

IV. Environmental Impact Analysis

L.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) 2020 Annual Report prepared by the County of Los Angeles Department of Public Works in October 2021.

2. Environmental Setting

a) Regulatory Framework

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

- Assembly Bill 939 – California Integrated Waste Management Act of 1989
- Assembly Bill 1327 – California Solid Waste Reuse and the Recycling Access Act of 1991
- Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements
- Assembly Bill 1826 – Solid Waste: Organic Waste
- Zero Waste California
- California Green Building Standards
- Assembly Bill 341 – California’s 75-Percent “Recycling” Goal
- County of Los Angeles Countywide Integrated Waste Management Plan 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
- City of Los Angeles Green Building Ordinance

(1) State

(a) *Assembly Bill 939 – California 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

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 – Construction and Demolition Waste Materials Diversion Requirements*

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 four cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate four 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 two 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.

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

³ CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed February 24, 2022.

(f) California Green Building Standards

The 2019 California Green Building Standards Code, referred to as the CALGreen Code⁴, 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 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 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the CoIWMP’s horizon year of 2034.⁶ As stated within the CoIWMP 2020 Annual Report, the County is not anticipating a solid

⁴ Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes. Accessed February 24, 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 (CoIWMP) 2020 Annual Report, October 2021.

waste disposal capacity shortfall within the next 15 years under current conditions.⁷ A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2035.⁸

(3) Local

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

The City's General Plan Framework Element (Framework Element), adopted in August 2001, includes general guidance regarding land use issues that include direction on infrastructure and public services. The Framework Element includes an Infrastructure and Public Services Chapter, which responds to federal and State mandates to plan for 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 (Zero Waste 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

⁷ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 45.

⁸ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, pages 53 and 54.

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

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 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

¹² LASAN, 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 Website, 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&_afLoop=302690459702255&_afWindowMode=0&_afWindowId=ival6l59y#!%40%40%3F_afWindowId%3Dival6l59y%26_afLoop%3D302690459702255%26_afWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82. Accessed February 24, 2022.

¹⁷ Los Angeles Municipal Code, City Ordinance 184665.

¹⁸ Los Angeles Municipal Code, City Ordinance 184665.

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 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-

¹⁹ LASAN 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?_afLoop=302750877623885&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D302750877623885%26_afWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2023.

²⁰ 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?_afLoop=302750877623885&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D302750877623885%26_afWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2023.

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) 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 occupied by cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 square feet of floor area and employs 69 people. As indicated in **Table IV.L.3-1**,

²¹ City of Los Angeles Bureau of Sanitation, Zero Waste Progress Report, March 2013.

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

²³ LASAN, 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?_afLoop=302750877623885&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D302750877623885%26_afWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2023.

Estimated Existing Solid Waste Generation at the Project Site, the existing on-site uses currently generate an estimated 935 tons per year of Class III solid waste. This number does not take into account the amount of solid waste diverted as the result of required compliance with source reduction and recycling programs. The CoIWMP assumes an ongoing diversion rate of 65 percent Countywide.²⁴ With diversion, the existing on-site uses would generate 327 tons of Class III solid waste for disposal in the landfills.

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

Land Use	Quantity^a	Generation Factor^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Freezer/Cooler	360,734 sf (69 emp)	1.42 lbs/100 sf/day	935	5,122
Total (Pre-Diversion)	360,734 sf (69 emp)		935	5,122
Total Post-Diversion)^c			327	1,793

NOTE(S):

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

^a As stated in Section IV.H, *Population and Housing*, of this Draft EIR, existing uses on the Project Site employ approximately 69 people.

^b Generation factors are provided by CalRecycle's Estimated Solid Waste Generation Rates for Manufacturing/Warehouse uses, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed February 24, 2022.

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

SOURCE: ESA, 2023.

(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.

²⁴ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

(3) City of Los Angeles Solid Waste Disposal

The City does not own or operate any landfills; the majority of solid waste generated in the City is disposed of at County landfills. Per the CoIWMP 2020 Annual Report, while the economy has continued to grow in recent years, the amount of waste that residents and businesses generated and disposed of in the County remained relatively low.²⁵ The CoIWMP 2020 Annual Report shows a downward disposal trend from 2008 to 2010 and a plateau at 2010 levels between 2011 through 2014, with an increase from 2014 to 2018 and another slight plateau from 2018 to 2020.²⁶ In 2020, the most recent year for which reported data is available, the County disposed of approximately 11 million tons of materials, compared to approximately 10.5 million tons in 2008, resulting in an overall increase of approximately 500,000 tons of solid waste. Based on these reductions, the CoIWMP assumes an ongoing diversion rate of 65 percent Countywide.²⁷ The overall reduction is due to the reduction in waste disposal at in-county facilities, likely due to the County's solid waste management efforts, markets for recyclable materials, development of alternative technology facilities, diversion credit for such facilities, and the State's AB 341 75 percent recycling goal. The 2020 average daily disposal for in-county landfills was 19,291 tons per day (tpd) and the maximum daily capacity was 45,297 tpd.²⁸

The CoIWMP 2020 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2035 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).²⁹

(a) Class III Landfills

Class III landfills accept non-hazardous municipal solid waste. There are 10 Class III landfills in the County, which collectively accept the majority of solid waste generated in the County (approximately 6,018,859 tons in 2020), followed by exports to out-of-County landfills in Orange, Riverside, San Bernardino, Ventura, and Kern Counties (4,544,808 tons in 2020) and transformation facilities (337,989 tons in 2020).³⁰ The remaining

²⁵ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 5.

²⁶ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 5, Figure 1, Disposal Trend.

²⁷ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

²⁸ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

²⁹ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, pages 53 and 54.

³⁰ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 28.

disposal capacity for the County’s Class III landfills is estimated at approximately 142.67 million tons as of December 31, 2020.³¹

Of the 10 County Class III landfills serving the City, Sunshine Canyon landfill is the largest recipient of non-hazardous solid waste disposal materials (i.e., Class III waste materials). The maximum daily capacity for the landfill is approximately 12,100 tpd, and the 2020 average daily disposal was approximately 7,907 tpd. As of December 31, 2020 Sunshine Canyon landfill had a remaining capacity of approximately 54.08 million tons and a remaining life expectancy of approximately 17 years.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. In 2020, the amount of inert waste materials disposed Countywide was 321,830 tons.³³

As of 2020, 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 51.71 million cubic yards (64.64 million tons) with a projected closure date of 2046.³⁵

In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, collectively processing approximately 3.42 million tons in 2020.³⁶

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

As described in the Regulatory Framework, under SB 1374, AB 939, and AB 341, all cities and counties in the State are currently required to divert 75 percent of their solid waste streams from landfills.³⁷ The County and multiple cities in the County (including the City

³¹ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 35.

³² County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

³³ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 27.

³⁴ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

³⁵ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

³⁶ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

³⁷ California Public Resources Code, Sections 41730 et seq.

of Los Angeles) have achieved the 50 percent goal, with the County diversion rate currently at 65 percent.

The City had a diversion rate of 20.6 percent in 1990, 46 percent in 1995, 65.2 percent in 2000, and 67.1 percent by year 2005. By the end of 2011, the City achieved a diversion rate of 76.4 percent.³⁸ In 2011, the last reported year available, the City generated nearly 16 million tons of potential solid waste.³⁹ Of this total, the City diverted approximately 12.2 million tons (76.4 percent) from disposal into landfills.⁴⁰

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to solid waste if it would:

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

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

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

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

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

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

⁴⁰ Diversion statistic based on data in generation data included in the City of Los Angeles, Zero Waste Progress Report, March 2013. Generation for 2011 (15,986,926 tons of potential solid waste) x 2011 diversion rate (76.4 percent) totals approximately 12.2 million tons of diverted waste materials.

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 (EPA). 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 caused 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 2020 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 waste materials from landfills and increase the recycling of materials in support of solid waste management and reduction goals. 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 approximately 18,896 cubic yards of existing building materials and approximately 2,175 cubic yards of existing hardscape materials; the export of approximately 651,000 cy of excavated soil (associated with excavation for new building foundations and subterranean parking); and new construction totaling approximately 2,521,530 square feet. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the

County’s inert landfill site, Azusa Land Reclamation, or one of a number of inert debris engineered fill operations that are located throughout the County. Although unlikely, the Project construction-related C&D waste could be exported to out-of-county jurisdictions.

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

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

Debris Type	Quantity	Generation Factor	Waste Generation (tons)
Demolition and Excavation			
Building Demolition Material	18,896 cy	400 lbs/cy ^a	3,779
Hardscape Demolition	2,175 cy	2,400 lbs/cy ^a	2,610
Exported Soil	651,000 cy	3,000 lbs/cy ^a	976,500
<i>Site Preparation Subtotal</i>	—	—	982,889
Building Construction			
Total New Building Area	2,521,530 sf (62,260 cy)	4.39 lbs/cy	137
Total (pre-diversion)			983,026
Total (post-diversion)			245,756

NOTE(S):

sf = square feet; cy = cubic yards

^a Generation factors are provided by CalRecycle’s Solid Waste Cleanup Program Weights and Volumes for Project Estimates, <https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/>. Accessed March 2, 2022.

^b Generation factor provided by the United States Environmental Protection Agency (USEPA), Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables A-1 and A-2, 2003. 4.39 lbs/sf identified in Table A-1 used to provide conservative analysis.

SOURCE: ESA, 2022.

As shown in Table IV.L.3-2, Project C&D activities would generate an estimated 983,026 gross tons of C&D waste prior to the diversion of 75 percent of C&D waste required by SB 1374 and required reductions associated with compliance with the City’s Green Building Code (e.g., use of recyclables in building construction, etc.).

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

waste, see the discussion of Hazards and Hazardous Materials impacts in subsection 4, Environmental Impact Analysis, in the Initial Study (Appendix A of this Draft EIR).

In compliance with the requirements of SB 1374 and Waste Hauler Permit Program, the Applicant would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Assuming the required C&D diversion rate of 75 percent per SB 1341 and Waste Hauler Permit Program, the Project is estimated to generate a total of approximately 245,756 tons of C&D waste. Additionally, the Project's construction contractor would deliver all C&D waste generated by the Project to a certified C&D Waste Processing Facility in accordance with AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

Pursuant to the Waste Hauler Permit Program, all C&D waste collected at the Project Site would be taken to a City-certified waste processing facility for sorting and final distribution and disposal. The C&D waste is anticipated to be disposed of at the County's Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county facility currently accepting waste from Los Angeles County. Given that the remaining disposal capacity of the Azusa Land Reclamation Facility is approximately 51.71 million cubic yards (64.64 million tons),⁴¹ the Project's estimated total solid waste disposal needed during construction after 75 percent diversion represents approximately 0.38 percent of the estimated remaining capacity at the Azusa Facility. This is a conservative estimate as it does not take into account the additional capacity provided by inert debris engineered fill operations or the potential for reuse rather than disposal of the exported soil component of the Project's C&D waste.

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

(b) Operation

Estimated solid waste generation for Project operation is shown in **Table IV.L.3-3, Estimated Operational Solid Waste Generation**. As indicated therein, it is estimated that the Project would generate a net increase over and above existing conditions of approximately 5,083 tons of solid waste per year. This estimate does not take into account the amount of solid waste that would be diverted via source reduction and recycling programs within the City. Countywide, the CoIWMP assumes an ongoing diversion rate of 65 percent.⁴² Therefore, assuming a diversion rate of 65 percent, Project operation

⁴¹ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 36.

⁴² County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 41.

would generate a net increase of 1,779 tons of solid waste requiring landfill disposal per year. It is also acknowledged that Project would provide on-site recycling collection facilities for the Project’s occupants within the same area as the other “back-of-house” services for the Project Site.

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

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)^c	Solid Waste Generation (lbs/day)^c
Proposed New Uses				
Residential	1,521 units	0.87 tons/unit/year	1,323	7,249
General Retail	45,266 sf (91 emp) ^d	1.96 tons/emp/year	178	975
Restaurant (High Turnover and Quality Restaurant)	68,299 sf (275 emp) ^e	1.92 tons/emp/year	528	2,893
General Office	411,113 sf (1,644 emp) ^f	2.02 tons/emp/year	3,321	18,197
Hotel	68 rooms (34 emp) ^g	1.76 tons/emp/year	60	329
Proposed Subtotal^e	—	—	5,410	29,643
<i>Existing Uses^h</i>	<i>360,734 sf (69 emp)</i>		(327)	(1,793)
Net Increase (pre-diversion)	—	—	5,083	27,850
Net Increase (post-diversion)ⁱ	—	—	1,779	9,748

NOTE(S):

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

^a Number of employees are based on employee generation factors in the City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1, Land Use and Trip Generation Base Assumptions, May 2020.

^b Generation factors are provided by CalRecycle’s Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed February 24, 2022.

^c Totals may not add up due to rounding.

^d Per the VMT Calculator, General Retail use generates 2 employees/1,000 sf.

^e Per the VMT Calculator Documentation, High Turnover and Quality Restaurants uses generate 4 employees/1,000 sf.

^f Per the VMT Calculator Documentation, General Office use generates 4 employees/1,000 sf.

^g Per the VMT Calculator Documentation, Hotel use generates 0.5 employees/room.

^h Existing subtotal is taken from Table IV.L.3-1. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

ⁱ Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the CoIWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state’s recycling goal of 75 percent.

SOURCE: ESA, 2023.

The Project's estimated annual pre-diversion solid waste generation of 5,083 tons requiring landfill disposal represents approximately 0.05 percent of the County's 2020 annual waste generation of 11,401,870 tons per year and approximately 0.004 percent of the remaining 142.67-million-ton capacity in 2020 in the County's Class III landfills. With diversion, the Project's annual solid waste generation that requires landfill disposal would represent approximately 0.02 percent of the County's annual waste generation and approximately 0.001 percent of the remaining capacity in 2020.

The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.⁴³ This would leave an available capacity of 2,595,393 tons in 2030, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project's estimated annual pre-diversion solid waste generation would represent approximately 0.2 percent of the remaining capacity in 2030. The Project's annual solid waste generation requiring landfill disposal, with diversion, would represent approximately 0.07 percent of the remaining capacity in 2030.

As previously stated in Subsection 2.b, *Existing Conditions*, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the City. The maximum daily capacity for this landfill is 12,100 tpd, and the 2020 disposal rate was 7,907 tpd, indicating a remaining daily capacity of 4,193 tpd of capacity. If all of the Project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's net addition of 16.3 tpd⁴⁴ would represent 0.4 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65 percent rate, this percentage would drop to approximately 0.1 percent.

As described in the CoIWMP 2020 Annual Report, future disposal needs over the next 15-year planning horizon (2035) 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

⁴³ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

⁴⁴ The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal is calculated by 5,083 net tons / 312 days = 16.3 net tons per day.

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

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

Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs. Project operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

(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?

(1) Impact Analysis

(a) Construction

The Project would comply with applicable statutes and regulations related to solid waste, including those pertaining to waste reduction and recycling. During construction, the Project would provide recycling containers on-site in accordance with City's Recycling Space Allocation Ordinance. Additionally, the Project construction contractor would deliver all C&D waste generated by the Project to a certified Construction and Demolition Waste Processing Facility in accordance with AB 939 Compliance Permit requirements. In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, Project construction would achieve at least a 75 percent solid waste diversion rate. Thus, the Project would promote source reduction and recycling, consistent with the applicable federal, State, and local statutes and regulations related to solid waste. **Therefore, Project construction would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

(b) Operation

As described above, the Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the LASAN. During Project operation, in accordance with the City's Recycling Space Allocation Ordinance, which requires that all new development projects provide an adequate recycling area or room for collecting and loading recyclable materials, the Project would provide on-site recycling collection facilities for the Project's occupants within the same area as the other "back-of-house" services for the Project Site. These bins would be emptied and recycled accordingly as a part of the Project's regular solid waste disposal and recycling program. Additionally, the Project would be required to comply with CALGreen Code and the Los Angeles Green Building Code waste reduction measures during Project operation.

The City has taken an aggressive stance on diverting solid waste from landfills, achieving 76.4 percent reduction in landfill deposited in 2011 with an overall goal to achieve a diversion level of 90 percent by 2025 through the implementation of programs with which the Project will comply.⁴⁵ In accordance with Assembly Bills 939 and 341, Project operation would achieve at least a 75 percent solid waste diversion rate through source reduction, recycling, composting and other methods. Thus, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, and RENEW LA Plan. The Project would also generate solid waste that is typical of a residential mixed-use residential building with ground floor retail uses. **Therefore, the Project would comply with applicable federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding solid waste were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

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

⁴⁵ LASAN, Zero Waste Progress Report, Marc 2013, page 7.

e) Cumulative Impacts

(1) Impact Analysis

Solid waste disposal in California is a regional issue administered by regional agencies, and for the Project, is administered by the County. As discussed in Subsection 2.a, *Regulatory Framework*, the State requires that the 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 ColWMP 2020 Annual Report anticipates an approximately 6.5 percent increase in population growth within the County of Los Angeles by 2035 and an increase of 20.1 percent in employment.⁴⁶ 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 39 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 51.71 million cubic yards (64.64 million tons). Additional capacity would also be provided by inert debris engineered fill operations or the potential for reuse rather than disposal of exported soil. Given this available future capacity, it is expected that all C&D waste can be accommodated during that time, and cumulative impacts regarding the disposal of C&D waste would not occur.

Additionally, as required by City Ordinance No. 181,519 (Waste Hauler Permit Program), construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The related projects would also be required to comply with SB 1374 and City Ordinance No. 181,519, which requires the related projects to implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous

⁴⁶ County of Los Angeles Department of Public Works, ColWMP 2020 Annual Report, October 2021, Appendix E-2, Table 7, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County.

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 2020 Annual Report concludes that there is adequate capacity in permitted solid waste facilities to serve the County through the 15-year planning period of 2020 through 2035.⁴⁷ The Project and related projects would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **The Project combined with the related projects would result in an incremental contribution to landfills with available capacity to meets the disposal needs of the Project and the related projects. Accordingly, the Project's contribution to cumulative impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.**

(b) *Operation*

As shown in **Table IV.L.3-4, *Estimated Cumulative Operational Solid Waste Generation***, the estimated solid waste requiring landfill disposal for all 39 related projects, not accounting for diversion and recycling, would be 31,211 tons per year or 171,016 pounds per day. The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be 36,294 tons per year or 198,866 pounds per day. Again, these estimates do not take into account the amount of solid waste that would be diverted via source reduction and recycling programs, assumed by the County to be approximately 65 percent.

As noted above, the CoIWMP 2020 Annual Report indicates that in-County and out-of-County facilities would adequately meet future disposal needs over the next 15-year planning horizon (2035) through a number of strategies that would be carried out during that period. Through planning horizon year 2035, the County expects total solid waste generation countywide to total approximately 211,116,823 tons, which accounts for the 65 percent diversion.⁴⁸

⁴⁷ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, page 6.

⁴⁸ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

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

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Residential	7,660 units	0.87 tons/du/year	6,664	36,516
Commercial ^c	1,025,632 sf (2,749 emp)	1.96 tons/emp/year	5,388	29,523
Hotel	972 rooms (486 emp)	1.76 tons/emp/year	856	4,686
Office	198,635 sf (8,861 emp)	2.02 tons/emp/year	17,899	98,078
Schools ^d	300 students (45 emp)	0.45 tons/emp/year	20	111
Other Services ^e	613,739 sf (352 emp)	1.09 tons/emp/year	385	2,102
Cumulative Subtotal (without Project)^f			31,211	171,016
<i>Project (net increase pre-diversion)^g</i>			<i>5,083</i>	<i>27,850</i>
Cumulative Total (with Project) Pre-Diversion			36,294	198,866
Cumulative Total (with Project) Post-Diversion (65% Diversion)			12,703	69,603

NOTE(S):

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

^a Number of employees per use are based on land use and employment data in Appendix H-1, *Population, Housing and Employment Data Worksheets*, of this Draft EIR.

^b Generation factors provided by are CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed February 24, 2022.

^c Commercial uses include retail, restaurant and associated storage, patio and mezzanine areas, supermarket/grocery, and supporting commercial spaces.

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

^e "Other Services" includes various uses that do not have specific generation rates, such as arts/production space, event space, museum, warehouse, production space, open space/recreation, institutional, amenity space, gym, and health club.

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

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

SOURCE: ESA, 2023.

As the County's Class III landfills serve the entire County of Los Angeles, the Project plus the 39 related projects would represent only a small portion of the overall regional service area. The solid waste generation by the Project and related projects would also represent only a fraction of the available capacity that could be accommodated at the landfills serving them. The approximately 36,294 tons of solid waste per year estimated to be generated by the Project and 39 related projects (pre-diversion) would account for approximately 0.32 percent of the County's expected total annual solid waste generation of 11,401,870 tons per year through 2035. Assuming a diversion rate of 65 percent, the

Project and 39 related projects would generate approximately 12,703 tons per year⁴⁹ requiring disposal, which would account for approximately 0.11 percent of the County's expected total annual solid waste generation and 0.009 percent of remaining 142.67-million-ton annual capacity in the County's Class III landfills..

The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.⁵⁰ This would leave an available capacity of 2,595,393 tons in 2030, assuming no additional disposal facilities are brought online or otherwise expanded to increase capacity. The Project and related projects estimated annual pre-diversion solid waste generation would represent approximately 1.4 percent of the remaining capacity in 2030. The Project's annual solid waste generation requiring landfill disposal, with diversion, would represent approximately 0.5 percent of the remaining capacity in 2030.

As previously stated in Subsection 2.b, *Existing Conditions*, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the City. The maximum daily capacity for this landfill is 12,100 tpd, and the 2020 disposal rate was 7,907 tpd, indicating a remaining daily capacity of 4,193 tpd of capacity. If all of the Project's and related project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's and related project's net addition of 116.3 tpd⁵¹ would represent 2.7 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65 percent rate, this percentage would drop to approximately 1.0 percent.⁵²

Therefore, solid waste generation by the Project and 39 related projects would leave available capacity in 2035 to serve the County.

As discussed above, Project-level impacts related to solid waste disposal would be less than significant. Also, solid waste generation by the Project and 39 related projects would leave available capacity in 2035 to serve the County. Furthermore, the CoIWMP accounts for cumulative waste generation for the 15-year planning period ending in 2035, as the analysis includes projected growth. Therefore, cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity. The Project and related projects would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **The Project combined with the related projects would result in an incremental contribution to landfills with**

⁴⁹ $36,294 \times 0.35 = 12,703$

⁵⁰ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021, Appendix E-2, Table 8, Los Angeles County Solid Waste Disposal Capacity Need Projection.

⁵¹ The Project's daily disposal in tons assumes that landfills operate six days per week. $52 \text{ weeks} \times 6 \text{ days} = 312 \text{ days}$. Therefore, the Project's and related project's daily disposal is calculated by $36,294 \text{ net tons} / 312 \text{ days} = 116.3 \text{ net tons per day}$.

⁵² The Project's daily disposal in tons assumes that landfills operate six days per week. $52 \text{ weeks} \times 6 \text{ days} = 312 \text{ days}$. Therefore, the Project's and related project's daily disposal is calculated by $12,703 \text{ net tons} / 312 \text{ days} = 40.7 \text{ net tons per day}$.

available capacity to meets the disposal needs of the Project and the related projects. Accordingly, the Project’s contribution to cumulative impacts would not be cumulatively considerable. Cumulative impacts on solid waste would be less than significant.

(c) Consistency with Applicable Regulations

Similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction, recycling, and diversion during construction and operation. Compliance with mandated waste reduction and diversion requirements would be required for each related project on a project-by-project basis at the time of plan submittal to the City of Los Angeles and would be reviewed pursuant to the City’s or Green Building Code. In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, the construction and operation of related projects, similar to the Project, would achieve at least a 75 percent solid waste diversion rate through source reduction, recycling, composting and other methods. Thus, the related projects, similar to the Project, would promote source reduction and recycling, consistent with AB 939 and the City’s Solid Waste Integrated Resources Plan, General Plan Framework Element, and RENEW LA Plan. **Therefore, the Project and related projects would comply with applicable federal, State, and local management and reduction statues and regulations related to solid waste. Accordingly, cumulative impacts 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.