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 (County) Countywide Integrated Waste Management Plan (CoIWMP) 2021 Annual Report prepared by the County of Los Angeles Department of Public Works in December 2022.[1] 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)

[1] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022. As of January 2025, this is the most current annual report available.*

- Assembly Bill 1826 (Solid Waste: Organic Waste)
- Zero Waste California
- California Green Building Standards
- Assembly Bill 341 (California's 75-Percent "Recycling" Goal)
- County of Los Angeles Countywide Integrated Waste Management Plan
- City of Los Angeles General Plan Framework Element
- City of Los Angeles Solid Waste Integrated Resources Plan (Zero Waste Plan)
- RENEW LA Plan
- City of Los Angeles Space Allocation Ordinance
- Citywide Construction and Demolition Debris Recycling Ordinance
- Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System
- City of Los Angeles Green Building Ordinance

(1) State

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

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

toward the AB 939 goals.[2] 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 buildings, marinas, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas is to be determined by the appropriate jurisdiction's ordinance. Pursuant to AB 1327, the City of Los Angeles adopted the Space Allocation Ordinance (Ordinance No. 171,687), discussed below.

(c) Senate Bill 1374

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (Senate Bill [SB] 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004.[3]

(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

[2] *Public Resources Code Section 41821.*

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

four cubic yards or more of commercial solid waste per week are also 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.[4]

(e) Zero Waste California

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

(f) California Green Building Standards

The 2022 California Green Building Standards Code, referred to as the CALGreen Code,[5] sets standards for new structures to minimize the State's carbon output. California requires that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Each local jurisdiction retains the administrative authority to exceed the new CALGreen Code. The 2022 CALGreen Code went into effect January 1, 2023.

(g) Assembly Bill 341

AB 341, signed on February 10, 2011, directed that no less than 75 percent of solid waste generated in California be source reduced,[6] recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 also mandated local jurisdictions to implement commercial recycling by July 1, 2012.

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[4] *CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/, accessed January 14, 2025.*

[5] *Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes, accessed January 14, 2025.*

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

(2) Regional

(a) Countywide Integrated Waste Management Plan

Pursuant to AB 939, each county is required to prepare and administer a 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 2021 Annual Report, published in December 2022, provides disposal analysis and facility capacities for 2021, as well as projections to the CoIWMP's horizon year of 2036.[7] As stated within the CoIWMP 2021 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[8] 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 2036.[9]

(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

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[7] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.*

[8] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, page 6.*

[9] *County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, page 6.*

encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[10] 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.[11]

(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.[12] This plan encompasses on-going solutions and programs (i.e., blue and green bin recycling, multi-family recycling, restaurant food scrap diversion, alternative technologies, hazardous waste recycling, Los Angeles Unified School District recycling program, etc.), as well as new programs to be implemented during the planning horizon. In addition, the SWIRP is the result of a mayoral directive that is in line with the City Council's RENEW LA plan, as discussed further below.[13] In May 2008, the stakeholders of the Zero Waste Plan adopted the SWIRP guiding principles to help the City achieve its zero waste goals by 2030.[14] The SWIRP is intended to provide a long-term outline of the policies, programs, infrastructure, regulations, incentives, new green jobs,[15] technology, and financial strategies necessary to achieve 90-percent diversion of solid waste by 2025.[16] 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,

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[10] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, 2001, p. 9-11.*

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

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

[13] *LASanitation, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.*

[14] *City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.*

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

[16] *LASanitation, Zero Waste Plan, Solid Waste Integrated Resources Plan (SWIRP), 2013.*

"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.[17]

(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.[18] This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent by 2025.[19] 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 of in landfills and their associated environmental impacts.

(d) City of Los Angeles Space Allocation Ordinance

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

(e) Citywide Construction and Demolition Debris Recycling Ordinance

On March 5, 2010, the City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) that requires LASAN to ensure that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor. The policy became effective in January 2011.[20] These facilities process received materials

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[17] *LASanitation Website, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=9leakl7yk_5&_afrLoop=22183774145202483#!, accessed January 14, 2025.*

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

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

[20] *LASanitation Website, Construction and Demolition Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop*

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for reuse and have recycling rates that vary from 70 percent to 86 percent, thus exceeding the 70-percent reclamation standard.[21] Additionally, compliance with Ordinance No. 181,519 and LAMC Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including construction and demolition (C&D) waste, would be recycled.

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

Solid waste collection, management, and disposal in the City are handled both by LASAN crews and by various permitted private solid waste haulers. The City provides solid waste collection, recycling, and green waste collection services primarily to single-family uses and multi-family uses with four units or less. Private solid waste haulers collect from most multi-family residential uses with four or more units and commercial uses based on an open permit system. Permitted waste haulers must obtain an annual permit, submit an annual report, and pay quarterly fees. However, unlike LASAN, private waste haulers are not required to provide recycling services, operate clean fuel vehicles, offer similar costs for similar services, or reduce vehicle miles traveled. Thus, the existing open permit system limits the ability of the City to address compliance with State environmental mandates and the City's waste diversion goals. Although the City has obtained a 76-percent solid waste diversion rate as identified in the 2013 Zero Waste Progress Report,[22] nearly three million tons of solid waste from the City are still disposed of in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.[23]

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.[24] This

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%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed January 14, 2025.

[21] *LASanitation Website, Construction and Demolition Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed January 14, 2025.*

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

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

[24] *LASanitation Website, Construction and Demolition Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop*

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innovative franchise system establishes a waste and recycling collection program for all commercial, industrial, and large multifamily customers in the City. 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 allows for the efficient collection and sustainable management of solid waste resources and recyclables. Among other requirements, the City mandates 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

Demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan Annual Reports. The analysis herein is based in part on the CoIWMP 2021 Annual Report (the most recent Annual Report available), which was completed by the County Department of Public Works in December 2022.

Based on the CoIWMP 2021 Annual Report, a discussion of the County's waste disposal at in- and out-of-County landfills and transformation facilities, existing landfill capacity data, and an overview of various technologies in use to reduce solid waste disposal, is provided below.[25]

%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, accessed January 14, 2025.

[25] *A transformation facility is a facility whose principal function is to convert, combust, or otherwise process solid waste by incineration, pyrolysis, destructive distillation, gasification, or to chemically or biologically process solid waste for the purpose of volume reduction, synthetic fuel production, or energy recovery.* *(Footnote continued on next page)*

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

(a) In-County Landfills

Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert wastes, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills.[26] Ten Class III landfills and one permitted inert waste landfill with solid waste facility permits are located within the County, nine of which are currently accepting solid waste.[27,28] Figure IV.O.3-1 on page IV.O.3-11 illustrates the locations of County landfills in relation to the Project Site.

(i) Class III Landfills

As shown in Table IV.O.3-1 on page IV.O.3-12, based on the information provided in the CoIWMP 2021 Annual Report, the total remaining permitted disposal capacity for the County's Class III landfills currently accepting solid waste is estimated at approximately 85.46 million tons. In 2021, approximately 6.24 million tons of solid waste were disposed of at the County's Class III landfills, and approximately 0.375 million tons of solid waste were disposed of at County transformation facilities.[29]

As summarized in Table IV.O.3-1, of the Class III landfill capacity available to the County, approximately 75.81 million tons are available to the City.[30] As landfills operate in a free-enterprise system, their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

Transformation facilities do not include biomass conversion or composting facilities. CalRecycle, Glossary of Terms.

[26] *Inert waste is waste which is neither chemically nor biologically reactive and will not decompose. Examples of this are sand and concrete.*

[27] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.*

[28] *Chiquita Canyon, "Chiquita Canyon Landfill Closes Active Waste Disposal Operations," https://chiquitacanyon.com/chiquita-canyon-landfill-closes-active-waste-disposal-operations/#:~:text=Effective%20January%201%2C%202025%2C%20Chiquita,closure%20and%20post%2Dclosure%20activities, accessed January 15, 2025.*

[29] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2, Table 4.*

[30] *This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Burbank, Pebbly Beach, San Clemente, School Canyon, and Whittier).*

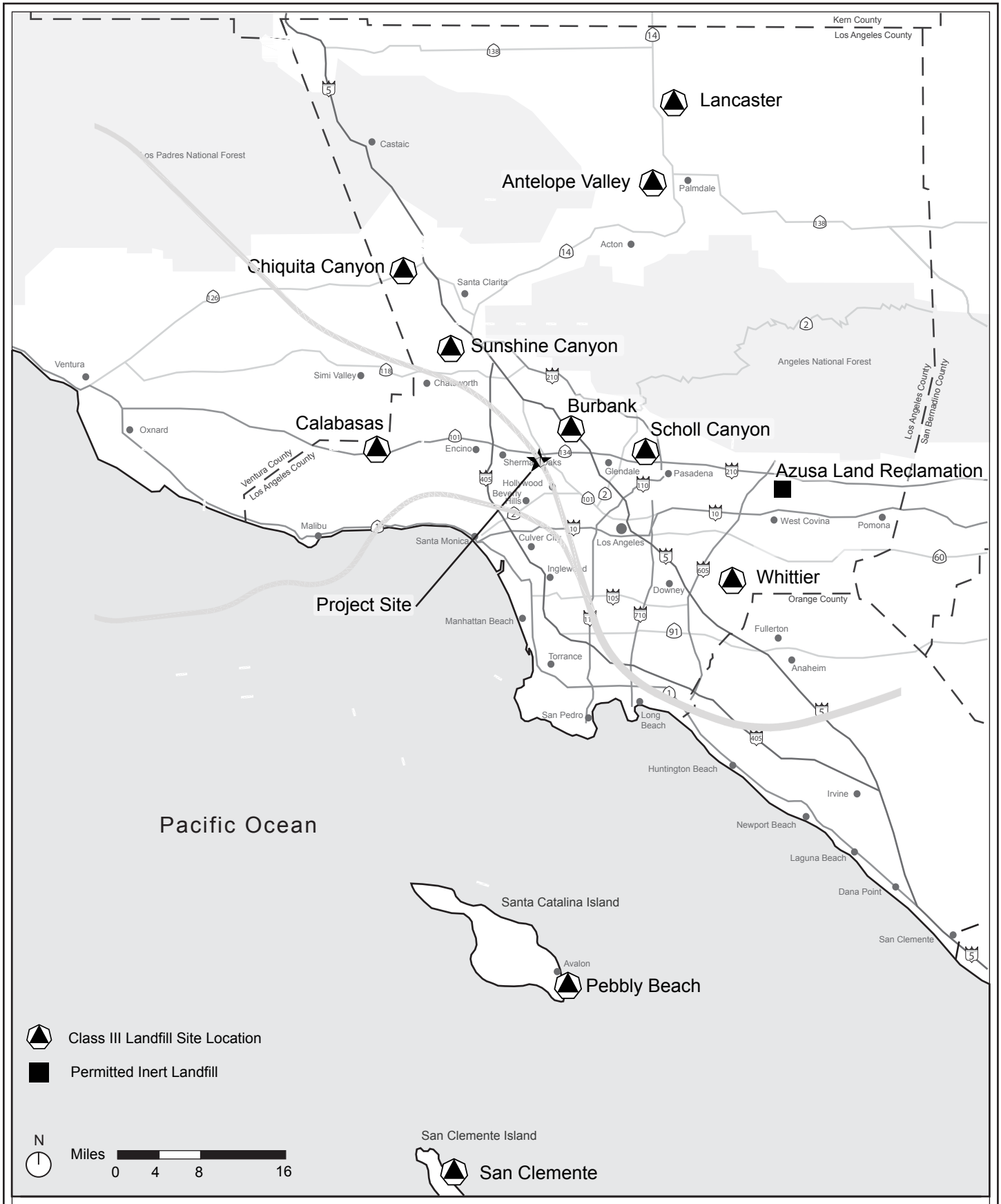

Figure IV.O.3-1
County of Los Angeles Landfills

Source: Google Earth, 2020.

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

Landfill	Location	2021 Total Disposal (million tons)[a]	Total Estimated Remaining Permitted Capacity as of 12/31/21 (million tons)[b]
Class III			
Antelope Valley[c]	Palmdale	0.825	9.24
Burbank[d]	Burbank	0.036	2.37
Calabasas[e]	Unincorporated	0.280	4.51
Chiquita Canyon[f]	Unincorporated	2.018	0
Lancaster	Unincorporated	0.124	9.84
Pebbly Beach[g]	Unincorporated	0.004	0.03
San Clemente[h]	San Clemente Island	0.0003	0.035
Scholl Canyon[i]	Glendale/ Unincorporated	0.423	2.95
Sunshine Canyon City/County	L.A./Unincorporated	2.443	52.22
Whittier (Savage Canyon)[j]	Whittier	0.091	4.26
Class III Total Overall		**6.244**	**85.46**
Class III Total Open to City of Los Angeles[k]		**5.687**	**75.81**
Class III Total Open to Project Site[l]		**5.407**	**71.30**
Permitted Inert Waste Landfills			
Azusa Land Reclamation Company Landfill[m]	Azusa	0.403	50.77
Transformation Facilities			
Southeast Resource Recovery Facility (SRRF)	Long Beach	0.375	0.00137

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

[b] *Estimated Remaining Permitted Capacity is based on landfill owner/operator's response in a written survey conducted by the Los Angeles County Department of Public Works in July 2021, as well as site-specific permit criteria established by local land use agencies, Local Enforcement Agencies, CalRecycle, California Regional Water Quality Control Board, and the South Coast Air Quality Management District. Refer to footnote f below regarding the Chiquita Canyon Landfill.*

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

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

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

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

Landfill	Location	2021 Total Disposal (million tons)[a]	Total Estimated Remaining Permitted Capacity as of 12/31/21 (million tons)[b]

[f] *Although Chiquita Canyon had a remaining disposal capacity of 51.63 million tons as of December 31, 2021, the landfill stopped accepting solid waste effective January 1, 2025. Source: Chiquita Canyon, "Chiquita Canyon Landfill Closes Active Waste Disposal Operations," https://chiquitacanyon.com/chiquita-canyon-landfill-closes-active-waste-disposal-operations/#:~:text=Effective%20January%201%2C%202025%2C%20Chiquita,closure%20and%20post%2Dclosure%20activities, accessed January 15, 2025.*

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

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

[i] *Limited to Scholl Canyon Wasteshed use as defined by City of Glendale Ordinance No. 4780, which is defined as County incorporated cities of Glendale, La Canada Flintridge, Pasadena, South Pasadena, San Marino, and Sierra Madre; County unincorporated communities known as Altadena, La Crescenta, Montrose; unincorporated area bordered by the cities of San Gabriel, Rosemead, Temple City, Arcadia, and Pasadena; and the unincorporated area immediately to the north of the City of San Marino bordered by the City of Pasadena on the west, north and east sides.*

[j] *Limited to City of Whittier use and waste haulers contracted with the City of Whittier.*

[k] *The Class III landfills open to the City of Los Angeles include Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon.*

[l] *The Class III landfills open to the Project Site are those open to the City, which does not include the Calabasas landfill because the Project Site does not lie within the portion of the City served by this landfill (see Footnote e above).*

[m] *By Court Order, on October 2, 1996, the California Regional Water Quality Control Board—Los Angeles Region ordered the Azusa Land Reclamation to stop accepting Municipal Solid Waste.*

Source: Eyestone Environmental, 2025, based on information from County of Los Angeles, Department of Public Works; Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2, Table 4.

The CoIWMP 2021 Annual Report indicates that the Countywide cumulative need for Class III landfill disposal capacity within the next 15 years (i.e., 2036) will exceed the remaining permitted Class III landfill capacity which was approximately 137 million tons as of December 31, 2021.[31] As noted above, with the closure of the Chiquita Canyon Landfill, the remaining permitted Class III landfill capacity is now 85.46 million tons. Therefore, the CoIWMP 2021 Annual Report evaluated four scenarios and, adjusting for the closure of the Chiquita Canyon Landfill which was still operational at the time the report was published, determined that the County would be able to meet the disposal needs of all jurisdictions

[31] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 28.*

through the 15-year planning period under one of the four scenarios.[32] The County would not be able to meet the disposal needs of all jurisdictions through the 15-year planning period under Scenario I, which considers only the utilization of permitted in-County disposal capacity, Scenario II which is the status quo, or Scenario III which assumes jurisdictions meet organic waste disposal reduction targets under SB 1383.[33] Under Scenario IV which assumes all solid waste management options become available, the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period. The CoIWMP 2021 Annual Report also concluded that to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and diversion; study, promote, and develop alternatives to landfilling; develop in-County solid waste processing, transfer, and recycling infrastructure; and enhance in-County capacity and out-of-County disposal, including waste-by-rail (WBR).[34] Additionally, on January 7, 2025, the Los Angeles County Board of Supervisors directed the Department of Public Works to prepare a report dealing with the closure of the Chiquita Canyon Landfill in order to determine the path forward.[35]

(ii) Permitted Inert Waste Landfill

As of 2021, the Azusa Land Reclamation is the only permitted inert waste landfill in the County that has a full solid waste facility permit.[36] As shown in Table IV.O.3-1 on page IV.O.3-12, Azusa Land Reclamation does not face capacity issues as the remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 50.77 million tons. In 2021, approximately 0.4 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this landfill.[37] Given the remaining permitted capacity and based on the average disposal rate of 1,292 tons per day in 2021, this landfill's capacity would be exhausted in approximately 165 years.[38] However, based on the landfill's solid waste facility permit closure date, the landfill is expected to close

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[32] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 35.*

[33] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 35.*

[34] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 35.*

[35] *Press-Telegram, "How will closing Chiquita Canyon Landfill affect solid waste disposal in LA County?", www.presstelegram.com/2025/01/07/how-will-closing-chiquita-canyon-landfill-affect-solid-waste-disposal-in-la-county/, accessed January 15, 2025.*

[36] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 23.*

[37] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2, Table 4.*

[38] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 23.*

in 2045 unless its operating permit is extended.[39] Regardless, the permitted inert waste landfill serving the County is anticipated to have adequate long-term capacity.

(iii) Inert Debris Facilities

Inert debris facilities include Inert Debris Engineered Fill Operations (IDEFO) and other facilities that process inert waste and other construction and demolition waste without a full solid waste facility permit.[40] In 2021, inert debris facilities (excluding Azusa Land Reclamation) collectively handled nearly 3.62 million tons, or approximately 2.89 million cubic yards, of material in the County.[41] Existing inert debris disposal sites in Los Angeles County are located in Irwindale, Montebello, Monrovia, and Sun Valley.[42]

(b) Out-of-County Landfills

Solid waste disposal at out-of-County facilities has increased in recent years. As shown in Table IV.O.3-2 on page IV.O.3-16, in 2021 (the most recent year for which data are available), approximately 36,989 tons per day of solid waste were disposed at out-of-County landfills.[43]

As shown in Table IV.O.3-2, WBR has the potential to create substantial solid waste disposal capacity. WBR systems allow the County to transport waste via existing railways to remote out-of-County disposal facilities. They involve the collection of recyclable waste at materials recovery facilities and the loading of remaining non-hazardous wastes into rail-ready shipping containers. These containers are delivered by truck to local rail yard loading facilities where they are then transported to remote landfills designed and permitted to receive waste via rail. One WBR landfill that may become available for use by the County is the Mesquite Regional Landfill in Imperial County, located approximately 210 miles east of downtown Los Angeles, along the Union Pacific Railroad. The Sanitation Districts of Los Angeles County completed acquisition of the landfill in 2002 and completed construction of all infrastructure in December 2008. This landfill is permitted to accept up to 20,000 tons per day with a total disposal capacity for 660 million tons of solid waste, which is equivalent to a

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[39] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 23.*

[40] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 23.*

[41] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 23.*

[42] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2, Table 5.*

[43] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-5.*

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

Facility/Location Owner/Operator	Rail Access	Distance from Downtown Los Angeles	2021 Average Daily Disposal (tpd)	Remaining Permitted Disposal Capacity[a] (million tons)
Mesquite Regional Landfill[b] Imperial County County Sanitation District No. 2 of Los Angeles County	Yes	210 miles	—	600
H.M. Holloway Landfill, Inc. Kern County Holloway Environmental, LLC	Yes	156 miles	1,568	1.5
Frank R. Bowerman Sanitary Landfill Orange County O.C. Waste and Recycling	No	45 miles	7,146	99
Olinda Alpha Sanitary Landfill[c,d] Orange County O.C. Waste and Recycling	No	30 miles	6,819	11
Prima Deshecha Sanitary Landfill[c] Orange County O.C. Waste and Recycling	No	60 miles	2,009	75
El Sobrante Landfill Riverside County USA Waste Services of California, Inc.	No	60 miles	10,618	134
Mid-Valley Sanitary Landfill San Bernardino County San Bernardino County Solid Waste Management Division	No	53 miles	3,465	33
San Timoteo Sanitary Landfill San Bernardino County San Bernardino County Solid Waste Management Division	No	67 miles	1,085	6
Simi Valley Landfill & Recycling Center Ventura County Waste Management of California, Inc.	No	50 miles	4,279	47
Total			**36,989**	**1,006.5**

tpd = tons per day

— = data are not provided or available according to the CoIWMP 2021 Annual Report.

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

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

Facility/Location Owner/Operator	Rail Access	Distance from Downtown Los Angeles	2021 Average Daily Disposal (tpd)	Remaining Permitted Disposal Capacity[a] (million tons)

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

[c] *The County of Orange has three import waste agreements with waste hauling companies to import waste into Orange County. The County Sanitations Districts and the County of Orange have extended the import waste agreement allowing the County Sanitation Districts to deliver solid waste to the County of Orange's disposal system until June 30, 2025.*

[d] *Olinda Alpha Sanitary Landfill is permitted to accept a maximum of 10,000 tpd for 36 days out of the year.*

Source: County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-5.

lifespan of approximately 100 years.[44] This landfill is fully permitted but not currently operational.[45]

(c) Transformation Facilities

Per California Code of Regulations Title 14, Section 18720, a transformation facility's principal function is to convert, combust, or otherwise process solid waste by incineration, pyrolysis, distillation, gasification, or to chemically or biologically process solid waste for the purpose of volume reduction, synthetic fuel production, or energy recover. Transformation facilities do not include biomass conversion or composting facilities. As of December 31, 2022, there is one solid waste transformation facility in Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery. As indicated in Table IV.O.3-1 on page IV.O.3-12, the Southeast Resource Recovery Facility (SRRF), located in the City of Long Beach, processed approximately 0.375 million tons of solid waste in 2021 and has an available remaining capacity of approximately 1,370 tons per

[44] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 47.*

[45] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-5.*

day.[46] The owner and operator of the SRRF have indicated that there are no plans to increase the permitted daily capacity at the facility.[47]

(d) Use of Conversion Technologies

The County is exploring the use of conversion technologies to reduce future disposal needs, as well as to address global climate change. These state-of-the-art technologies encompass a wide variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products in an environmentally beneficial way. The Southern California Conversion Technology Demonstration Project is an initiative of the County.[48] Conversion technologies include a variety of thermal, chemical, and biological processes that break down solid waste into usable resources, such as ethanol, biodiesel, and other green fuels.[49]

The County Department of Public Works chairs the County Integrated Waste Management Task Force's Alternative Technology Advisory Subcommittee, which facilitates the development of conversion technology projects in Southern California. One such project is the anaerobic digestion system at the CR&R Environmental Services facility in the City of Perris. This system, which broke ground in 2014 and is now operational, produces renewable natural gas from organic waste.[50,51] Another project involves the anaerobic digesters at the Joint Water Pollution Control Plant in the City of Carson. This particular system ultimately produces electricity from methane, which is converted from food waste with sewage sludge.

(e) Class I Landfills

Hazardous wastes are disposed of at Class I landfills. The closest Class I landfill to the Project Site is the Buttonwillow Landfill located in Kern County, approximately 124 miles northwest of the Project Site. Buttonwillow is a fully permitted hazardous waste

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[46] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2, Table 4.*

[47] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 51.*

[48] *Southern California Conversion Technology, About: Why Conversion Technologies?, http://dpw.lacounty.gov/epd/SoCalConversion/About/WhyConversionTechnologies, accessed January 14, 2025.*

[49] *Southern California Conversion Technology, About: Why Conversion Technologies?, http://dpw.lacounty.gov/epd/SoCalConversion/About/WhyConversionTechnologies, accessed January 14, 2025.*

[50] *County of Los Angeles, Department of Public Works, Board Motion of April 20, 2010, Item No. 44, Conversion Technologies in Los Angeles County Six Month Status Update: May Through October 2014, October 22, 2014.*

[51] *CR&R Environmental Services, Anaerobic Digestion, https://crrwasteservices.com/sustainability/anaerobic-digestion/, accessed January 14, 2025.*

facility, permitted by various regulatory agencies in the State of California to receive, store, treat, and landfill a variety of hazardous and non-hazardous waste streams. This facility is capable of managing a large number of Resource Conservation and Recovery Act (RCRA) hazardous wastes, California hazardous waste, and non-hazardous waste for stabilization treatment, solidification, and landfill. Buttonwillow serves a wide variety of industrial customers throughout California. The treatment methods utilized at this facility typically reduce the toxicity of waste materials and make it suitable for disposal. Buttonwillow has a permitted landfill capacity of approximately 13.25 million cubic yards and an estimated closure date of January 2040.[52]

Hazardous waste may also be disposed of at Kettleman Hills Facility, a Class I landfill located in Kings County, approximately 167 miles northwest of the Project Site. The Kettleman Hills Facility is permitted to accept most types of hazardous wastes as defined by the U.S. Environmental Protection Agency (USEPA) and the State of California. Materials accepted at the Kettleman Hills Facility include asbestos debris, petroleum-contaminated soils and debris, soils and debris with metal contamination, household hazardous wastes from collection events, baghouse dusts, various ash waste, filter cake, catalyst solids, latex paint, groundwater, stormwater, clarifier water, and various sludges.[53] The Kettleman Hills Facility's operator, Waste Management, Inc., has proposed the development of an additional hazardous waste facility (the B-20 Landfill) that would open after the B-18 facility reaches capacity and would operate for an estimated 24 years; Waste Management, Inc. is currently seeking permit approval for the proposed B-20 Landfill.[54]

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

LASAN provides solid resources collection services for recyclables, tree and yard trimmings, residual waste, and horse manure for more than 750,000 homes.[55] The four-bin collection system consists of blue bins (recyclables), green bins (tree and yard trimmings), black bins (residual waste) and brown bins (horse manure). Using the calculation methodology adopted by the State of California, the City has achieved a landfill diversion

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[52] *CalRecycle, SWIS Facility Detail, Clean Harbors Buttonwillow LLC, www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3922?siteID=733, accessed January 14, 2025.*

[53] *Waste Management, Inc., Kettleman Hills, Facility Overview, https://kettlemanhillslandfill.wm.com/fact-sheets/2011/facility-overview.jsp, accessed January 14, 2025.*

[54] *Waste Management, Inc., Kettleman Hills, Facility Overview, https://kettlemanhillslandfill.wm.com/fact-sheets/2011/facility-overview.jsp, accessed January 14, 2025.*

[55] *City of Los Angeles, Bureau of Sanitation, Recycling, Solid Resources web page, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s?_adf.ctrl-state=1at8ylua1w_5&_afrLoop=16824505254235924#!, accessed January 14, 2025.*

rate of 76.4 percent.[56] As previously discussed, while LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial and industrial developments in the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

As shown in Table IV.O.3-3 on page IV.O.3-21, in 2023, the City disposed of approximately 2.29 million tons of solid waste at the County's Class III landfills.[57] The 2.29 million tons of solid waste accounts for approximately 3 percent of the total remaining capacity (75.81 million tons; see Table IV.O.3-1 on page IV.O.3-12) of the County's Class III landfills open to the City that are currently accepting solid waste.[58]

As indicated in Table IV.O.3-1, as of December 2022, the latest period for which annual data are available, the remaining disposal capacity for Azusa Land Reclamation (the only permitted inert waste landfill in the County that has a full solid waste facility permit) is approximately 50.77 million tons. As shown in Table IV.O.3-3, in 2023, the City disposed of approximately 75,754 tons of waste in this inert waste landfill. This amounted to approximately 0.15 percent of the total remaining capacity at the landfill in 2022.

(3) City of Los Angeles Hazardous Waste Disposal Programs

LASAN has established seven permanent waste collection sites throughout the City, known as S.A.F.E. (Solvents/Automotive/Flammables/Electronics) Centers, which are open every weekend to allow residents and businesses to conveniently dispose of their household hazardous waste. The S.A.F.E. centers generally accept used motor oil and filters; paint and solvents; e-waste, such as computers, cell phones and televisions; household cleaning products; car and household batteries; fluorescent tubes and bulbs; home-generated sharps, such as needles and lancets; and unused medicine (except controlled substances).[59] To facilitate disposal of household hazardous waste throughout the City, LASAN also provides a

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[56] *City of Los Angeles, Bureau of Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed January 14, 2025.*

[57] *County of Los Angeles, Department of Public Works, Solid Waste Information System (SWIS), Detailed Solid Waste Disposal Activity Report By Jurisdiction of Origin, Jurisdiction: Los Angeles (Reporting Period: January 2023 to December 2023). These numbers represent waste disposal, not generation, and, thus, do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.*

[58] *(2.29 million tons ÷ 75.81 million tons) × 100 = ~3 percent.*

[59] *City of Los Angeles, Bureau of Sanitation, S.A.F.E. Collection Centers flyer, www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010031.pdf, accessed January 14, 2025.*

Table IV.O.3-3
City of Los Angeles Solid Waste Disposal

Landfill/Transformation Facility	2023 Total Disposal (tons)[a]
Class III Landfills	
Antelope Valley Recycling and Disposal Facility	163,891.19
Calabasas Landfill	43,542
Chiquita Canyon Landfill[b]	1,118,829.09
Lancaster Landfill	2,668.49
Whittier (Savage Canyon) Landfill	7,489.10
Scholl Canyon Landfill	2,419.37
Sunshine Canyon City/County Landfill	947,432.90
Total Class III Landfills	*2,286,272.14*
Inert Landfills	
Azusa Land Reclamation Company Landfill	75,754.19
Total Solid Waste Disposal in Landfills by City of Los Angeles	**2,362,026.33**

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

[b] *As noted above, Chiquita Canyon Landfill is no longer accepting solid waste as of January 1, 2025.*

Source: County of Los Angeles, Department of Public Works, Solid Waste Information System (SWIS), Detailed Solid Waste Disposal Activity Report by Jurisdiction of Origin: City of LA (Reporting Period: January 2023 to December 2023), https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx, accessed January 14, 2025.

Mobile Collection Events throughout the City, where residents can drop off waste to be disposed of properly.[60] In addition, CalRecycle has certified used motor oil collection centers throughout the State. These locations accept uncontaminated oil throughout the year. For further discussion of the use, storage, handling, and disposal of hazardous materials and hazardous wastes on the Project Site, refer to Section IV.H, Hazards and Hazardous Materials, of this Draft EIR.

(4) City of Los Angeles Recycling Programs

LASAN develops and implements source reduction, recycling, and composting programs in the City. Such programs include mandatory commercial organics recycling,

[60] *City of Los Angeles, Bureau of Sanitation, Hazardous Waste, S.A.F.E. Centers & Mobile Collection Events, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-hw/s-lsh-wwd-s-c-hw-safemc?_adf.ctrl-state=qbflb4qjn_273&_afrLoop=3331564728185060 3#!, accessed January 14, 2025.*

commercial recycling, blue bin recycling, green bin recycling, tire recycling, and multi-family residential recycling, among others. LASAN and the Department of Building and Safety also implement the City's construction and demolition waste recycling ordinance, which requires that all haulers and contractors handling construction and demolition waste must obtain a waste hauler permit for hauling of such material to a certified construction and demolition processing facility.

(5) On-Site Solid Waste Generation

As summarized in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with studio-related uses, including sound stages, production support, production office, and general office uses. The existing on-site uses generate municipal solid wastes typical of studio-related uses, including, but not limited to, paper, glass, metal, plastics, food waste, wood, cardboard, and landscape waste. As shown in Table IV.O.3-5 and Table IV.O.3-6 on pages IV.O.3-29 and IV.O.3-31 further below, in the impact analysis below, based on City solid waste generation rates, the existing on-site uses currently generate an estimated 3,153 tons of solid waste per year, which is collected by a private waste hauler and disposed of at one or more of the County landfills open to the City listed in Table IV.O.3-1 and Table IV.O.3-3 on pages IV.O.3-12 and IV.O.3-21, respectively.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to solid waste if it would:

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

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

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

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

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the City of Los Angeles Solid Waste Management Policy Plan, the City Framework Element, or the City Curbside Recycling Program, including consideration of the land use–specific waste diversion goals contained in Volume 4 of the SRRE.[61]

b. Methodology

The Project's potential solid waste impacts are based on an analysis of the estimated amount of waste generated during both construction and operation of the Project relative to area-wide disposal rates and the remaining capacity at facilities serving the Project area as identified in the CoIWMP 2021 Annual Report. The Project's solid waste generation is considered both in terms of total amount of waste generated, as well as the amount of waste that would actually be disposed of at a landfill following diversion (e.g., recycling, reuse, or other methods). The existing and projected amount of solid waste generated is determined by using a per-unit waste generation factor, which is derived from relevant guidance documents from CalRecycle and the USEPA, for the various uses. The amount of solid waste currently generated by the existing uses on the Project Site that would be demolished is subtracted from the projected amount of solid waste to determine the net increase in waste that would be generated by the Project. For the assessment of cumulative impacts related to solid waste, the projected cumulative solid waste generation is considered in light of the estimated available capacities of receiving landfills and the various disposal capacity analysis scenarios analyzed in the CoIWMP 2021 Annual Report, while accounting for the closure of the Chiquita Canyon Landfill which occurred after its publication.

[61] *Waste diversion goals have been identified for a limited number of targeted waste generators and materials. Future updates of the SRRE may expand the land uses and materials covered, or modify the current waste diversion goals. LA Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, January 2006.*

(1) Construction

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

(2) Operation

The Project's solid waste generation and anticipated waste disposal needs during operations were estimated using employee generation rates for the proposed uses from the City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, and LASAN City Waste Characterization and Quantification Study generation factors per employee. The Project's estimated net solid waste generation and disposal quantities (after the implementation of required and proposed source reduction and recycling measures) were then compared with the remaining capacity at Class III landfills open to the City and accepting solid waste as set forth in Table IV.O.3-1 on page IV.O.3-12 to determine whether adequate landfill capacity would be available to accommodate the Project.

c. Project Design Features

No specific project design features are proposed with regard to solid waste.

d. Analysis of Project Impacts

(1) Impact Analysis

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?

(a) Construction Impacts

(i) Solid Waste Collection Routes

Construction of the Project would involve demolition and building construction activities. The City's Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) and LAMC Section 66.32 require LASAN to ensure that all mixed construction and demolition waste generated within City limits is taken to a City-certified construction and demolition waste processor by City-licensed haulers who are required to comply with the City's diversion goals. In accordance with these requirements, the Project's

construction and demolition wastes (e.g., wood, concrete, asphalt, cardboard, brick, glass, plastic, and metal) would be recycled or collected by City-licensed private waste haulers contracted by the Applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at Azusa Land Reclamation, the County's permitted inert landfill. Overall, with regard to solid waste collection routes, the Project's construction and demolition waste would be hauled by a private construction contractor permitted by the City with existing established haul routes. In addition, the Project represents an urban infill/redevelopment project in an already fully developed urbanized area that experiences development and the need for the recycling and disposal of construction-related solid waste on an on-going basis, and the Project's construction activities would be short-term and temporary. As such, Project construction activities would not result in the need for an additional solid waste collection route. **Thus, the construction-related solid waste collection route impacts of the Project would be less than significant.**

(ii) Solid Waste Recycling and Disposal Facilities

As shown in Table IV.O.3-4 on page IV.O.3-26, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate a total of approximately 50,074 tons of demolition debris and approximately 3,242 tons of construction debris, for a combined total of 53,316 tons of construction-related waste before the implementation of required/proposed recycling. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Thus, the Project's soil export of approximately 880,000 cubic yards is not included in these construction-related waste generation totals.

Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32.1 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Applying this rate, the Project would dispose of approximately 13,329 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation) over the construction period. This amount of construction and debris waste would represent approximately 0.026 percent of the Azusa Land Reclamation's existing remaining disposal capacity of 50.77 million tons.[62] Thus, the total amount of construction and demolition waste generated by the Project would represent

[62] *(13,329 tons ÷ 50.77 million tons) x 100 = ~0.0263 = ~0.026 percent.*

Table IV.O.3-4
Project Demolition and Construction Waste Generation

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Demolition Waste (Existing Uses to Be Removed)			
Studio/Production and Related Uses	646,120 sf	155	50,074
Total Demolition Waste			*50,074*
Construction Waste (Proposed New Uses)			
Studio/Production and Related Uses	1,667,010 sf	3.89	3,242
Total Construction Waste			*3,242*
Total (prior to diversion)			**53,316**
Total (after 75% diversion)			**13,329**

lbs = pounds

sf = square feet

1 ton = 2,000 pounds

[a] *USEPA, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

Source: Eyestone Environmental, 2025.

a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. As Azusa Land Reclamation generally does not face capacity shortages, as discussed above in the Existing Conditions subsection, and because Azusa Land Reclamation would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste.

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

(iii) Hazardous Waste

As set forth in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, asbestos containing materials (ACMs), lead based paints, and/or polychlorinated biphenyls have been or may be found in one or more of the buildings proposed for demolition. ACMs would be removed in accordance with all applicable local, state, and federal regulations outlined in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, prior to demolition activities. In addition, although not expected, in the event contaminated soils

that require removal are uncovered during earthwork, any such materials would be taken to a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill or the Kettleman Hills Facility, for disposal in accordance with all applicable local, state, and federal regulations.

In addition, construction activities would require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of proposed structures. Those hazardous materials that are not consumed during the construction process would require proper disposal at a licensed hazardous waste disposal facility, such as the Buttonwillow Landfill Facility or the Kettleman Hills Facility, in accordance with all applicable requirements of the relevant regulatory agencies, including the Los Angeles Fire Department (LAFD), Los Angeles Department of Public Works, Los Angeles Regional Water Quality Control Board (LARWQCB), and/or the California Department of Toxic Substances Control (DTSC).

As described above, the Buttonwillow Landfill is the closest Class I landfill to the Project Site and has a permitted landfill capacity of approximately 13.25 million cubic yards. The Kettleman Hills Facility is the next closest Class I landfill and has proposed the development of an additional hazardous waste facility that would open after the existing facility reaches capacity and would operate for an estimated 24 years. Both of these landfills have substantial remaining capacity, and each would be able to accommodate any hazardous waste associated with Project construction activities.

Based on the above, the Project would be served by a landfill that could accept hazardous waste from the Project Site if needed. With compliance with applicable regulatory requirements, Project impacts associated with disposal of construction-related hazardous waste would be less than significant.

(b) Operational Impacts

(i) Solid Waste Collection Routes

As with existing conditions, operation of the Project would generate municipal solid waste typical of studio and studio-related related uses. Solid waste generated by the Project would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City and currently accepting solid waste.[63] Given that the Project would be an urban infill

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

Project on a site already developed with studio and studio-related uses, the transport of Project-generated solid waste to waste management/disposal facilities would continue to occur along existing solid waste routes of travel. **As such, the Project would not result in the need for additional solid waste collection routes to adequately handle Project-generated waste. Therefore, potential Project impacts associated with solid waste conveyance capacity during operation would be less than significant.**

(ii) Solid Waste Recycling and Disposal Facilities

Operation of the Project would generate additional solid waste requiring disposal in available landfills. As shown in Table IV.O.3-5 on page IV.O.3-29, when accounting for the existing uses to be removed as part of the Project, operation of the Project would generate a net increase of approximately 7,881 tons of Class III solid waste annually. Additionally, when accounting for a diversion rate consistent with the Citywide diversion rate of 76.4, the Project would generate a net increase of approximately 1,860 tons of Class III solid waste annually. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

Project-generated solid waste would be collected by a private waste hauler and taken for disposal at one of the County's Class III landfills open to the Project Site and currently accepting solid waste (i.e., Antelope Valley, Lancaster, or Sunshine Canyon[64]). As shown in Table IV.O.3-1 on page IV.O.3-12, accounting for the closure of the Chiquita Canyon Landfill, the estimated remaining capacity for the County's Class III landfills open to the Project Site is approximately 71.3 million tons. Thus, the Project's net increase of approximately 1,860 tons of Class III solid waste annually after diversion would represent less than 0.003 percent of the estimated 71.3 million tons of remaining Class III landfill capacity available to the Project Site.[65]

As discussed in Section II, Project Description, of this Draft EIR, the proposed Specific Plan would allow for the exchange of two of the permitted studio land uses and associated floor areas to respond to the future needs and demands of the entertainment industry. Floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations of the proposed Specific Plan (as summarized in Section II, Project Description, of this Draft EIR) are met. Specifically, the

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[64] *As indicated previously in Table IV.O.3-1 on page IV.O.3-12, while the Calabasas Landfill is one of the County Class III landfills that serve the City, the Project Site is not located within the portion of the City served by that landfill and, thus, is not included in the parenthetical list above.*

[65] *(1,860 tons ÷ 71.3 million tons) × 100 ≤ 0.003 percent.*

Table IV.O.3-5
Estimated Project Operational Solid Waste Generation[a]

Land Use	Size	Employee Generation Rate per sf[b]	Estimated No. of Employees	Solid Waste Generation Rate[c]	Total Generation (tons/year)
Existing Uses					
Sound Stages	359,730 sf	0.0056	2,014 emp	1.09 tn/emp/yr	2,196
Production Support	255,510 sf	0.002	511 emp	2.02 tn/emp/yr	1,032
Production Office	450,060 sf	0.004	1,800 emp	2.02 tn/emp/yr	3,636
General Office	113,810 sf	0.004	455 emp	2.02 tn/emp/yr	920
Total Existing Uses					*7,784*
Proposed Uses (Buildout)					
Sound Stages	450,000 sf	0.0056	2,520 emp	1.09 tn/emp/yr	2,747
Production Support	300,000 sf	0.002	600 emp	2.02 tn/emp/yr	1,212
Production Office	725,000 sf	0.004	2,900 emp	2.02 tn/emp/yr	5,858
General Office	700,000 sf	0.004	2,800 emp	2.02 tn/emp/yr	5,656
Restaurant[d]	25,000 sf	0.004	100 emp	1.92 tn/emp/yr	192
Total Proposed Uses					*15,665*
Total Net Increase					**7,881**
Total Net Disposal (After 76.4% Diversion)[e]					**1,860**

emp = employee

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Numbers may not precisely add due to rounding.*

[b] *Except for sound stages, employee generation rates are from Los Angeles Department of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general retail rate for production support and general office rate for production office and general office. For sound stages, rounded rate assumes 100 employees for a typical 18,000-square-foot sound stage as a scalable density; employment rate from Manhattan Beach Studios (MBS), June 2021.*

[c] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed May 21, 2024. To present a conservative analysis, the Services—Professional Technical, & Financial rate was used for the office use and Retail Trade—Food & Beverage Stores rate was used for the retail use because these categories have the highest generation rates. The Not Elsewhere Classified rate was used for the sound stages because no comparable category is provided.*

[d] *While 25,000 square feet of retail uses are proposed, for purposes of presenting a conservative solid waste analysis, it is assumed that all 25,000 square feet of such uses could be comprised of ancillary restaurant/commissary uses.*

[e] *Consistent with the current Citywide diversion rate of 76.4 percent.*

Source: Eyestone Environmental, 2025.

total sound stage floor area may be increased from 450,000 square feet up to a total of 575,000 square feet in exchange for equivalent decreases in the floor area of other uses, and the total production support floor area may be increased from 300,000 square feet up to a total of 575,000 square feet in exchange for equivalent decreases in the floor area of other uses. The operational solid waste impacts of this Maximum Impact Scenario are evaluated below.

As shown in Table IV.O.3-6 on page IV.O.3-31, when accounting for the existing uses to be removed as part of the Project, the Maximum Impact Scenario would be the exchange of 125,000 square feet of general office or production office uses for an additional 125,000 square feet of sound stages and the exchange of 275,000 square feet of general office or production office uses for production support uses. As shown in Table IV.O.3-6, this Maximum Impact Scenario would generate a net increase of approximately 8,139 tons of Class III solid waste annually. Additionally, when accounting for a diversion rate consistent with the Citywide diversion rate of 76.4 percent, the Maximum Impact Scenario would generate a net increase of approximately 1,921 tons of Class III solid waste annually. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

Operational solid waste generated under the Maximum Impact Scenario would be collected by a private waste hauler and taken for disposal at one of the County's Class III landfills open to the Project Site. As shown in Table IV.O.3-1 on page IV.O.3-12, the estimated remaining capacity for the County's Class III landfills open to the Project Site and currently accepting solid waste is approximately 71.3 million tons. Thus, the Maximum Impact Scenario's net increase of approximately 1,921 tons of Class III solid waste after diversion would represent less than 0.002 percent of the estimated approximately 71.3 million tons of remaining Class III landfill capacity available to the Project Site.[66]

As previously discussed, the CoIWMP 2021 Annual Report indicates that, assuming no other options are available, such as exporting to out-of-County facilities or the development of new alternative technologies, the Countywide cumulative need for Class III landfill disposal capacity through 2036, estimated at 148.14 million tons in 2033, would exceed the 2021 remaining permitted Class III landfill capacity of approximately 85.46 million tons, which accounts for the closure of the Chiquita Canyon Landfill. Other constraints that also may limit the accessibility of Class III landfill capacity include wasteshed boundaries, geographic barriers, weather, and natural disasters.[67] Therefore, the CoIWMP 2021 Annual Report evaluates four disposal capacity analysis scenarios to determine whether the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period.[68] Under Scenario I, which conservatively considers only the utilization of permitted in-County disposal capacity and diversion at existing rates, the County would not be able to

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[66] *(1,921 tons ÷ 71.3 million tons) × 100 ≤ 0.003 percent*

[67] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, p. 28.*

[68] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, pp. 28–29.*

Table IV.O.3-6
Estimated Project Operational Solid Waste Generation—Maximum Impact Scenario[a]

Land Use	Size	Employee Generation Rate per sf[b]	Estimated No. of Employees	Solid Waste Generation Rate[c]	Total Generation (tons/year)
Existing Uses					
Sound Stages	359,730 sf	0.0056	2,014 emp	1.09 tn/emp/yr	2,196
Production Support	255,510 sf	0.002	511 emp	2.02 tn/emp/yr	1,032
Production Office	450,060 sf	0.004	1,800 emp	2.02 tn/emp/yr	3,636
General Office	113,810 sf	0.004	455 emp	2.02 tn/emp/yr	920
Total Existing Uses					*7,784*
Proposed Uses (Buildout)					
Sound Stages	575,000 sf[d]	0.0056	3,220 emp	1.09 tn/emp/yr	3,510
Production Support	175,000 sf	0.002	350 emp	2.02 tn/emp/yr	707
Production Office	725,000 sf	0.004	2,900 emp	2.02 tn/emp/yr	5,858
General Office	700,000 sf	0.004	2,800 emp	2.02 tn/emp/yr	5,656
Restaurant[e]	25,000 sf	0.004	100 emp	1.92 tn/emp/yr	192
Total Proposed Uses					*15,923*
Total Net Increase					**8,139**
Total Net Disposal (After 76.4% Diversion)[f]					**1,921**

emp = employee

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Numbers may not precisely add due to rounding.*

[b] *Except for sound stages, employee generation rates are from Los Angeles Department of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general retail rate for production support and general office rate for production office and general office. For sound stages, rounded rate assumes 100 employees for a typical 18,000-square-foot sound stage as a scalable density; employment rate from Manhattan Beach Studios (MBS), June 2021.*

[c] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed May 21, 2024. To present a conservative analysis, the Services—Professional Technical, & Financial rate was used for the office use and Retail Trade—Food & Beverage Stores rate was used for the retail use because these categories have the highest generation rates. The Not Elsewhere Classified rate was used for the sound stages because no comparable category is provided.*

[d] *As described in Section II, Project Description, of this Draft EIR, under the Project's land use exchange, the total sound stage floor area permitted within the Project Site under the Specific Plan may be increased from 450,000 square feet up to a total of 575,000 square feet in exchange for decreases in other uses, and production support floor area may be increased from 300,000 square feet up to a total of 575,000 square feet in exchange for decreases in other uses. In addition, production office cannot exceed 725,000 square feet, general office can not exceed 700,000 square feet, and retail/restaurant uses cannot exceed 25,000 square feet. However, the total square footage within the Project Site cannot exceed 2,200,000 square feet.*

[e] *While 25,000 square feet of retail uses are proposed, for purposes of presenting a conservative solid waste analysis it is assumed that all 25,,000 square feet of such uses could be comprised of ancillary restaurant/commissary uses.*

[f] *Consistent with the current Citywide diversion rate of 76.4 percent.*

Source: Eyestone Environmental, 2025.

meet the disposal needs of all jurisdictions through the 15-year planning period. Under Scenario II, which considers the use of existing permitted in-County Class III Landfills and Transformation facilities as well as the use of exports to out-of-County Landfills, the County would similarly not be able to meet the disposal needs of all jurisdictions through the 15-year planning period. Although projected to provide adequate capacity in the CoIWMP 2021 Annual Report, with the closure of the Chiquita Canyon Landfill, Scenario III which assumes meeting SB 1383 organic waste disposal targets would not be able to meet the disposal needs of all jurisdictions beginning in 2034. However, the CoIWMP 2021 Annual Report demonstrates that Scenario IV which assumes all solid waste management options become available would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with the implementation of various strategies to varying degrees.[69] Specifically, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of County disposal, including WBR.[70]

Furthermore, the County will continue to address landfill capacity through the preparation of CoIWMP Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with Countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the CoIWMP 2021 Annual Report. As discussed below, the Project would be consistent with and would further City (i.e., Solid Waste Management Policy Plan, General Plan Framework Element, SRRE) and CoIWMP policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the CoIWMP 2021 Annual Report to adequately meet Countywide disposal needs through 2036 and beyond without capacity shortages. These strategies include maximizing waste reduction and recycling; expanding existing landfills; promoting and developing alternative technologies; expanding transfer and processing infrastructure; and using out-of-County disposal (including WBR).

Thus, based on the amount of solid waste to be generated by the Project, including under the Maximum Impact Scenario, the waste reduction measures that

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[69] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, pp. 33–34.*

[70] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, pp. 33–34.*

would be implemented, and the availability of sufficient landfill capacity under one of the four scenarios evaluated in the CoIWMP, 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. Further, the provision of adequate landfill capacity is the responsibility of the County and not any individual projects. Therefore, potential Project impacts associated with solid waste disposal during operation would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to solid waste standards and the capacity of local solid waste infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and the Initial Study included as Appendix A of this Draft EIR, Project development would comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, as determined in the Initial Study, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **Thus, impacts with respect to Threshold (b) would be less than significant. No further analysis is required.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities

during and beyond the term of the Development Agreement. Additionally, given that County is continually monitoring and updating landfill capacity, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for solid waste is the entire County because the landfills open to the City and the Project Site generally serve the entire County. The Project, which could extend to approximately 2045 under the proposed Development Agreement, in conjunction with growth forecasted in the County through 2028 (i.e., the earliest Project buildout year), would cumulatively generate solid waste. Cumulative growth in the greater Project area includes 13 related projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. These related projects include residential units, commercial (including retail, restaurant and supermarket uses), recreational, and sports facility uses.

(a) Construction Impacts

(i) Solid Waste Collection Routes

Construction of the Project, in combination with the related projects and other ambient growth, would involve demolition and building construction activities. These activities would generate construction and demolition wastes that would be recycled or collected by private waste haulers contracted by each project applicant and taken to a City-certified waste processing facility for sorting and final distribution, including disposal at the County's inert landfill (i.e., Azusa Land Reclamation). Since the Project Site and the related projects are located within a highly urbanized area of the City, where frequent development and associated demolition and hauling of inert waste to processing facilities and the Azusa Land Reclamation already occur on a regular basis, and since construction and demolition waste would be hauled by private construction contractors permitted by the City, who already have established haul routes, the Project and each of the related projects would not result in the need for additional solid waste collection routes during construction. **Therefore, the Project and related projects would result in less-than-significant cumulative impacts related to solid waste collection routes during construction.**

(ii) Solid Waste Recycling and Disposal Facilities

Construction of the Project, in conjunction with forecasted growth in the County through the Project's earliest buildout year of 2028, would generate construction and demolition waste, resulting in a cumulative increase in the demand for inert waste landfill capacity. As analyzed above in the Project-level analysis under Threshold (a), the Project

would dispose of an estimated 13,329 tons of construction and demolition waste in the County's inert waste landfills after accounting for a 75-percent diversion pursuant to the requirements of SB 1374. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), future cumulative development in the City would be required to implement measures to divert construction and demolition waste from landfills and adhere to mandatory Code diversion rates for residential and non-residential uses, as applicable. Furthermore, as described above under both Existing Conditions and Threshold (a) of the Project-level impact analysis, between the permitted inert waste landfill (Azusa Land Reclamation) and other landfills accepting inert waste, the County does not face inert landfill capacity issues. Lastly, as indicated in the Project-level analysis above, the Project's construction solid waste that would require landfilling at the Azusa Land Reclamation would represent only approximately 0.026 percent of the Azusa Land Reclamation's existing remaining disposal capacity of 50.77 million tons, which would not be cumulatively considerable. Lastly, except for one of the related projects (i.e., Related Project No. 11, Sportsmen's Lodge), the other 12 related projects would be relatively small in scale, and, even with Sportsmen's Lodge, the construction-related solid waste associated with these projects, in combination with that associated with the proposed Project, would represent a negligible proportion of the available remaining capacity of the Azusa Land Reclamation. **Therefore, the Project and related projects would result in less-than-significant cumulative impacts related to inert waste facilities during construction.**

(iii) Hazardous Waste

As discussed previously in the Project-level analysis under Threshold (a) above, ACMs, lead based paints, and/or polychlorinated biphenyls have been or may be found in one or more of the buildings proposed for demolition. These materials would be removed in accordance with all applicable local, state, and federal regulations prior to demolition activities. In addition, although not expected, in the event that contaminated soils are found during earthwork activities, such materials would be disposed of at permitted Class I hazardous materials disposal facilities such as the Buttonwillow Landfill, which has a permitted landfill capacity in excess of approximately 13.25 million cubic yards, or the Kettleman Hills Facility, which was approved for expansion in 2014. Both of these Class I landfills have substantial remaining capacity, and both would be able to serve the Project.

As with the Project, construction activities of the related projects could also involve the demolition of existing buildings that may contain ACMs, lead based paint, and/or polychlorinated biphenyl. Related projects could also include earthwork, involving contaminated soil, and would require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, involved in the construction of new or rehabilitated structures. However, as with the Project, any of the above associated with the related projects and other cumulative development in the City

would be subject to applicable federal, state and local regulations enforced by the LAFD, City Department of Public Works, various County departments, LARWQCB, and/or DTSC. Compliance with these regulations would ensure that hazardous waste associated with construction of the related projects and other cumulative growth in the County are disposed of at licensed hazardous materials disposal facilities, such as the Buttonwillow Landfill and Kettleman Hills Facility which, as indicated previously, have substantial remaining capacity.

Based on the above, the Project and the related projects would result in less-than-significant cumulative impacts related to hazardous waste disposal during construction.

(b) Operational Impacts

(i) Solid Waste Collection Routes

As indicated in the Project-level analysis under Threshold (a) above, operation of the Project would generate municipal solid waste typical of studio and studio-related uses. Waste generated by operation of the Project would be recycled or collected by City-permitted private waste haulers contracted by the Applicant or its successor and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. As further indicated therein, given that the Project would be an urban infill Project on a site already developed with studio/production uses, the transport of Project-generated solid waste to waste management/disposal facilities would continue to occur along existing solid waste routes of travel, with the waste to be disposed of at landfills open to the City. The municipal solid waste generated by operation of the related projects and other cumulative development in the area would be typical of residential, retail, restaurant, supermarket, recreational, and sports facility uses (i.e., similar municipal waste to the Project but also household municipal waste and more green waste). Nevertheless, as with the Project, this municipal solid waste would be recycled or collected by City-permitted private waste haulers contracted by each project applicant and taken for disposal at one of the County's Class III landfills open to the City with most, if not all, of the related projects and other cumulative development occurring on urban infill projects in the City and, thus, along established solid waste collection routes.[71] **As such, the Project and the related projects would not result in the need for additional solid waste collection routes to adequately handle new solid waste generated by the operation of cumulative development. Therefore, cumulative impacts from the operation of the Project and related projects would be less than significant.**

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

(ii) Solid Waste Disposal Facilities

Operation of the Project, in conjunction with the related projects and other forecasted growth, would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at the County's Class III landfills. As previously stated in the Existing Conditions subsection and the Project-level impact analysis under Threshold (a), the Countywide demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the CoIWMP 2021 Annual Report projects waste generation and available landfill capacity through 2036.

The solid waste generation projections in the CoIWMP 2021 Annual Report include the solid waste generation anticipated from cumulative development within the County (including in the City) through 2036. As such, as with the Project, the Class III solid waste that would be generated by the related projects has most likely been accounted for in the Class III solid waste projections in the CoIWMP 2021 Annual Report. Nonetheless, as with the Project, the related projects would each represent a negligible percentage of the overall landfill capacity available.

As discussed above, adequate County Class III disposal capacity would be available under two of the four disposal capacity analysis scenarios studied in the CoIWMP 2021 Annual Report. Individual jurisdictions will continue to pursue the strategies set forth in the CoIWMP 2021 Annual Report and future annual reports in order to maintain adequate disposal capacity.

Based on the above, cumulative impacts with regard to solid waste disposal capacity from the operation of the Project and related projects would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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