IV. Environmental Impact Analysis

O.3 Service Systems – Solid Waste

1. Introduction

This section describes the existing solid waste services for the Project Site and vicinity, identifies associated regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, the analysis in this section assesses the Project's potential to result in the need for new or expanded landfill facilities, the construction of which could cause significant environmental effects. This analysis is based in part on the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2019 Annual Report prepared by the County of Los Angeles Department of Public Works in September 2020. For a discussion of the regulatory requirements regarding the use, storage, and disposal of hazardous wastes, refer to Section IV.G, Hazards and Hazardous Materials, of this Draft Environmental Impact Report (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
- Senate Bill 1327 – California Solid Waste Reuse and the Recycling Access Act of 1991
- SB 1374 – Construction and Demolition Waste Materials Diversion Requirements
- AB 1826 – Mandatory Commercial Organics Recycling
- Zero Waste California
- California Green Building Standards
- AB 341
- The Los Angeles County Integrated Waste Management Plan

- City of Los Angeles Solid Waste Integrated Resources Plan
- City of Los Angeles General Plan Framework Element
- Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles
- Recycling Space Allocation Ordinance
- Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling and Upcoming Zero Waste-LA Franchise System
- L.A.'s Green New Deal (Sustainable City pLAn)
- Los Angeles City Ordinance No. 17687 (Section 19.c) – Recycling
- Ordinance No. 181519 – Amendment to the Los Angeles Municipal Code and Chapter VI, Article 6, Sections 66.32 through 66.32.5 of the Los Angeles Municipal Code
- Los Angeles Green Building Code
- Los Angeles County Department of Regional Planning "Clean Hands" Waiver for the Chiquita Canyon Landfill

(1) State

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

Assembly Bill (AB) 939,—the California Integrated Waste Management Act of 1989 —and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, were enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 requires city and county jurisdictions to develop and implement a schedule to divert at least 50 percent of the total waste stream from landfill disposal by 2000, and to maintain that 50 percent diversion rate beyond 2000. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. The City of Los Angeles (City) surpassed the state-mandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate.[1] As of March 2013, the City has diverted 76.4 percent of waste from landfills.[2]

[1] City of Los Angeles, LA Sanitation & Environment (LASAN), Year 2000 AB 939 Annual Report, August 2001.
[2] LASAN, Zero Waste Progress Report, 2013.

AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the required diversion goals. The SRRE contains diversion programs and policies 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 Integrated Waste Management Board, now known as CalRecycle, to update their progress toward the AB 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).[3]

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

The California Solid Waste Reuse and the Recycling Access Act of 1991[4] (Senate Bill [SB] 1327), as amended, requires each local jurisdiction to adopt an ordinance requiring any commercial, industrial, or institutional building, marina, or residential building having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The sizes of these storage areas are to be determined by the appropriate jurisdiction's ordinance. Pursuant to SB 1327, the City adopted the Space Allocation Ordinance (Ordinance No. 171687), discussed below in the Local section.

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

Passed in 2002, SB 1374, the Construction and Demolition Waste Materials Diversion Requirements, requires jurisdictions to include a synopsis of the amount of construction and demolition (C&D) waste diverted in their annual AB 939 report. The legislation also requires that the CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all C&D waste from landfills.

(d) AB 1826 – Mandatory Commercial Organics Recycling

Effective April 1, 2016, AB 1826 requires mandatory recycling of organic waste generated by certain commercial uses such as restaurants and grocery stores. Beginning on April 1, 2016, businesses that generate 8 cubic yards (cy) or more of organic waste per week must separate food scraps and yard trimmings and arrange for recycling services for that waste in a specified manner. Beginning January 1, 2017, businesses that generate 4 cy or more of organic waste per week also are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cy or more of commercial solid waste per week would be required to arrange for organic waste recycling services. (Should

[3] California Public Resources Code, Section 40050 et seq.
[4] California Public Resources Code Sections 42900–42911.

CalRecycle make a specified determination, this triggering threshold for organics recycling could be reduced to 2 cy or more of commercial solid waste per week on or after January 1, 2020.) AB 1826 also requires each local jurisdiction, on and after January 1, 2016, to implement an organic waste recycling program to divert organic waste from the subject businesses, except as specified for rural jurisdictions.

(e) Zero Waste California

Zero Waste California is a State program that was launched in 2013 to promote a new vision of waste. The concept is premised on maximizing existing recycling and reuses efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

(f) California Green Building Standards

The 2019 California Green Building Standards Code, referred to as the CALGreen Code,[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 standards. The 2019 CALGreen Code went into effect January 1, 2020.

(g) AB 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.

(2) Regional

(a) The Los Angeles County Integrated Waste Management Plan

Pursuant to AB 939, each county is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated

[5] Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes, accessed September 2020.

[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.

Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element. 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 of Los Angeles (County). The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the Countywide Siting Element.

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

(3) Local

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

The LA Sanitation & Environment (LASAN) has developed the Solid Waste Integrated Resources Plan (SWIRP), also known as the "Zero Waste Plan," a master plan to reduce solid waste, increase recycling, and manage trash in the City through the year 2030.[7] The SWIRP is intended to provide an outline of the policies, programs, infrastructure, regulations, incentives, new green jobs, technology, and financial strategies necessary to achieve the City's goal of becoming a "zero waste" city by the year 2030.[8]

The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycled and reused materials. As noted by the City, "zero waste" is a goal and not a categorical imperative; the City is seeking to come as close to "zero waste" as possible. The SWIRP is a programmatic plan to develop a series of policies, programs, and facilities required to reach the City's goals of 75 percent diversion by 2013 and 90 percent diversion by 2025 in the City. The SWIRP has six components for the full implementation of the project objectives: (1) Expansion of Existing Residential and Commercial Programs, (2) Implementation of New Downstream

[7] LASAN, Solid Waste Integrated Resources Plan – A Zero Waste Plan (SWIRP), October 2013.
[8] LASAN, SWIRP, October 2013.

Policies and Programs, (3) Implementation of Mandatory Participation Programs, (4) Adoption of Upstream Policies, (5) Development of Processing Facilities, and (6) Disposal of Remaining Residual Waste at Local or Remote Landfills.[9] These six components will be expanded to improve solid waste management, increase landfill diversion, and accommodate growth.

(b) City of Los Angeles General Plan, Framework Element

The City's General Plan Framework Element (Framework Element), adopted in December 1996 and re-adopted in August 2001, contains goals, policies, and objectives that address solid waste services in the City. The Framework Element provides a Citywide strategy for long-term growth planning and includes an Infrastructure and Public Services chapter, which addresses state and federal mandates to plan for adequate infrastructure in the future. The Framework Element supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[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 site businesses at appropriate locations where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The continuing need for solid waste transfer and disposal facilities, as well as the limited disposal capacity of the landfills in the City, is further addressed by the Framework Element, which indicates that more transfer facilities will be needed in order to dispose of waste at remote landfill facilities. Several landfill disposal facilities that may be accessed by truck are identified in addition to waste-by-rail landfill disposal facilities that can be used by the City to meet its disposal needs.[11]

(c) Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles

The Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan was adopted by the City Council in March 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery. This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent. The plan focuses on combining key elements of existing reduction and recycling programs and infrastructure with new systems and conversion technologies to achieve resource

9 LASAN, LA SWIRP, Final EIR, December 2014.

10 City of Los Angeles, Citywide General Plan Framework An Element of the Los Angeles General Plan, Chapter 9, readopted August 8, 2001.

11 LASAN, Solid Resources Infrastructure Strategy Facilities Plan, November 2000.

recovery (without combustion) in the form of traditional recyclables; soil amendments; and renewable fuels, chemicals, and energy. Furthermore, the RENEW LA Plan calls for reductions in the number of environmental impacts associated with residual materials disposed of in landfills.[12]

(d) Recycling Space Allocation Ordinance

Pursuant to SB 1327, the City enacted the Recycling Space Allocation Ordinance (Ordinance No. 171687) on August 13, 1997, which is incorporated in various sections of the Los Angeles Municipal Code. The Recycling Space Allocation Ordinance requires the provision of an adequate recycling area or room for collecting and loading recyclable materials within development projects.

(e) Citywide 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 multifamily uses with four units or less. Private solid waste haulers collect from most multifamily 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,[13] nearly three million tons of solid waste from the City are still disposed in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multifamily residential and commercial customers.[14]

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.[15]

[12] LASAN, SWIRP, October 2013.
[13] LASAN, Zero Waste Progress Report, 2013.
[14] City of Los Angeles, Final Implementation Plan for Exclusive Commercial and Multifamily Franchise Hauling System, April 2013.
[15] LASanitation, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_

This 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 will allow for the efficient collection and sustainable management of solid waste resources and recyclables. Among other requirements, the City will mandate maximum annual disposal levels and specific diversion requirements for each franchise zone to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. This program began in July 2017.

(f) L.A.'s Green New Deal (Sustainable City pLAn)

In April 2019, the mayor released L.A.'s Green New Deal, Sustainable City pLAn, an action plan that contains goals and policies to respond to climate change, strengthen the local economy, and guide Los Angeles to becoming carbon neutral by 2050. To achieve these policies, a number of goals and objectives were established in various focus areas. One such focus area is solid waste, as landfills are a major source of methane, a greenhouse gas produced by decomposing trash. The goals of the Green New Deal are to shift away from solid waste disposal to resource recovery. As of 2011, the City had reached a 76.4 percent solid waste landfill diversion rate. The Green New Deal aims to increase this rate to 90 percent by 2025, to 95 percent by 2035, and to 100 percent by 2050. To meet this target by 2050, LASAN initiated several long-term solid waste reduction programs, including the reduction in municipal solid waste generation, the elimination of organic waste going to landfills, and the increase in repurposed recyclables within Los Angeles County.[16]

(g) Los Angeles City Ordinance No. 171687 (Section 19.c) – Recycling

The City enacted Ordinance No. 171687 that requires the provision of a recycling area for collecting and loading recyclable materials for all new construction projects that qualify, including multifamily residential projects, and other development projects where the addition of floor area is 30 percent or more.

(h) Ordinance No. 181519 – Amendment to the Los Angeles Municipal Code and Chapter VI, Article 6, Sections 66.32 through 66.32.5 of the Los Angeles Municipal Code

The City enacted Ordinance No. 181519 on January 6, 2011, which requires construction and demolition waste generated within the City to be taken to a City-certified construction

afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159, Accessed September 2020.

16 City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

and demolition waste processing facility so that all waste generated can be calculated and recorded for further recycling efforts and provisions.

(i) Los Angeles Green Building Code

On December 17, 2013, the City Council approved Ordinance No. 182849, which amended Chapter IX, Article 9 of the Los Angeles Municipal Code 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 CALGreen and is implemented through the building permit process.

(j) Los Angeles County Department of Regional Planning "Clean Hands" Waiver for the Chiquita Canyon Landfill

In 2016, the Los Angeles County Department of Regional Planning issued the Chiquita Canyon Landfill a "Clean Hands" Waiver to allow the landfill to continue normal operations while the EIR for the landfill's expansion continues to be processed. Per Section 22.04.110 of the Los Angeles County Code, the Department of Regional Planning has the discretion to allow the continuation of a facility where a violation exists, provided the operator is diligently pursuing the permit. The operator must also continue to meet all the requirements of the Solid Waste Facilities Permit issued by the Local Enforcement Agency of the Department of Public Health.[17]

b) Existing Conditions

(1) Existing Solid Waste Collection and Disposal

The City's solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. Refuse from single-family residential and small (fewer than four units) multifamily residential uses is collected by LASAN and disposed of at City-operated recycling and transfer stations. Waste generated by large multifamily structures, commercial, and industrial businesses, and construction, is collected by private contractors and disposed of at a landfill operated by the County or a private company.

LASAN collects approximately 6,652 tons per day (tpd) (2.23 million tons per year) of refuse, recyclables, yard trimmings, horse manure, and bulky items from single-family

[17] Los Angeles County Department of Regional Planning, Chiquita Canyon Landfill, 2016.

and small multifamily residences.[18] Solid waste transported by both public and private haulers is recycled, reused, and/or transformed at a waste-to-energy facility, or disposed of at a landfill. In March 2013, the City achieved a waste diversion rate of 76.4 percent, exceeding the required 50 percent diversion rate required by AB 939.[19]

(2) Landfills

Landfills that serve the City of Los Angeles area are shown in **Table IV.O.3-1**. As shown, the landfills serving the City have a remaining daily intake capacity of 26,994 tpd.

TABLE IV.O.3-1
LANDFILL CAPACITIES

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley Recycling and Disposal Facility	18	10.97	3,600	2,113	1,487
Azusa Land Reclamation Company Landfill	N/A	58.84	8,000	1,038	6,962
Burbank Landfill No. 3	110	2.66	240	123	117
Calabasas Landfill	8	4.32	3,500	1,946	1,554
Chiquita Canyon Landfill Expansion	28	56.99	12,000	5,525	6,475
Lancaster Landfill and Recycling Center	22	9.95	3,000	363	2,637
Mesquite Regional Landfill*	109	660.00	20,000	0*	—-
Sunshine Canyon City/County Landfill	18	55.16	12,100	6,387	5,713
Whittier (Savage Canyon) Landfill	36	4.45	350	297	53
Total					**24,998**

SOURCE: Los Angeles County Department of Public Works (LACDPW), Countywide Integrated Waste Management Plan (CoIWMP), 2019 Annual Report, September 2020.
NOTES:
* Has not yet begun operation.
N/A – Not available (not provided by operator)

[18] LASAN, Solid Resources, 2020.
[19] LASAN, Zero Waste Progress Report, 2013.

(a) Transformation Facilities and Conversion Technologies

As of June 2018, the Southeast Resource Recovery Facility is the only transformation facility within the County. This facility is located in the City of Long Beach and has a permitted intake of 2,240 tpd of solid waste and takes in an average of 1,196 tpd. This facility has a daily intake availability of 1,044 tpd of solid waste. It is expected that this facility would continue to operate at its current permitted capacities through the planning period of 2024.[20]

The County, as always, is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert non-hazardous household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.[21]

(b) Recycling Facilities

As of 2013, approximately 76 percent of waste generated in the City was diverted from landfills and recycled.[22] The Solid Resources Citywide Recycling Division (SRCRD) of LASAN, develops and implements source reduction, recycling, and composting programs in the City. The SRCRD also provides technical assistance to public and private recycling operations, oversees the City's recycling program, manages the Household Hazardous Waste Program, and helps create markets for recyclable materials.[23] In order to provide more information to the public and private sectors regarding construction waste diversion, the SRCRD published the Construction and Demolition Recycling Guide (Guide), last updated August 2007, which is a directory of recyclers and certified mixed-debris processors that serve the greater Los Angeles area. In addition to an alphabetical listing of companies, the Guide also provides listings by materials accepted (e.g., wood waste, scrap metal, drywall) so that developers and contractors can tailor their recycling choices to suit different project needs. Some of the recycling companies listed in the Guide also recycle operational waste. The Los Angeles County Department of Public Works (LACDPW) maintains a list of all types of landfill and recycling facilities in the County.[24] CalRecycle provides additional facility details for recycling companies in the County.[25]

[20] LACDPW, CoIWMP, 2019 Annual Report, September 2020.
[21] LACDPW, Los Angeles County Conversion Technology Evaluation Report Phase II – Assessment, 2007.
[22] LASAN, Zero Waste Progress Report, March 2013.
[23] LASAN, Zero Waste Progress Report, March 2013.
[24] LACDPW, CoIWMP, 2019 Annual Report, September 2020.
[25] CalRecyle, Where to Recycle, 2020.

(c) Construction and Demolition Debris

The U.S. Environmental Protection Agency (EPA) report entitled Characterization of Building-Related Construction and Demolition Debris in the United States describes the quantity and composition of C&D debris generated in the United States, and summarizes the waste management practices for this waste stream.[26] The State of California defines "C&D debris" as concrete, asphalt, wood, drywall, metals, and many miscellaneous and composite materials generated by the demolition and/or new construction of structures, such as residential and commercial buildings and roadways. Construction debris from building sites typically consists of trim scraps of construction materials, such as wood, sheetrock, masonry, and roofing materials.[27] There is typically much less concrete in construction debris than demolition debris, although some construction projects produce considerable quantities of concrete, depending on the technology used to build concrete structures such as walls. Construction waste is typically disposed of at inert landfills, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. As of 2018, the Azusa Land Reclamation Landfill is the only permitted inert waste landfill in the County that has a full solid waste facility permit. The Azusa Land Reclamation Landfill is located approximately 21.0 miles northeast of the Project Site, has a maximum permitted capacity of 6,500 tpd of waste, and receives an average of 1,358 tpd of inert waste. The Azusa Land Reclamation Landfill has a remaining capacity of 57,716,118 tons and is expected to remain open for approximately 28 years. There are other facilities that process inert waste and other construction and demolition waste in the County. Collectively, these facilities have a maximum daily capacity of 18,516 tpd. There are numerous processing facilities for construction and demolition wastes throughout the County, the nearest of which is the American Reclamation CDI Processing Facility, located at 4560 Doran Street, approximately 3.9 miles northeast of the Project Site. This facility has a permitted capacity of 174 tpd, and has a construction and demolition recycling rate of 85 percent.[28]

[26] U.S. Environmental Protection Agency (EPA), Characterization of Building-Related Construction and Demolition Debris in the United States, 1998.
[27] CalRecycle, Construction and Demolition Debris Recycling, 2020.
[28] LACDPW, CoIWMP, 2019 Annual Report, September 2020.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (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.***

This analysis relies on the Appendix G Thresholds. The analysis uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. They are:

- 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 SRRE or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

b) Methodology

The Project's potential construction solid waste impacts are based on the EPA Municipal and Solid Waste Division generation rates. The Project's construction solid waste generation is considered in terms of total amount of waste generated and the amount that would actually be disposed of at a landfill following diversion. The Project's waste generation and anticipated waste disposal needs during operation were estimated using the waste generation factors from the 2006 L.A. CEQA Thresholds Guide[29] and employee

[29] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

density factors from the Southern California Association of Governments.[30] The Project's estimated waste generation and waste disposal quantities were then compared to the remaining capacity at landfills open to the City to determine whether adequate capacity would be available to accommodate the Project.

c) Project Design Features

The following project design feature for solid waste will be incorporated into the Project:

> **PDF-SW-1**: Hospital operations would be completed in accordance with the City of Los Angeles Hospital Best Management Practices manual (LASAN 2014), which focuses on ways to reduce, reuse, and recycle during operations. This manual reflects Best Management Practices (BMPs) being implemented throughout the healthcare system, most of which are actual practices and others are feasible programs that may be logistically difficult to implement on a facility-wide basis, such as having a mixed recycling collection system in every department. BMPs would be enforced by the City of Los Angeles as part of the Zero Waste LA Franchise System.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Demolition/Construction

C&D waste would be generated during Project demolition and construction activities. It is anticipated that demolition and subsequent grading activities would be completed within the first year of Project construction. Construction of the proposed Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. Based on **Table III-1**, Project Summary Table, in Chapter III of this Draft EIR, and C&D waste generation rates estimated by the EPA's Characterization of Building-Related Construction and Demolition Debris in the United States,[31] the Project is predicted to generate approximately 30,266 tons of solid waste during demolition and construction under Option A and 30,328 tons of solid waste under Option B (**Table IV.O.3-2**).

[30] Southern California Association of Governments, Employment Density Study, Summary Report, October 31, 2001.

[31] EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, 1998.

TABLE IV.O.3-2
PROJECT DEMOLITION AND CONSTRUCTION SOLID WASTE GENERATION ESTIMATES

Demolition Solid Waste Generation

Total Demolition (sf)	Pounds/sf Generation Rate	Total Pounds	Total Tons
364,000	155	56,420,000	28,210

Construction Solid Waste Generation

Total New Construction (sf)	Pounds/sf Generation Rate	Total Pounds	Total Tons
1,056,900 (Option A)	3.89 (Option A)	4,111,341 (Option A)	2,056 (Option A)
1,088,900 (Option B)	3.89 (Option B)	4,235,821 (Option B)	2,118 (Option B)
Total Project C&D Waste		**60,531,341 (Option A)** **60,655,821 (Option B)**	**30,266 (Option A)** **30,328 (Option B)**

SOURCE: EPA, Municipal and Solid Waste Division, Office of Solid Waste, Report No. EPA530-R-98-010, Table 4-7 and Table A-3.
NOTES: sf = square feet; C&D = construction and demolition.

As noted above, State and local regulations require that 50 percent of C&D solid waste be recycled, as well as implementing a zero waste goal for operational activities. Kaiser Permanente would comply with this requirement. A reduction of 50 percent of C&D waste would be estimated at 15,133 tons under Option A and 15,164 tons under Option B. Construction is expected to commence in 2024 and end by 2028, which would result in approximately 1,456 construction days. Assuming 1,456 days of construction, the average daily waste generation rate would be approximately 21 tpd under Option A and B. The C&D debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with City of Los Angeles Ordinance 181519[32] at one of the City's certified processing facilities, including the Azusa Land Reclamation Landfill, which has a remaining capacity of 57,716,118 tons and remaining intake of 5,142 tpd.

Other facilities that process inert waste and other C&D waste in the County have a collective maximum daily capacity of 18,516 tons. In addition, numerous processing facilities for C&D wastes are located throughout the County, the nearest of which is the American Reclamation CDI Processing Facility. This facility has a permitted capacity of 174 tpd and has a construction and demolition recycling rate of 85 percent. As such, any

[32] Amendment to the Los Angeles Municipal Code Chapter VI, Article 6, Sections 66.32 through 66.32.5.

construction and demolition debris requiring disposal at an inert waste landfill would be sufficiently accommodated by existing landfills.

For the reasons stated above, Project demolition and 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. As such, impacts would be less than significant.

(b) Operation

Operational waste has been estimated by determining the net increase in square feet (and associated employees) anticipated during operations. Based on Table III-1, Project Summary Table, in Chapter III; waste generation factors provided in the 2006 L.A. CEQA Thresholds Guide[33]; and employee density factors from the Southern California Association of Governments[34]; the Project is predicted to generate approximately 7.7 tons/day for Option A and 8.1 tons/day for Option B (**Table IV.O.3-3**).

TABLE IV.O.3-3
PROJECT OPERATION SOLID WASTE GENERATION ESTIMATES

Net New Construction (sf)	SF/Employee[1] (Low-Rise Office Land Use)[2]	Approximate Number of Employees	Pounds/Employee/ Day[3]	Total Pounds/Day	Total Tons/Day
692,900 (Option A)	471 (Option A)	1,471 (Option A)	10.53 (Option A)	15,490 (Option A)	7.7 (Option A)
724,900 (Option B)	471 (Option B)	1,539 (Option B)	10.53 (Option B)	16,206 (Option B)	8.1 (Option B)

NOTES:
1 Source: SCAG 2001.
2 Based on median employee per acre.
3 Source: City of Los Angeles 2006.

33 City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.
34 SCAG, Employment Density Study Summary Report, October 31, 2001.

This conservative estimate does not account for the effectiveness and new technologies of recycling efforts, which the Project would be required to implement per AB 939, that each city and county must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. In addition, hospital operations would be completed in accordance with the City of Los Angeles Hospital Best Management Practices manual,[35] which focuses on ways to reduce, reuse, and recycle during operations.

The total daily intake capacity of nearby landfills is currently 26,994 tpd, leaving a significant amount of availability even with the implementation of the proposed Project. A significant amount of solid waste would be directed to the new Mesquite Landfill, which has a permitted daily intake allowance of 20,000 tons; bringing additional relief to other landfills and providing another location for solid waste to be taken.

Therefore, based on projected adequacy of landfill space, in combination with compliance with existing regulatory standards and the City of Los Angeles Hospital Best Management Practices manual, which requires recycling of most of the solid waste generated during operations, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. As such, impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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

Threshold b) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

(1) Impact Analysis

Solid waste management is guided by AB 939, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 requires that localities

[35] LASAN, City of Los Angeles Hospital Best Management Practices, February 2014.

conduct a Solid Waste Generation Study and develop an SRRE. In addition, the SWIRP (or "Zero Waste Plan" adopted by the LASAN) provides an outline of the policies, programs, infrastructure, regulations, incentives, new green jobs, technology, and financial strategies necessary to achieve the City's goal of becoming a "zero waste" city by the year 2030. The SWIRP also specifies goals, objectives, and programs for achieving AB 939. The General Plan Framework supports AB 939 and its goals address many of the programs the City has already implemented to divert solid waste from disposal facilities, including source reduction programs and recycling programs. Ordinance No. 171687 requires the provision of a recycling area for collecting and loading recyclable materials for all new construction projects that qualify. Additionally, the proposed Project would be required to comply with CALGreen Code waste reduction measures for the operation of the proposed Project. In accordance with Ordinance No. 171687 and compliance with the City of Los Angeles Hospital Best Management Practices manual, Project operations would include providing clearly marked, durable, source sorted recycling bins throughout the new developments to facilitate recycling. L.A.'s Green New Deal Plan provides a framework for the City to collectively achieve a 90 percent diversion by the year 2025 and a 95 percent diversion by the year 2035. **As a result, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

As shown in **Table IV.O.3-4**, the 85 related projects, in combination with the proposed Project, would generate approximately 20,554 tpd of solid waste during operation. This estimated cumulative solid waste generation conservatively does not account for the net reduction that would occur as a result of eliminating existing land uses and the effectiveness of recycling. Per AB 939, related projects would be required to divert 50

percent of its solid waste from landfill disposal through source reduction, recycling, and composting, resulting in approximately 10,277 tpd of solid waste during operation.

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

Land Use	Size	Generation Rates*	Total (tpd)
Residential	10,595 du	12.23 lbs/day/du	7.7
School	175 students	1 lb/day/student	0.09
Restaurant	276,147 sf	5 lbs/day/sf	690
Hotel	1,973 rooms	2 lbs/day/room	2.0
Office	2,362,952	6 lbs/day/sf	7,089
Retail	1,717,220	5 lbs/day/sf	4,293
Gym	84,500	5 lbs/day/sf	211
Museum	44,000	5 lbs/day/sf	110
Studio/Sound Stage	3,257,300	5 lbs/day/sf	8,143
Related Projects Total			**20,546**
Project Total (Option B) (most conservative option)			**8.1**
Cumulative Total			**20,554**

NOTES: tpd = tons per day; du = dwelling unit; lbs = pounds; sf = square feet.
* Source: CalRecycle, Estimated Solid Waste Generation Rates, 2021.

As shown in Table IV.O.3-1, landfills that serve the City of Los Angeles area have a remaining intake capacity of 26,994 tpd. Therefore, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. In addition, the owner and operator of the Chiquita Canyon Landfill has requested an expansion of the waste footprint and an increase in the permitted daily disposal. While that project is undergoing the entitlement process, the Department of Regional Planning issued a "Clean Hands Waiver" allowing the landfill to continue operating while processing the new permit application. Finally, as discussed in the CoIWMP, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions.[36] As indicated in Chapter III, Project Description, of this Draft EIR, Phase 3 construction would be completed by 2030.

[36] LACDPW, CoIWMP, 2019 Annual Report, September 2020.

Similar to the proposed Project, the 85 related projects would be required by the City to participate in regional source reduction and recycling programs, pursuant to AB 939, which would reduce the amount of solid waste to be disposed of at the landfills identified in Table IV.O.3-1. Therefore, cumulative development would not generate solid waste in excess of State or local standards, and thus, would not create the need for new or expanded landfills. Cumulative impacts on solid waste service would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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