IV. Environmental Impact Analysis

O.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. For a discussion of the regulatory requirements regarding the use, storage, and disposal of hazardous wastes, refer to Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

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

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

- City of Los Angeles General Plan Framework Element
- City of Los Angeles Solid Waste Integrated Resources Plan (Zero Waste Plan)
- RENEW LA Plan
- City of Los Angeles Space Allocation Ordinance
- Citywide Construction and Demolition Debris Recycling Ordinance
- 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 1089*

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

(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

[1] California Public Resources Code Section 41821.

ordinance. Pursuant to AB 1327, the City of Los Angeles adopted the Space Allocation Ordinance (Ordinance No. 171,687), discussed below.

(c) *Senate Bill 1374*

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (Senate Bill [SB] 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004.[2]

(d) *Assembly Bill 1826*

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

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

3 CalRecycle, Mandatory Commercial Organics Recycling (MORe), www.calrecycle.ca.gov/recycle/commercial/organics/, accessed February 6, 2022.

(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.

(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 ColWMP, including preparation of an Annual Report. The ColWMP is to be comprised 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

4 Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes, accessed February 6, 2022.

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.

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]

(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.

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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, September 2020, pages 50 and 51.

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, 2001.

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

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 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

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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.

16 LASanitation, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl state=sc2bv57ho_78&_afrLoop=302690459702255&_afrWindowMode=0&_afrWindowId=ival6l59y#!%40%40%3F_afrWindowId%3Dival6l59y%26_afrLoop%3D302690459702255%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82, accessed February 6 2022.

17 Los Angeles Municipal Code, City Ordinance 184665.

18 Los Angeles Municipal Code, City Ordinance 184665.

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. Additionally, compliance with the Ordinance and LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including construction and demolition (C&D) waste, would be recycled.

(f) Citywide Exclusive Franchise System for Municipal Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System

Solid waste collection, management, and disposal in the City are handled both by LASAN crews and by various permitted private solid waste haulers. The City provides solid waste collection, recycling, and green waste collection services primarily to single-family uses and multi-family uses with four units or less. Private solid waste haulers collect from most multi-family residential uses with four or more units and commercial uses based on an open permit system. Permitted waste haulers must obtain an annual permit, submit an annual report, and pay quarterly fees. However, unlike LASAN, private waste haulers are not required to provide recycling services, operate clean fuel vehicles, offer similar costs for similar services, or reduce vehicle miles traveled. Thus, the existing open permit system limits the ability of the City to address compliance with State environmental mandates and the City's waste diversion goals. Although the City has obtained a 76-percent solid waste diversion rate as identified in the 2013 Zero Waste Progress Report,[20] nearly three million tons of solid waste from the City are still disposed in landfills annually,

[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?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed February 6, 2022.

[20] 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 February 6, 2022.

nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.[21]

To respond to these challenges, and in response to City Council directive, LASAN established Zero Waste LA, a new public-private partnership designed to address the three million tons of waste disposed annually by businesses, consumers and residents.[22] This 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) Los Angeles Green Building Ordinance

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

b) Existing Conditions

(1) Project Site Solid Waste Generation

The Project Site is located in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City. The Project Site is currently developed with Weddington Golf & Tennis, which includes a nine-hole golf course, a putting green, 16 tennis courts, a 25-stall driving range, a 2,700-square-foot clubhouse with a 10-seat café, a tennis shack, and associated surface parking area.

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

[22] 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?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed February 6, 2022.

As shown in **Table IV.O.3-1**, *Estimated Existing Operational Solid Waste Generation*, the existing uses on the Project Site generate a total of 131 tons of solid waste annually that could be disposed of at landfill facilities. This number does not take into account the amount of solid waste that is potentially diverted via source reduction and recycling programs within the City of Los Angeles. Throughout the County of Los Angeles, the CoIWMP assumes an ongoing diversion rate of 65 percent.[23] Additional information regarding the CoIWMP is presented above.

TABLE IV.O.3-1
ESTIMATED EXISTING OPERATIONAL SOLID WASTE GENERATION

	Quantity	Factor[a]	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Weekday Visitors [b]	990 persons	0.5 lbs/person/day	495	64
Weekend Visitors[b]	1,980 persons	0.5 lbs/person/day	990	52
Employees[b]	16 Employees	0.5 lbs/person/day	8	2
Golf Course Maintenance	--	--	72[c]	13
Existing Total Solid Waste Generation[d]			**Avg. 717 lbs/day**	**131**

lbs = pounds

[a] Generation factors provided by the CalRecycle Estimated Solid Waste Generation Rates - Golf land use, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed December 11, 2020.

[b] Weekday visitors calculated based on traffic counts across a 24-hour weekday period. As part of the Transportation Assessment (see Appendix M of this Draft EIR), 511 vehicles visited the site during a 24-hour weekday traffic count. The traffic counts account for the average number of visitors, as well as employees, for the entire Project Site, including the existing golf course, tennis courts, and café uses. There are on average 16 employees at the existing site per day (weekday and weekend days), who are assumed to take their own vehicle. Thus, the remaining 495 vehicles are assumed to be visitors. Assuming an average vehicle occupancy of 2 people per vehicle, 990 visitors are assumed under weekday daily conditions. According to the current site operator, there are roughly twice as many visitors on weekends than during weekdays. Thus, 1,980 visitors are assumed for weekend daily conditions.

[c] Weekly landscape maintenance of the golf course results in an average of approximately 25 bags of clippings per week at approximately 20 pounds per bag. Thus, approximately 500 pounds of clippings per week or roughly 72 pounds per day on average are currently disposed of along with other visitor-generated solid waste materials under existing conditions. [d] To arrive at total daily solid waste generation, the average of the weekday and weekend solid waste generation was calculated. [(495 lbs/day *260 week days per year) + (990 lbs/day*105 weekend days per year))/365 days per year) = 637 lbs per day. 637 lbs (Visitors) + 8 lbs (employees) + 72 lbs (maintenance) = 717 lbs per day.

SOURCE: ESA, 2022.

[23] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan – 2019 Annual Report, September 2020, page 40.

(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. Solid waste management includes solid waste source reduction, recycling, composting, transformation, and disposal.

(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. The CoIWMP 2019 Annual Report shows a downward disposal trend from 2009 to 2011, with a plateau between the years 2011 through 2014, with an increase from 2014 to 2018, and another slight plateau from 2018 to 2019.[24] In 2019, Los Angeles County disposed of 10,969,522 tons of materials, compared to approximately 12.5 million tons in 2005.[25]

Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills. As described above, the County prepared and regularly updates the CoIWMP, including annual reports and a master plan for meeting waste disposal needs through 2034. The CoIWMP 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).[26]

(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 (5,349,231 tons), followed by exports to out-of-County landfills (4,969,741 tons) and transformation facilities (384,097 tons).[27] According to the ColWMP 2019

[24] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Figure 1, Disposal Trend, page 5.

[25] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2012 Annual Report, August 2013. Figure 1, Disposal Trend, page 4.

[26] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, pages 50 and 51.

[27] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 25.

Annual Report, the remaining disposal capacity for the County's Class III landfills was estimated at approximately 148.4 million tons.[28] The 2019 average daily disposal for in-county landfills was 16,756 tons per day, and the maximum daily capacity was 42,297 tons per day.[29]

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). This landfill had a remaining capacity of 55.16 million tons as of December 31, 2019, with a remaining expected life expectancy of 18 years. More notably, the maximum daily capacity for the landfill was 12,100 tons per day, and the 2019 disposal rate was 6,919 tons per day.[30]

In 2019, the annual amount of disposed inert waste materials Countywide, such as earth, landscaping, concrete, and asphalt, was 266,452 tons.[31] 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 10.5 million tons (excluding inert waste and imports) and the 65-percent diversion rate, the County generated approximately 30.1 million tons.[32]

(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. As of 2019, there is only one permitted Inert Waste Landfill that has a full solid waste facility permit (Azusa Land Reclamation Landfill) in Los Angeles County.[33] 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.[34,] 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, processing approximately 3.35 million tons

[28] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 32.

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

[30] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

[31] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 25.

[32] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 26.

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

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

collectively in 2019.[35] For example, the Hanson Aggregates West, Inc and United Rock Products Pit #2 facilities in Irwindale accept up to 4,006 and 3,846 tons per day, respectively, of inert solid waste materials.[36]

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

As described above, under AB 341, all cities and counties in the State are currently required to divert 75 percent of their solid waste streams from landfills.[37] 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 of Los Angeles 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) to be achieved 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 states that they achieved a diversion rate of 76.4 percent.[38] In 2011, the last reported year available, the City disposed of 2,926,011 tons of solid waste to landfills.

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, as

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

36 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 5.

37 California Public Resources Code Sections 41730 et seq.

38 City of Los Angeles Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 7.

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 Source Reduction and Recycling Element or its updates, , the City's Framework Element, or the City Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element.

b) Methodology

The analysis of solid waste impacts addresses the amount of solid waste that would be generated by the Project during both construction and operations, and whether sufficient landfill capacity is available to accommodate the projected volumes of waste so as to not exceed State or local standards or otherwise impair the attainment of solid waste reduction goals. The existing and projected amount of solid waste generated is determined by using a per unit waste generation factor for the various uses, which is derived from relevant guidance documents from CalRecycle and the United States Environmental Protection Agency (USEPA). The amount of solid waste currently generated by the existing uses on the Project Site is subtracted from the projected amount of solid waste to determine the net increase in waste that would be generated by the Project. The analysis focuses on waste generation rates rather than disposal rates, which are reduced significantly by State and local diversion programs and, thus, provides a conservative analysis of the impacts on solid waste facilities that would be caused by the Project. The availability of landfill capacity is taken directly from the CoIWMP 2019 Annual Report. The Project's net increase in waste is compared to existing and planned capacities to determine the Project's potential impact.

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

Project construction would include the demolition of the tennis shack and existing hardscape consisting of concrete and asphalt, removal of the existing landscaping and turfgrass from the Project Site, including the golf course and driving range (fencing, netting and support poles), during site preparation. During the excavation phase, the Project would include the export of approximately 250,000 cubic yards (cy) of excavated soil (associated with excavation for new building foundations, subterranean parking, and stormwater capture and reuse system). The building phase would include 94,554 square feet of new building construction. The Project's construction 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 County may require that the Project's construction-related C&D waste be exported to out-of-County jurisdictions. Future use of the waste-by-rail system to the Mesquite Regional Landfill in Imperial County may also be considered by the County.[39]

Table IV.O.3-2, *Estimated Construction Solid Waste Generation for the Project,* provides an estimate of the amount of construction and demolition debris that would be generated during Project construction. As shown in Table IV.O.3-2, Project construction activities would generate an estimated 397,493 gross tons of waste prior to the diversion of 75 percent of waste required by SB 1374 and required reductions associated with compliance with the Los Angeles Green Building Code (e.g., use of recyclables in building construction, etc.).

[39] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, page 40.

TABLE IV.O.3-2
ESTIMATED CONSTRUCTION SOLID WASTE GENERATION FOR THE PROJECT

Debris Type	Quantity	Generation Factor	Waste Generation (tons)
Site Preparation, Grading and Excavation			
Building Demolition Material	1,000 sf	0.0463 tons/sf[a]	46
Hardscape Demolition	187,684 sf (10,368 cy)	2,400 lbs/cy[b]	12,442
Site Preparation Phase (vegetation and earthwork removal)[d]	6,532 cy	3,000 lbs/cy[c]	9,798
Excavation Phase (exported soil)[e]	250,000 cy	3,000 lbs/cy[c]	375,000
Site Preparation, Grading and Excavation Subtotal	--	--	397,286
Building Construction			
Total New Building Area	94,554 sf	4.39 lbs/sf[f]	208
Total (pre-diversion)[g]			**397,493**
Total (post-diversion)[h]			**99,373**

sf = square feet; cy = cubic yards

[a] One square-foot represents 0.0463 tons of waste material. CalEEMod User's Guide, Appendix A, October 2017, page 13.

[b] Based on the CalRecycle Solid Waste Cleanup Program Weights and Volumes for Project Estimates - Construction Debris, Asphalt or Concrete: Loose, https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/, accessed December 11, 2020.

[c] Based on the CalRecycle Solid Waste Cleanup Program Weights and Volumes for Project Estimates – Excavated/Wet, https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/, accessed December 11, 2020.

[d] Vegetation and earthwork material includes vegetation and soils associated with sod and vegetative growth.

[e] Exported soil during the excavation phase is associated with excavation for new building foundations, subterranean parking, and stormwater capture and reuse system.

[f] Generation factors provided by the USEPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables A-1, A-2, and A-3, 2003.

[g] Totals may not add up due to rounding.

[h] Based on the required diversion rate of 75 percent for C&D waste per the Los Angeles Green Building Code.

SOURCE: ESA, 2022.

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 Hanson Rock Quarry or United Rock Products in Irwindale. 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.H, *Hazards and Hazardous Materials*, of this Draft EIR.

In compliance with the requirements of SB 1374 and Waste Hauler Permit Program, Harvard-Westlake School 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 99,373 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 AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

As indicated above, the remaining capacity of the Azusa Land Reclamation landfill is estimated at 47.07 million cubic yards (58.84 million tons) with a projected closure date of 2046.[40] The Project's construction-generated solid waste disposal after 75-percent diversion would represent 0.17 percent[41] of the estimated remaining capacity at this particular County's landfill alone, which does not take into consideration existing capacity at other sites within the County and out-of-county that could potentially accept Project C&D waste. Other facilities, such as Hanson Aggregates West, Inc and United Rock Products Pit #2 in Irwindale, accept up to 4,006 and 3,846 tons per day, respectively, of inert solid waste materials.[42] Such facilities could also be utilized by the Project when disposing of C&D waste materials. As such, multiple facilities would be available to accommodate the C&D waste from the Project.

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) Operation

Estimated solid waste generation for Project operation is shown in **Table IV.O.3-3**, *Estimated Operational Solid Waste Generation for the Project*. As indicated therein, it is estimated that the Project would generate a net total increase of 48 tons of solid waste per year (pre-diversion). 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. As previously stated, the CoIWMP assumes an ongoing diversion rate throughout the

40 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 58.

41 The Project would generate approximately 99,373 tons of solid waste from construction post-diversion. 99,373 tons / remaining capacity at Azusa of 58.84 million tons would result in 0.17 percent.

42 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, page 56.

County of 65 percent.[43] Therefore, assuming a diversion rate of 65 percent, Project operation would generate a net total of 17 tons of solid waste per year requiring landfill disposal. Also, under the Project, green waste would be used for mulching on-site, composting, and/or otherwise disposed of as green waste consistent with applicable City requirements to avoid solid waste landfills.

TABLE IV.O.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION FOR THE PROJECT

Land Use	Quantity (sf)	Daily Generation Factor	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Proposed New Uses				
HW Athletics + HW Special Events + Public Special Events + Community Users	1,955 persons[a]	0.5 lbs/person/day[b]	978	179 (Pre-Diversion) 63 (Post-Diversion)[e]
Existing Uses (Pre-Diversion)	--	--	717[c]	131 (Pre-Diversion) 46 (post-diversion)
Net Total Pre Diversion (Proposed – Existing)[d]		**--**	**261**	**48**
Net Total (post-diversion)[e]	**--**	**--**	**91**	**17**

lbs = pounds

[a] The number of persons is derived from the average daily number of employees, students, spectators, and visitors anticipated to access/use the Project Site. To determine the average number of persons per day, the total number of persons visiting the Project Site during the calendar was determined, which consist of (1) 106,044 persons associated with Harvard-Westlake activities (based on 2018-2019 data); (2) 585,468 community users (based on standard trip generation rates for a recreational community center and tennis courts from the Institute of Transportation Engineers); (3) 19,500 persons associated with Harvard-Westlake special events (30/year); and (4) 2,500 persons associated with public events (5/year). The total of these four categories = 713,512 persons per year. Thus, 713,512 persons per year divided by 365 days equals 1,955 persons per day. Of these 1,955 persons per day, approximately 82% are associated with community/public use and 18% associated with Harvard-Westlake activities/events. See Appendix O-2 of this Draft EIR for detailed visitor calculations, which were used for solid waste generation purposes.

[b] Generation factors provided by the CalRecycle Estimated Solid Waste Generation Rates – Educational Facilities land use, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed December 11, 2020.

[c] Existing solid waste generation from Table IV.O.3-1 of this section.

[d] Totals may not add up due to rounding.

[e] Based on an anticipated diversion rate of 65 percent for operations. This is conservative as actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent by the year 2020.

SOURCE: ESA, 2022.

[43] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan – 2019 Annual Report, September 2020, page 40.

The County expects that 73,165,531 additional tons of the remaining 148.4-million-ton capacity would be used by 2025, the anticipated year of Project buildout.[44] This would leave an available capacity of 75,234,469 tons of capacity in 2025, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project's estimated net solid waste generation increase with diversion of 17 tons requiring landfill disposal represents 0.0002 percent of the County's annual waste generation of 10,969,522 tons per year and 0.00002 percent of the remaining capacity in 2025.

As previously stated in Subsection IV.O.3.2, Environmental Setting, 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 tons per day, and the 2019 disposal rate was 6,919 tons per day, indicating a remaining daily permitted capacity of 5,181 tons per day. If all of the Project's Class III operational solid waste were taken to Sunshine Canyon Landfill, the Project's net addition (with diversion) of 0.33 tons per day would represent 0.006 percent of Sunshine Canyon's remaining daily permitted capacity.[45]

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 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**

[44] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan – 2019 Annual Report, September 2020, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

[45] Assumes Project's net increase of 17 annual tons is disposed of one time per week over the year (or 52 weeks). Thus, 0.33 tons per week. Accordingly, 0.33 tons divided by 5,181 tons (remaining daily capacity) equals 0.006 percent.

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.

(2) Mitigation Measures

Impacts regarding solid waste were determined to be less than significant. 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 the Initial Study (Appendix A of this Draft EIR), the Project would comply with all State and local statues and regulations related to solid waste, including the City's Space Allocation Ordinance (Ordinance No. 171,687), as well as AB 939 and the City's Zero Waste Plan through source reduction and recycling programs, including with the City's Curbside Recycling Program and Waste Hauler Permit Program. **Less-than-significant impacts would occur related to Threshold (b). No 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 discussed in Subsection IV.O.3.2, Environmental Setting, 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 a 9 percent increase in population growth within the County of Los Angeles by 2034 and an increase of 14 percent in employment.[46] The cumulative

[46] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

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 five 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

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.

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 2034.[47] **For these reasons, the Project's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts would be less than significant.**

(b) Operation

As shown in **Table IV.O.3-4,** *Estimated Cumulative Operational Solid Waste Generation*, the estimated solid waste requiring landfill disposal for the five related projects, not accounting for diversion and recycling, would be 21,292 pounds per day or 7,772 tons per year. The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be 22,270 pounds per day or 7,951 tons per year. These

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

estimates do not take into account the amount of solid waste that would be diverted by the related projects via source reduction and recycling programs, assumed by the County to be 65 percent.

TABLE IV.O.3-4
ESTIMATED CUMULATIVE OPERATIONAL SOLID WASTE GENERATION

Related Project No.	Land Use	Quantity	Daily Generation Factor[a]	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
1	Health Club/Restaurant	91.466 ksf	17 lbs/emp/day[b]	10,418	3,803
2	Retail	10.747 ksf	13 lbs/1000 sf/day	140	51
	Apartments	62 du	12.23 lbs/du/day[c]	758	277
	Other[d]	1.925 ksf	13 lbs/1000 sf/day	25	9
3	Other[d]	15.7 ksf	13 lbs/1000 sf/day	204	74
4	Other[d]	12.782 ksf	13 lbs/1000 sf/day	166	61
5	Apartments	504 du	12.23 lbs/du/day[c]	6,164	2,250
	Restaurant	30 ksf	17 lbs/emp/day[b]	3,417	1,247
	Related Projects Subtotal (without Project)[d]			*21,292*	*7,772*
	Project Total (Pre-Diversion)[e,f]			*978*	*179*
	Cumulative Total with Project (Pre-Diversion)			**22,270**	**7,951**

lbs = pounds; ksf = thousand square feet; sf = square feet; emp = employees; du = dwelling units

[a] Generation factors provided by the CalRecycle Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed December 11, 2020.

[b] Conservatively assumed entire square footage for this use is residential. Employee generation factor is taken from the Los Angeles Department of Transportation's (LADOTs) Traffic Assessment Guidelines, VMT Calculation Version 1.3, May 2020.

[c] Generation factor is for Residential and is sourced from the City of Los Angeles CEQA Thresholds Guide, 2006.

[d] "Other" uses conservatively assumed to be retail uses.

[e] Totals may not add up precisely due to rounding.

[f] Project amount is taken from Table IV.O.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 five 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 by the Project and related projects, without accounting for diversion, would be a negligible increment of the County's annual waste generation of 10,969,522 tons per year (0.08 percent) and remaining 148.4 million-ton capacity in the County's Class III landfills (0.005 percent). With diversion (assuming

65 percent), cumulative yearly disposal for the Project and the related projects would be reduced from 7,951 tons per year to 2,782 tons per year, which would further reduce the cumulative negligible increment of the County's annual waste generation. 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. Up to planning horizon year 2034, the County expects that cumulative solid waste generation would be 178,565,726 tons.[48] It is anticipated that with diversion (assuming a 65-percent diversion rate), only 62,498,004 tons would be disposed, which would leave available capacity in 2034 to serve the County.[49]

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. **Therefore, based on the analysis above, the Project's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on solid waste would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding solid waste were determined to be less than significant. 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.

[48] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Appendix E-2, Table 8.

[49] Calculated by the cumulative waste generation rates for Horizon Year (2034) * 0.35 (estimated percent to be diverted to landfill).