typical construction and demolition debris include concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of the approximately 32,550 square feet of existing commercial industrial buildings and approximately 9,461-square-foot of surface parking lot area that would be disposed of as inert waste. Pursuant to the City's Green Building Code, the Project would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill.

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 842 tons of solid waste[41] over the entire construction period, and approximately 1,739 tons of demolition debris.[42] This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation

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[40] *City of Los Angeles, Board of Public Works, Bureau of Sanitation, "Solid Waste Generation," 1981.*

[41] *A construction waste generation rate of 4.02 pounds per square foot was used. 418,709 square feet of construction (to assume a worst case scenario this includes complete demolition of the entire existing hotel) multiplied by 4.02 pounds is 1,683,210 pounds (841.61 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.*

[42] *A building demolition waste generation rate of 0.046 tons per square foot was used. 32,550 square feet of demolition multiplied by 0.046 pounds is 1,497.3 tons. Source: CalEEMod User Guide Appendix A, page 12:1 sf of building space represents 0.046 ton of waste material. A surface parking demolition waste generation rate of 9,461 square feet of surface area at 1-foot deep slab = 9,461 cubic feet of demolition volume, or 350 cubic yards was used. The asphalt conversion factor is 1 cubic yard of asphalt/paving = 1,380 pounds of waste. Therefore, the parking areas would generate approximately 483,000 pounds, or 242 tons of demolition debris. Source: California Department of Resources Recycling and Recovery, Conducting a Diversion Study – A Guide for California Jurisdictions, Publication No. 311-1999-0006, April 1, 2001. Total demolition debris is 1,739 tons (1,497.3 + 242 = 1,739.3).*

would occur due to recycling. The construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the 2019 CoIWMP concludes that there is current available capacity of 58.84 million tons in the County for the disposal of inert waste.[43] Therefore, the Project-generated demolition debris of 1,739 tons and construction waste of 842 tons (i.e., asphalt and construction debris) would represent approximately 0.004 percent of the inert waste disposal capacity in the region. **Thus, the Project would not generate construction-generated inert waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals and, therefore, impacts would be less than significant.**

(b) Operation

The Project would generate solid waste that is typical of a residential/hotel mixed-use and be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in **Table IV.M.3-2, Project Estimated Daily Solid Waste Generation**, the Project would generate a net increase in solid waste of approximately 4,242 pounds per day (ppd).

Table IV.M.3-2
Project Estimated Daily Solid Waste Generation

Land Use	Unit	Generation Rate [a] (pounds/day)	Total Generation (pounds/day)
Apartment: 1 Bedroom	74 du	12.23/du	905
Apartment: 2 Bedroom	62 du	12.23/du	758
Hotel [b]	274 emp [c]	10.53/emp	2,885
Museum	30 emp [c]	10.53/emp	316
Restaurants	29 emp [c]	10.53/emp	305
		Project Total Solid Waste Generation	5,169
		Existing Solid Waste Generation	*927*
		Project Net Total Solid Waste Generation	**4,242**

Notes: du = dwelling units; emp = employee
a Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (commercial rate used).
b Hotel use includes all ancillary uses, including gym, ballroom and amenity terraces, meeting rooms, lobbies, and other amenities.
Source (table): EcoTierra Consulting, 2020.

All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the Project would divert 50 percent of its solid waste generated pursuant to the proposed City and County Specific Plans, thereby diverting this waste from landfills. Nonetheless, this analysis conservatively assumed that all 4,242 ppd (2.1 tons) of the Project's solid waste would be disposed of at regional landfills. As discussed previously, the permitted daily intake of the Sunshine Canyon Landfill is 12,100 tons, while the average daily intake of is approximately 6,919 tons (for a typical daily remaining intake capacity of 5,181 tons). The Project's 2.1 tons of solid waste would represent 0.02 percent of the permitted daily intake and 0.04 percent of the typical daily remaining intake

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

capacity. As such, the landfill would be able to accommodate the net daily operational waste generated by the Project. Furthermore, according to the 2019 CoIWMP, the Sunshine Canyon Landfill had approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.[44]

Thus, the Project would not generate operation-generated inert waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals and, therefore, impacts associated with operational solid waste 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?

As discussed in **Section V, Other CEQA Considerations**, and in the Initial Study (**Appendix A**), the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **Therefore, the Project would have no impact with respect to Threshold e), and further analysis is required.**

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 previously discussed, the state requires that the Countywide 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

[44] *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.*

the County of Los Angeles by 2034 and an increase of 13.6 percent in employment.[45] 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 172 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

The construction of the Project is estimated to generate a total of approximately 842 tons of solid waste[46] over the entire construction period, and approximately 1,739 tons of demolition debris.[47] Similar to the Project, the Related Projects and other reasonably foreseeable growth within the City would generate inert construction and demolition waste. Also similar to the Project, the Related Projects and reasonably foreseeable growth would be subject to Citywide Construction and Demolition Waste Recycling Ordinance, and the construction and demolition waste would be recycled to the extent feasible. As indicated above, the remaining disposal capacity for the Azusa Land Reclamation Landfill is 47.07 million cubic yards (58.84 million tons) with a permit closure date in 26 years.[48] Given this future capacity, it is expected that all construction and debris waste can be accommodated during that time, and cumulative impacts regarding the disposal of construction and debris waste would not occur. Moreover, the CoIWMP 2019 Annual Report concludes that there is adequate capacity within permitted solid waste facilities (i.e., landfills) to serve the County through the 15-year planning period of 2019 through 2034.[49] **Therefore, the Project's contribution to cumulative impacts due to demolition and construction waste would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Operation

Whereas in the past, solid waste disposal occurred solely within landfills located in the County, the trend in recent years is increased solid waste disposal at landfills located outside of the County. The use of out-of-County landfills will increase in the future given the difficulties associated with permitting new or expanded landfill facilities within the County. As such, the appropriate context within which to view the Project's potential solid waste impacts is total disposal capacity available at landfills located within, as well as outside of, the County. In addition, in order to satisfy the disposal capacity requirements of AB 939, the County is developing facilities utilizing conversion technologies (defined as a wide array of biological, chemical, thermal

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

[46] *A construction waste generation rate of 4.02 pounds per square foot was used. 418,709 square feet of construction (to assume a worst case scenario this includes the adaptive reuse of the existing hotel) multiplied by 4.02 pounds is 1,683,210 pounds (841.61 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.*

[47] *Refer to Footnote #131 above for calculations.*

[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 6.*

[excluding incineration] and mechanical technologies capable of converting post-recycled residual solid waste into useful products and chemicals, green fuels, such as hydrogen, natural gas, ethanol and biodiesel, and clean, renewable energy such as electricity).[50]

Pursuant to CCR Section 18755.5, the County prepared a Countywide Siting Element in June 1997. The Countywide Siting Element has identified goals, policies, and strategies to maintain adequate permitted disposal capacity on an ongoing basis through a 15-year planning period, and for the long term. To provide this needed disposal capacity, the Countywide Siting Element identified sites that may be suitable for development of new or expansion of existing Class III landfills. The Countywide Siting Element also identified out-of-County landfills that may be available to receive waste generated in the County. Additionally, the Countywide Siting Element includes goals and policies to facilitate the use of out-of-County and remote landfills and foster the development of alternatives to landfill disposal.

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

- Increase waste reduction and diversion efforts;
- Continue to encourage the development of alternative technologies;
- Support exportation of waste to out-of-County facilities;
- Utilize Waste-by-Rail system to Mesquite Regional Landfill; and
- Expand in-County Class III landfill capacity.[51]

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

It is also anticipated that Related Projects and other reasonably foreseeable growth would be subject to environmental review on a case-by-case basis to ensure that they would not conflict

[50] *County of Los Angeles, Conversion Technology Evaluation Report, Phase II, October 2007, page ES-1.*

[51] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2017 Annual Report, April 2017.*

with AB 939 waste diversion goals or the solid waste policies and objectives in the County's Summary Plan, Siting Element, as well as the City's SRRE and its updates, the CiSWMPP, and the General Plan Framework. **Therefore, the Project's contribution to cumulative impacts associated with solid waste regulations, plans, and programs would not be cumulatively considerable and cumulative impacts 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 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.