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IV. Environmental Impact Analysis

L.3 Utilities - Solid Waste

1. Introduction

This Section addresses potential impacts of the proposed Project on solid waste facilities and regulations. This Section describes the solid waste disposal facilities that would serve the Project Site, as well as the regulatory measures intended to minimize the volume of solid waste requiring landfill disposal, such as relevant state legislation and City/County recycling programs. This Section also estimates the amount of solid waste generated daily by the proposed Project during construction and at buildout and evaluates the impacts of solid waste generation by the proposed Project on existing solid waste disposal facilities that serve the region.

In the case of solid waste, conveyance capacity is not an issue since the Applicant hires private haulers, and there is no constraint on their ability to respond to the additional demand generated by implementation of the proposed Project. Thus, the key issue addressed in this Section is landfill capacity in Los Angeles County and the greater region. Information about current and projected landfill capacity and permit status was obtained from landfill operators, the California Integrated Waste Management Board, and the County. The amount of additional solid waste generation created by the proposed Project is calculated in this Section based on solid waste generation rates for different land use categories developed by the California Integrated Waste Management Board and the City of Los Angeles. These rates are multiplied by the projected maximum allowable square footage in each of the proposed Project’s land use categories to project solid waste generation at Project buildout. This solid waste generation is then compared to the future available capacities of solid waste disposal facilities serving the region.

2. Environmental Setting

a. Regulatory Setting

(1) Federal/State Regulations

(a) Federal/State Occupational Safety and Health Act

The Occupational Safety and Health Administration and the California Occupational Safety and Health Administration require special training of handlers of hazardous
materials, notification to employees who work in the vicinity of hazardous materials, acquisition from the manufacturer of material safety data sheets which describe the proper use of hazardous materials, and training of employees to remediate any hazardous material accidental releases. The hazardous waste provisions of Occupational Safety and Health Administration are contained in the Hazardous Waste Operations and Emergency Response Standard. The California Occupational Safety and Health Administration also requires preparation of an Injury and Illness Prevention Program, which consists of an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. The Occupational Safety and Health Administration and California Occupational Safety and Health Administration requirements are enforced via inspections by the State Division of Occupational Safety and Health.

(b) Federal Resource Conservation and Recovery Act (RCRA) and California Hazardous Waste Control Law

The Federal Resource Conservation and Recovery Act and the California Hazardous Waste Control Law regulate the generation, transportation, treatment, storage, and disposal of hazardous waste by “large-quantity generators” (1,000 kilograms/month or more) through comprehensive life cycle or “cradle to grave” tracking requirements. These include maintaining inspection logs of hazardous waste storage locations, records of quantities being generated and stored, and manifests of pick-ups and deliveries to licensed treatment/storage/disposal facilities. The Federal Resource Conservation and Recovery Act also identifies standards for treatment, storage, and disposal. The Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law regulations are enforced by the California EPA, Department of Toxic Substances Control, County of Los Angeles Department of Health, Los Angeles County Fire Department, and State Division of Occupational Safety and Health.

(c) California Hazardous Waste Source Reduction and Management Review Act of 1989 (Senate Bill 14)

Senate Bill 14 requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reduction alternatives. This Act, administered by the Department of Toxic Substances Control, does not apply to non-typical hazardous waste (such as asbestos and polychlorinated biphenyls).

(d) California Department of Toxic Substances Control Hazardous Waste Reports

Both the Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law require the preparation of Hazardous Waste Reports by
hazardous waste generators for submittal to the Department of Toxic Substances Control which identify the nature and quantity of the hazardous waste being generated, along with the storage/treatment/disposal techniques being used. Requirements are enforced via the filing of biennial reports with the Department of Toxic Substances Control.

(e) California Uniform Fire Code

The California Uniform Fire Code regulates the type, configuration, and quantity of hazardous materials that may be stored within structures or in outdoor areas and hazardous waste storage facilities. Requirements are enforced via regular site inspections by the Los Angeles County Fire Department and City of Los Angeles Fire Department and the issuance of notices of violation in cases of noncompliance.

(f) California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) 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, Assembly Bill 939 requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. Assembly Bill 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by Assembly Bill 939 past the year 2000.

Assembly Bill 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 the goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of Assembly Bill 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 Integrated Waste Management Board to update their progress toward the Assembly Bill 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).489

489 California Public Resources Code, §40050 et seq.
(2) County Regulatory Framework

Within the County of Los Angeles, solid waste management is governed by several Countywide plans including the Countywide Integrated Waste Management Summary Plan, the Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County, the Countywide Siting Element, and the County Green Building Standards, each of which is discussed below.

(a) Countywide Integrated Waste Management Summary Plan

In accordance with the requirements of Assembly Bill 939, the County Department of Public Works prepared the Countywide Integrated Waste Management Summary Plan, which received approval by the County Board of Supervisors, the California Integrated Waste Management Board, and the Sanitation Districts of Los Angeles County Board of Directors, representing 88 cities in Los Angeles County, in 1999. As required by State law, the purpose of the Countywide Integrated Waste Management Summary Plan is to establish Countywide goals and objectives for integrated waste management; describe the Countywide system of governmental solid waste management infrastructure; establish an administrative structure for maintaining the Countywide Integrated Waste Management Summary Plan; describe the current system of solid waste management in the cities and unincorporated County; summarize the types of programs planned in the individual jurisdictions’ Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Nondisposal Facility Elements; and establish an administrative structure for preparing and maintaining the Countywide Integrated Waste Management Summary Plan. The goals, policies, and objectives presented in the Countywide Integrated Waste Management Summary Plan are aimed at reducing, recycling, diverting, and marketing solid waste generated within Los Angeles County.490

The County is currently in the process of revising the Countywide Integrated Waste Management Summary Plan and the Countywide Siting Element, a process which is estimated to be completed in 2011.491

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(b) Countywide Siting Element

In accordance with the requirements of Assembly Bill 939, the County Department of Public Works prepared the Countywide Siting Element as part of the Countywide Integrated Waste Management Summary Plan in 1997 to identify how the County and cities within the County will address the need for 15 years of disposal capacity to safely handle solid waste generated in the Los Angeles region which cannot be reduced, recycled, or composted. The Countywide Siting Element, a part of the Countywide Integrated Waste Management Summary Plan, establishes goals, policies, and guidelines for the proposed planning and siting of solid waste transformation and land disposal facilities on a Countywide basis.\(^{492}\)

As discussed above, the County is currently in the process of revising the Countywide Integrated Waste Management Summary Plan and the Countywide Siting Element, a process which is estimated to be completed in 2010. As part of this revision process, the County will be evaluating possible updates to the Countywide Siting Element’s goals and policies, promoting the development of alternative technology facilities, promoting the development of necessary infrastructure, and removal of Elsmere Canyon and Blind Canyon Landfills from the list of potential new landfill sites.\(^{493}\)

(c) County Source Reduction and Recycling Element

In accordance with the requirements of Assembly Bill 939, the County Department of Public Works prepared the Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County in 1993 to demonstrate how the unincorporated areas of the County would meet the mandatory waste diversion goals of 25 percent by 1995 and 50 percent by 2000, as projected based on 1990 waste generation rates. The Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County includes the following components: solid waste generation study and analysis; source reduction; recycling; composting; special waste; education and public information components; disposal facility capacity; funding; and integration.\(^{494}\)


(d) County Green Building Standards

In accordance with Ordinance No. 2008-0065 (approved November 18, 2008), Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the Los Angeles County Code were amended to include the Los Angeles County Green Building Standards, which seek to increase the amount of solid waste diverted from landfills during construction activities for qualified development projects constructed after January 1, 2009. Specifically, as required under Section 22.52.2130 of the Los Angeles County Code, a minimum of 65 percent of non-hazardous construction and demolition debris by weight from all residential projects containing at least five dwelling units regardless of gross floor area, or from hotels/motels, lodging houses, non-residential, and mixed-use buildings with a gross floor area of at least 10,000 square feet shall be recycled and/or salvaged for reuse. When a project consists of any of these qualified types of development projects, the requirements of Section 22.52.2130 supersede Section 20.87.040 of the Los Angeles County Code, which requires that at least 50 percent of all construction and demolition debris be recycled, unless a lower percentage is approved by the County’s Director of Public Works or his/her authorized representative.

(3) City Regulatory Framework

Within the City of Los Angeles, solid waste management is governed by several Citywide plans including the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles Source Reduction and Recycling Element, the Solid Waste Integrated Resources Plan, the General Plan Framework Element, the Solid Resources Infrastructure Strategy Facilities Plan, the RENEW LA Plan, and the City of Los Angeles Municipal Code, each of which is discussed below.

(a) City Solid Waste Management Policy Plan and Source Reduction and Recycling Element

The City of Los Angeles Solid Waste Management Policy Plan, adopted in November 1994, is the long range solid waste management policy plan for the City, while the City of Los Angeles Source Reduction and Recycling Element, updated in 2001, is the strategic action policy plan for diverting solid waste from landfills. The objective of the City of Los Angeles Solid Waste Management Policy Plan is to reduce at the source or recycle a minimum of 50 percent of the City’s waste by 2000, or as soon as possible thereafter. The City of Los Angeles Solid Waste Management Policy Plan calls for the disposal of the remaining waste in local and possibly remote landfills. The City of Los Angeles Solid Waste Management Policy Plan establishes a Citywide diversion objective of 70 percent by
The City of Los Angeles Solid Waste Management Policy Plan provides direction for solid waste management and integrates all facets of solid waste management planning. It ensures that disposal practices do not conflict with diversion goals. It also serves as an umbrella document for the City of Los Angeles Source Reduction and Recycling Element as well as other Citywide solid waste management planning activities.

The following five goals of the City of Los Angeles Solid Waste Management Policy Plan reflect the importance of source and materials recovery to the success of the plan and, therefore, the intent of the City to follow state regulations:

- **Maximum Waste Diversion:** The goal is to create an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes waste requiring disposal.

- **Adequate Recycling Facility Development:** To expand the siting of facilities that enhance waste reduction, recycling, and composting throughout the City beyond the current limits of the zoning code in ways that are economically, socially, and politically acceptable.

- **Adequate Collection, Transfer, and Disposal of Mixed Solid Waste:** The City shall ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed in a manner that minimizes adverse environmental impacts.

- **To develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.**

- **The City shall operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.**

The City surpassed the State-mandated 50 percent diversion rate for the year 2000 and achieved a diversion rate of 56 percent in 2005. In addition, in 1999, the Mayor

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495 The 70 percent diversion objective is a Citywide objective that would be met by the City of Los Angeles implementing policies and programs. Individual development projects would contribute to achieving this objective via compliance with those policies and programs the City chooses.

directed City departments to develop strategies to achieve the Citywide recycling goal of 70 percent by 2020.497

The City’s Source Reduction and Recycling Element serves as a guidance document and strategic action plan for diverting solid waste from landfills. The Source Reduction and Recycling Element provides a 10-year programmatic plan for solid waste diversion objectives between 1990 and 2000, in accordance with the requirement of AB 939. It is based on an ongoing evaluation of programs and waste analysis. The plan establishes diversion objectives for specific programs and targeted generators that, in combination, could enable the City to exceed the 1995 and 2000 diversion objectives of the City of Los Angeles Solid Waste Management Policy Plan. It also presents an analysis of the projected 15-year disposal capacity requirements for the City of Los Angeles based on achieving the 1995 and 2000 diversion objectives of the Source Reduction and Recycling Element and, with continual increased diversion, the City of Los Angeles Solid Waste Management Policy Plan long-term diversion objectives.

Guidance for, and implementation of, the solid waste diversion programs identified in the Source Reduction and Recycling Element are administered by the City of Los Angeles Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division.

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

The City of Los Angeles Department of Public Works, Bureau of Sanitation, is currently in the process of preparing the City of Los Angeles Solid Waste Integrated Resources Plan, which is a 20-year master plan to reduce waste, increase recycling, and manage trash in the City in the year 2030. The goal of the City of Los Angeles Solid Waste Integrated Resources Plan is to develop a master plan that will detail the policies, programs, infrastructure, regulations, incentives, new green jobs, technological innovation, and financial strategies to lead the way for Los Angeles to become a zero waste city.498 The City of Los Angeles Solid Waste Integrated Resources Plan process is in the very early stages of development and the City is currently in the process of detailing potential guiding principles to achieve zero waste. Although the City of Los Angeles Solid Waste Integrated Resources Plan is a long-term overarching plan to manage solid resources, it will also encompass all of the solutions and programs currently in place within the City by addressing all solid waste generators within the City, including residential, commercial, industrial, and institutional uses. In addition, the City of Los Angeles Solid Waste Integrated Resources Plan process will identify the number, types, and size of new solid


waste disposal facilities that the City will need in the future. The City expects to have a
draft of the SWIRP completed by 2010.

(c) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element is a strategy for long-
term growth that sets a Citywide context to guide the update of the community plans (or the
Land Use Element of the General Plan) and Citywide General Plan elements. The City of
Los Angeles General Plan Framework Element responds to State and Federal mandates to
plan for the future. In planning for the future, the City of Los Angeles uses population
forecasts provided by SCAG. The City of Los Angeles General Plan Framework Element
supports Assembly Bill 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.”499 Source reduction programs
encouraged in the City of Los Angeles General Plan Framework Element include home
composting, recycling programs such as the Curbside Recycling Program, and composting
programs. The City of Los Angeles General Plan Framework Element suggests that for
these programs to succeed, the City should site businesses at appropriate locations within
its borders that handle, process, and/or manufacture recyclable commodities to allow a full
circle recycling system to develop. It also discusses how Recycling Market Development
Zones and other development zone areas should be utilized to bring these beneficial
businesses into Los Angeles, and suggests that development and support of recyclable
materials markets is one of the City’s challenges in the years ahead.500 The City of Los
Angeles General Plan Framework Element also addresses the means for dealing with the
solid waste remaining after diversion, for which the City will have a continuing need for
solid waste transfer and disposal facilities. It states that the capacity of the landfills located
in Los Angeles is very limited, and that more transfer facilities will be needed to transfer
waste from the collection vehicles and transport it to other, more remote landfill facilities.
The City of Los Angeles General Plan Framework Element acknowledges that capacity
must be provided for the waste collected by both City agencies and private collection
companies and identifies several landfill disposal facilities that may be accessed by truck.
The City of Los Angeles General Plan Framework Element also identifies other landfill
disposal facilities that would require the City to ship its solid waste by train.

499 City of Los Angeles, Department of City Planning, Citywide General Plan Framework, August 2001,
page 9-11.
500 The Recycling Market Development Zone is a California Integrated Waste Management Board program
with local jurisdictional assistance that combines recycling with economic development to fuel new
businesses, expand existing ones, create jobs, and divert waste from landfills. This program provides
loans technical assistance, and free product marketing to businesses that use materials from the waste
stream to manufacture their products. Webpage: http://www.ciwmwb.ca.gov/RMDZ/.
(d) City Solid Resources Infrastructure Strategy Facilities Plan

In its efforts to reach Assembly Bill 939 goals and conform to the City of Los Angeles General Plan Framework Element, the City’s Bureau of Sanitation prepared the Solid Resources Infrastructure Strategy Facilities Plan in 2000, which outlines several objectives, including, but not limited to, the following:

- Develop a transfer facility and/or recycling center in the Central Los Angeles Area;
- Continue to research and develop the use of Material Recovery Facilities to preprocess all residual waste prior to delivery to a disposal site; and
- Develop a comprehensive and continual public education and community outreach program designed to educate and inform the public about the City’s solid resources programs and strategies.501

In addition to the preceding list of objectives, the Bureau of Sanitation also operates programs such as bulky item pick-ups, E-waste collection events, and curbside recycling. The Curbside Recycling Program collects recyclables from all single-family homes in the City, but does not provide service to multi-family buildings of four units or more. However, the Bureau of Sanitation conducted a Multi-Family Recycling Pilot Program involving five buildings and 76 units in Council District 8 during 2005. The Bureau of Sanitation is currently looking at ways to provide recycling services for the approximately 650,000 multi-family residences in the City.502

(e) RENEW LA Plan

In March 2006, the City Council adopted RENEW LA, a 20-year plan with a primary goal to shift from waste disposal to resource recovery, resulting in “zero waste” and an overall diversion level of 90 percent. The “blueprint” of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them 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 plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.


(f) *Los Angeles Municipal Code*

Solid waste recycling within the City of Los Angeles is also addressed via provisions set forth in various sections of the City of Los Angeles Municipal Code which were enacted via the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687, August 6, 1997). In addition to setting forth standards for the location and operating characteristics of recycling centers and processing facilities, the Ordinance also sets forth requirements for the inclusion of recycling areas within individual development projects. In accordance with the Space Allocation Ordinance, all new construction development projects, multiple family residential development projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more shall provide an adequate recycling area or room for collecting and loading recyclable materials.

Pursuant to Section 57.08 of the City of Los Angeles Municipal Code, all businesses that handle hazardous materials in excess of 500 pounds or 55 gallons would be required to file a Hazardous Materials Release Response Plan and Inventory Program and to prepare and submit a Business Plan to the Los Angeles Fire Department, which includes the following elements:

- Annual inventory of hazardous materials used, including the following:
  - A listing of the chemical name, common names, and general chemical and mineral composition by probable maximum and minimum concentrations of every hazardous substance or chemical product handled;
  - The maximum amount of each hazardous material handled at any one time over the course of the year;
  - Sufficient information on how and where the hazardous materials are handled to allow fire, safety, health, and other appropriate personnel to prepare adequate emergency responses in the case of potential releases of the hazardous materials;
  - The Standard Industrial Classification Code number of the business, if applicable; and
  - The name and phone number of a contact person to assist emergency personnel in the event of an emergency during non-business hours.

- Emergency response procedures for release or threatened release of hazardous materials, including the following:
  - Immediate notification of local emergency response personnel, the Los Angeles Fire Department, the State Office of Environmental Safety, and other appropriate persons on-site;
- Identification of local emergency medical assistance in case of accidents;
- Mitigation, prevention, or abatement of hazards to persons, property, or the environment;
- Immediate notification and evacuation of the facility; and
- Identification of mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquakes.

- A training program which shall, at a minimum, include:
  - Methods for safe handling of hazardous materials;
  - Procedures for coordination with local emergency response organizations;
  - Controlled use of emergency response equipment and supplies; and
  - Provisions to ensure that appropriate personnel receive initial and refresher training.

As discussed above, additional regulations pertaining to hazardous waste are also set forth under federal laws, including the Federal Resource Conservation and Recovery Act, the Comprehensive Environmental Response, Compensation, and Liability Act, the Superfund Amendments and Reauthorization Act, and federal and California Occupational Safety and Health Administration regulations. Please see Section IV.M., Environmental Safety, of this Draft EIR for additional information.

b. Disposal Locations

(1) Landfills

Waste disposal sites or landfills serving the City and County of Los Angeles are operated by the County of Los Angeles as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. The great majority of municipal solid waste disposed of in Los Angeles County is disposed at Class III landfills (municipal solid waste landfills), which are facilities for non-hazardous, household waste. Unclassified or inert landfills are defined as facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Hazardous wastes are disposed of at Class I landfills. The City of Los Angeles does not own or operate any landfill facilities. As such, all solid waste generated within the City is disposed of at privately-owned landfill facilities.

The County of Los Angeles Department of Public Works, in May 2009, issued the County Integrated Waste Management Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element, which serves as the primary planning document for the County’s waste disposal needs, including solid waste generated
throughout the City of Los Angeles. Solid waste in the County area and the majority of the
cities is currently being collected by over 250 private waste haulers. In most cases, the
waste is hauled directly to the major Class III landfills, with the remainder being taken to
transfer stations, and resource recovery centers. In addition, there are two waste-to-
energy facilities that accept solid waste in Los Angeles County: the Commerce Refuse-to-
Energy Facility (permitted to accept 1,000 tons per day of industrial and mixed municipal
waste) and the Southeast Resource Recovery Facility (permitted to accept 2,240 tons per
day of green materials and mixed municipal waste). Furthermore, the City of Los
Angeles Hyperion Treatment Plant and Terminal Island Water Reclamation Plant operate
waste-to-energy facilities. However, these facilities generate electricity from the digestion
of sewage and not from solid waste collected as part of municipal solid waste stream.
According to the County Integrated Waste Management Plan 2007 Annual Report on the
Countywide Summary Plan and Countywide Siting Element, residents and businesses of
Los Angeles County disposed of approximately 8,898,527 tons of waste at in-County Class
III landfills, 521,620 tons of waste at transformation facilities, 79,106 tons at unclassified
landfills (inert waste only), and 1,980,421 tons of waste were exported to out-of-county
Class III landfills. These disposal quantities total approximately 11,479,674 tons of waste
over the year.

Landfill availability is limited by several factors, including: (1) restrictions to accepting
waste generated only within a landfill’s particular jurisdiction and/or watershed boundary;
(2) tonnage permit limitations; (3) types of waste; and (4) operational constraints.
Remaining landfill capacity in facilities located within Los Angeles County is declining, and,
as a result, there continues to be a shortage of solid waste disposal capacity within Los
Angeles County itself. Based on the results of the County Integrated Waste Management
Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element,
the remaining permitted Class III landfill capacity in the County was estimated at
91.43 million tons as of December 31, 2007, which, based on the average 2007 disposal
rate of 28,521 tons per day at Class III landfills, would be exceeded by 2013. However, the
remaining permitted combined unclassified landfill capacity in the County for 2007 was
estimated at 51.05 million tons (34.03 million cubic yards). In addition, the solid waste
disposal needs of both the City and the County are increasingly being met by landfill
facilities located outside of Los Angeles County with approximately 17.3 percent of the
County’s solid waste disposal needs being met by such facilities in 2007. Due to the
difficulties of establishing new landfills or expanding existing landfills, it is forecasted that

503 The City of Los Angeles Department of Public Works, Bureau of Sanitation. City of Los Angeles Solid
Waste Planning Background Studies Summary Report. January 2006. Available at:

504 County of Los Angeles, Department of Public Works, Environmental Programs Division, Los Angeles County
increasing amounts of the County’s solid waste disposal will occur at out-of-County landfills in the future.\textsuperscript{505}

The County Integrated Waste Management Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element provided an analysis under seven landfill scenarios for the County that range from status quo (i.e., no new landfills or expansions of existing landfills in the County) to scenarios in which the County successfully permits and develops all in-County landfill expansions and utilizes alternative technologies and out-of-County disposal facilities. Based on this analysis, the County Integrated Waste Management Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element concludes that while the County would be unable to adequately provide for the solid waste disposal needs of all 88 cities and the unincorporated County areas through the 15-year planning period under current conditions (status quo scenario), the County would be able to provide for its 15-year disposal needs by successfully permitting and developing all in-County landfill expansions and utilizing alternative technologies and out-of-County disposal facilities.

\textit{(a) Landfills Serving the Project Site}

In 2008, solid waste from the Project Site was transported for disposal to the Chiquita Canyon and Puente Hills Landfills by private waste haulers under contract to the Applicant.

The Chiquita Canyon Landfill, owned and operated by Republic Services of California, covers 135 acres of land located north of Valencia in an unincorporated area of Los Angeles County. As of May 2009, the Chiquita Canyon Landfill had a remaining permitted capacity of 9.6 million tons with a daily permitted intake of 6,000 tons and 30,000 tons per week.\textsuperscript{506} The Chiquita Canyon Landfill currently accepts an average of 4,946 tons per day and, therefore, has a remaining daily capacity intake of 1,054 tons (see Table 162 on page 1898). Chiquita Canyon Landfill is currently permitted through 2019; however, in 2004 the landfill owner/operator submitted a Conditional Use Permit application for a proposed horizontal and vertical expansion increase in disposal area of 98 acres (32 million tons). This CUP is currently being reviewed. Under the Conditional Use Permit, the daily disposal capacity would remain at 6,000 tons per day. An amendment to the

\textsuperscript{505} Ibid.

Conditional Use Permit was recently approved by the County of Los Angeles thereby allowing operations at the facility to occur through year 2019.\textsuperscript{507}

The Puente Hills Landfill, located in an unincorporated area of Los Angeles County near the City of Santa Fe Springs, is operated by the County Sanitation Districts of Los Angeles County. The landfill is prohibited from accepting wastes from any city having a population of more than 2,500,000 and from any county having a population of more than 2,000,000. In 2003, the Sanitation Districts submitted and the Integrated Waste Board approved a Conditional Use Permit for an expansion that would increase the life-span of the landfill by 10 years (i.e., 2013) and would allow a maximum daily intake of 13,200 tons per day (72,000 tons per week). As of May 2009, the Puente Hills Landfill accepted an average of 12,040 tons per day. Therefore, the Puente Hills Landfill has a remaining daily capacity intake of 1,160 tons per day (see Table 162). As of December 31, 2007, the total remaining permitted capacity of the landfill is approximately 24.8 million tons.\textsuperscript{508}

\begin{table}[ht]
\centering
\begin{tabular}{|l|c|c|c|c|}
\hline
Landfill Facility & Estimated Closure Date & Permitted Daily Intake (tons per day) & Average Daily Intake (tons per day) & Remaining Permitted Daily Intake (tons per day) \\
\hline
Puente Hills Landfill & 2013 & 13,200 & 12,040 & 1,160 \\
Chiquita Canyon Landfill & 2019 & 6,000 & 4,946 & 1,054 \\
Antelope Valley Recycling & Disposal Facility & 2017 & 3,200 & 1,132 & 2,068 \\
Lancaster & Recycling Facility & 2013 & 1,700 & 1,337 & 363 \\
Sunshine Canyon Landfill & 2033 & 12,100 & 5,742 & 6,358 \\
\hline
Total Remaining Intake (tons per day) & & & & 11,003 \\
\hline
\end{tabular}
\caption{Landfill Capacity and Intake}
\end{table}


\textsuperscript{508} Ibid.
(b) Additional Landfill Disposal Options

The Sunshine Canyon Landfill is owned and operated by Browning-Ferris Industries, which purchased the landfill from the City in 1978. The landfill serves both the County and City and is divided into the “County side” and the “City side.” In 1991, the operating permit for the landfill expired and operations ceased. The County Board of Supervisors issued a Conditional Use Permit in 1993 to allow the continued operation at the Landfill on the County portion of the site. As one of the conditions of the permit, Browning-Ferris Industries had to obtain approval from the City to operate in its half of the landfill thereby establishing a City/County landfill. In 1996, landfill operations on the County side of the landfill resumed with an approximate 6,600 tons per day capacity with an expected 10-year life span. The City portion of the Sunshine Canyon Landfill commenced operation on July 28, 2005, with an approximate capacity of 5,500 tons per day. On December 23, 2008, the City and County entered into a Memorandum of Understanding to allow coordination of specified land use requirements for more efficient administration of the landfill. On December 31, 2008, operations of the Sunshine Canyon County Landfill and the Sunshine Canyon City Landfill were combined into what is known as the Sunshine Canyon City/County Landfill. The combined City/County Landfill will provide approximately 24 years of waste disposal capacity from January 1, 2009, at a maximum 12,100 tons per day. As of December 31, 2007, the Sunshine Canyon City/County Landfill had approximately 13.1 million tons of remaining capacity and a permitted maximum daily intake of 12,100 tons per day. Sunshine Canyon City/County Landfill currently accepts approximately 5,742 tons per day.

Although the County side of the Sunshine Canyon Landfill is seeing continued operation from the approved Conditional Use Permit, in March 2006, the City Council voted to divert disposal of 600 tons of solid waste per day from the Sunshine Canyon Landfill to landfills located outside the City limits. As such, it is possible that all or a portion of Sunshine Canyon Landfill’s remaining capacity would not be available to new development in the City. In this event, other options for landfill disposal for City-generated solid waste include the use of transfer stations that would collect, consolidate, transport, and dispose of solid waste at available landfills. A transfer station is a waste facility used to transfer waste from collection vehicles to a bulk haul vehicle in order to achieve long-distance transportation efficiency. Given the location of the Project Site, the nearest and most likely transfer stations to serve the Project Site would be in Sun Valley, approximately eight miles to the north of the Project Site and directly served by the Ventura Freeway (SR-170). The transfer stations in Sun Valley that could be used by the Project include American Waste

Industries, Sun Valley Paper Stock Materials Recovery Facility and Transfer Station, and Community Recycling/Resource Recovery, Inc. Waste collected at these transfer stations is transported to the Antelope Valley Recycling & Disposal Facility in Palmdale or the Lancaster Landfill & Recycling Center located in the City of Lancaster.

The Antelope Valley Recycling & Disposal Facility is located in the City of Palmdale and is permitted to receive 1,400 tons of solid waste per day for Landfill I and 1,800 tons per day for Landfill II, for a combined total of 3,200 tons per day. As of 2007, the facility had a remaining disposal capacity of 8.7 million tons, with an average daily disposal of 1,132 tons.\textsuperscript{510} In 2005, Waste Management, Inc. filed an application with the City of Palmdale to add an additional 8.96 million pounds of capacity to the landfill, which would increase the maximum intake to 5,000 tons per day. An EIR is currently being prepared to address the proposed expansion of this facility to accommodate the combined total of 5,000 tons per day. The anticipated completion of the expansion is 2010.\textsuperscript{511} The Lancaster Landfill & Recycling Facility is located in the City of Lancaster and is permitted to receive 1,700 tons of waste daily and currently receives approximately 1,337 tons per day. As of 2007, this facility had remaining disposal capacity of 13.8 million tons. The Lancaster Landfill and Recycling Center is proposing to expand its maximum capacity from 1,700 tons per day to 3,000 tons per day. An EIR for this expansion is currently being prepared. Estimated remaining lives of these facilities are 8 years and 4 years from 2009, respectively.\textsuperscript{512}

Inert landfills serving the County include Peck Road Gravel Pit which has a maximum daily intake of 1,210 tons and a total remaining permitted inert waste capacity of approximately 7.8 million tons as of December 31, 2007. While the Peck Road Gravel Pit has no official closure date, based on the current maximum daily disposal of 1,210 tons, the remaining permitted inert waste capacity at this landfill would be exhausted in approximately 2028 (as of December 31, 2007). This estimate is conservative in that the Peck Road Gravel Pit accepted an average of only 0.75 tons per day in 2007. Based on this data, it is concluded that there is no anticipated shortfall in disposal capacity for inert waste within the County.\textsuperscript{513}


\textsuperscript{511} Antelope Valley Recycling & Disposal Facility, personal communication, January 18, 2008.


\textsuperscript{513} Ibid.
(2) Household Hazardous Waste Disposal

(a) City of Los Angeles

The City operates a Household Hazardous Waste Collection Program in cooperation with the County of Los Angeles Department of Public Works. The program is a way for private residents to safely dispose of household chemicals such as household cleaning products, paint substances, automotive products, pool chemicals, fertilizers, pesticides, batteries, and fluorescent light bulbs. City and County residents can bring their Household Hazardous Waste to one of a number of permanent collection centers known as “S.A.F.E. Centers” located throughout the City, or to mobile “Hazmobile” collection sites. These mobile collection sites are held at various locations throughout the City and County, each remaining in the same location for two to three days. These sites are staffed with employees trained in hazardous waste handling who safely unload residents’ waste into trucks and trailers onsite.514

(b) County of Los Angeles

In addition to the cooperative agreement between the City and County allowing all County residents to dispose of household hazardous waste at City collection sites, the County Department of Public Works also operates its own Household Hazardous Waste Collection Events in conjunction with the Los Angeles County Sanitation Districts. Similar to the City’s Hazmobile, the County’s Collection Events are mobile events that are scheduled periodically in different areas throughout the County.515

(3) Recycling Facilities

(a) City of Los Angeles

The City of Los Angeles Department of Public Works Bureau of Sanitation, Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and composting programs in the City. The City of Los Angeles Department of Public Works Bureau of Sanitation, Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, oversees the City’s recycling program, manages the Household Hazardous Waste program, and helps create markets for recyclable materials.516 The City of Los Angeles Department of Public Works Bureau of


Sanitation, Solid Resources Citywide Recycling Division provides information to public and private sectors regarding construction waste diversion through the publication of the Construction and Demolition Recycling Guide, 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 Construction and Demolition Recycling Guide also provides listings by materials accepted (i.e., wood waste, scrap metal, drywall, etc.) so that developers and contractors can tailor their recycling choices to suit different project needs.

(b) County of Los Angeles

The County of Los Angeles Department of Public Works’ Smart Business Recycling Program is designed to help businesses located in unincorporated Los Angeles County reduce the amount of trash they generate. The County provides free assistance to businesses to help set up or expand existing waste prevention and recycling programs, as well as lists of recycling centers where businesses and individuals can recycle their waste.517 In order to provide more information to public and private sectors regarding construction waste diversion, the County’s Smart Business Recycling Program publishes a Construction and Demolition Debris Recycling Guide.518 Additional information on recycling programs and facilities in Los Angeles County is also provided by the Sanitation Districts of Los Angeles County519 and the California Integrated Waste Management Board.520

While the final choice in recycling facility rests with the Applicant, there are several facilities in the vicinity of the Project Site that include: the Alfonso Garcia Recycling/Rancho Market at 5520 W. Sunset Boulevard (1.9 miles); Laur Metals Co./Jons Market at 1601 N. Vermont Avenue (1.9 miles); SoCal 4 at 7564 Santa Monica Boulevard (2.4 miles); TOMRA Pacific Inc./Vons at 1110 W Alameda Avenue (3.2 miles); and Laur Metals Co./Busy Bee Market at 825 N. Virgil Avenue (3.3 miles).521

c. Existing Conditions

Within both the City and the County of Los Angeles, solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. In the City, waste generated by all commercial sources, industrial sources and multi-family residential buildings greater than four units is collected by private contractors. Construction waste is also collected by private contractors. Single-family residential and limited multi-family residential refuse in the City is collected by the City Department of Public Works, Bureau of Sanitation. Generally, all waste in the unincorporated County is collected by private haulers.

(1) Existing Solid Waste Generation

The solid waste generated at the Project Site currently consists of a wide range of commercial wastes including but not limited to production trash, office paper, food waste, wood, corrugated cardboard, and metals. Solid waste is collected from the Project Site by private waste handlers and processed at off-site waste reclamation centers, with the ultimate disposal of non-recyclable waste at the regional landfills discussed above. The Applicant’s two primary waste haulers are NASA Services, Inc., which hauls waste for all Universal CityWalk activities and some theme park activities within the existing Entertainment Area to the Puente Hills Landfill, and Crown Disposal, which hauls waste for some theme park uses within the existing Entertainment Area and most uses within the existing Studio, Business, and Back Lot Areas to the Chiquita Canyon and Puente Hills Landfills. (See also the recycling discussion later in this Section.) The transport of solid waste off the Project Site currently occurs via the existing internal roadway system with off-site ingress/egress occurring via studio gates located along Lankershim Boulevard and at Lakeside Plaza Drive. As shown in Table 163 on page 1904, based on annual statements provided by each respective service provider, approximately 12,405 tons of waste was generated at the Project Site in 2007, or an average of approximately 33.99 tons per day. However, as a substantial portion of the total waste generated was recycled, only 5,659 tons (an average of approximately 15.50 tons per day) of Project Site waste was sent to landfills in 2007. Compared with the daily permitted intake at landfills serving the Project Site in 2007, existing Project Site solid waste comprised approximately 0.76 percent of the remaining 2,020 tons of daily capacity of the two landfills that serve the Project Site.

(2) Existing Recycling Programs

The Applicant has developed comprehensive collection and recycling programs to reduce the amount of materials generated at the Project Site that require landfill disposal. These include both the collection of solid waste by the solid waste hauler which is then sorted for recyclables at an off-site location, as well as pre-sorting of recyclables on-site for pick-up by recycling haulers. NASA Services, Inc. and Crown Disposal, as discussed
above, manage the hauling of solid waste generated at the Project Site. These vendors transport solid waste to an off-site location where it is sorted for recyclables prior to reaching the landfill. Weyerhaeuser, Kramer Metals, and SoCal Recycling specialize in the recycling of pre-sorted recyclables. Weyerhaeuser picks up pre-sorted paper, bottles, and cans from offices throughout the existing Studio Area, all of which is recycled. Crown Disposal transports scrap metals from the on-site tram garage and metal shop to Kramer Metals, where it is recycled. SoCal Recycling picks up glass bottles from the Universal Studios Hollywood theme park and the Gibson Amphitheater.

As shown in Table 163, of the two primary solid waste haulers that serve the Project Site, NASA Services, Inc. recycled approximately 52 percent of the waste it hauled from the Project Site in 2007, while Crown Disposal recycled approximately 55 percent of the waste that it hauled. Combined with the paper, cans, bottles, and scrap metal recycled by Weyerhaeuser and Kramer Metals, approximately 6,746 tons of waste, or 54 percent of all waste generated on-site, were recycled in 2007, surpassing Assembly Bill 939’s requirement of the City of Los Angeles to divert from landfill disposal 50 percent of the waste generated within the City of Los Angeles in 2000.

### Table 163

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Total Waste Generated (annual tonnage)</th>
<th>Total Waste Generated (tons/day)</th>
<th>Waste Recycled (annual tonnage)</th>
<th>Waste Recycled (tons/day)</th>
<th>Net Waste to Landfills (annual tonnage)</th>
<th>Net Waste to Landfills (tons/day)</th>
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<tr>
<td><strong>Existing Entertainment Area</strong></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>General Waste (^a)</td>
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<td>14.531506</td>
<td>2,738</td>
<td>7.501369</td>
<td>2,566</td>
<td>7.0301369</td>
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<td><strong>Studio, Business, Back Lot Areas</strong></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>General Waste (^b)</td>
<td>6,839</td>
<td>18.736986</td>
<td>3,746</td>
<td>10.263013</td>
<td>3,093</td>
<td>8.4739726</td>
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<td>Studio Paper, Cans, Bottles (^c)</td>
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<td>162</td>
<td>0.4438356</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Scrap Metals (^d)</td>
<td>100</td>
<td>0.2739726</td>
<td>100</td>
<td>0.2739726</td>
<td>0</td>
<td>0</td>
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<tr>
<td><strong>Totals (2007)</strong></td>
<td>12,405</td>
<td>33.986299</td>
<td>6,746</td>
<td>18.482189</td>
<td>5,659</td>
<td>15.504109</td>
</tr>
</tbody>
</table>

\(^a\) NASA Services, Inc. manages all of the Entertainment Area’s Universal CityWalk solid waste and some of the theme park solid waste, including the sorting of solid waste for recyclables at an off-site location, with ultimate disposal of non-recyclable waste at the Puente Hills Landfill.

\(^b\) Crown Disposal manages most of the solid waste for the Studio, Business, and Back Lot Areas and some of the Entertainment Area’s theme park solid waste, including the sorting of solid waste for recyclables at an off-site location, with ultimate disposal of non-recyclable waste at the Chiquita Canyon, and Puente Hills Landfills.

\(^c\) Weyerhaeuser picks up pre-sorted paper, cans, and bottles within the Studio Area for recycling; and SoCal Recycling picks up glass bottles from the Universal Studios Hollywood theme park and the Gibson Amphitheater.

\(^d\) Kramer Metals recycles scrap metals transported by Crown Disposal from the Applicant’s tram tour and metal shop.

(3) Existing Hazardous Waste Use and Disposal

Currently, a wide range of on-site activities involve the use (and, therefore, require the disposal) of hazardous materials including Federal Resource Conservation and Recovery Act, non-Federal Resource Conservation and Recovery Act and universal wastes. Certain on-site activities, such as movie and television production, operation of the theme park, restaurant cleaning, grounds maintenance, and support for facilities operation (i.e., air conditioning), involve the acquisition, use, storage and disposal of hazardous materials on a regular basis. No notable sources of radioactive materials are used and stored at the Project Site. Incidental radioactive materials at the Project Site include minor amounts associated with lithium-source exit lights and with an on-site X-ray machine. Generally, a majority of the hazardous materials usage and storage at the Project Site is associated with Studio and Entertainment Area operations, with much less associated with operation of the Business Area.

According to the service providers' annual statements, with the inclusion of asbestos and polychlorinated biphenyls waste, the Applicant’s total hazardous waste generation in 2007 was approximately 247,000 pounds (123.5 tons). Of this amount, approximately 13.2 tons were disposed of at a Class I designated hazardous materials landfill and approximately 5.2 tons were incinerated. Of the 13.2 tons disposed of at a Class I landfill, approximately 4.5 tons consisted of asbestos. Of the 5.2 tons incinerated, approximately 0.30 tons were considered polychlorinated biphenyls waste. Overall, all hazardous waste generated by the Applicant is disposed of at appropriate landfill facilities within 90 days after the hazardous waste is generated. The Applicant is currently in compliance with applicable Federal and State legislative programs as discussed below.

The Technicolor buildings at the Project Site are occupied by a tenant, which separately generates, accumulates, and manages its own hazardous waste. This tenant generated a total of approximately 7,200 pounds and 656 gallons of hazardous waste in 2006. Similar to the Applicant, the tenant also implements the hazardous waste management life cycle requirements, dispenses all hazardous waste from a 90-day hazardous waste accumulation area, and submits biennial Hazardous Waste Reports.

Please refer to Section IV.M, Environmental Safety, for additional information regarding the handling of hazardous waste at the Project Site.

(4) Closed On-Site Landfill

A closed landfill, listed as a Solid Waste Landfill site, is located in the central portion of the Project Site. The landfill is also listed as “closed” in the Solid Waste Information System database, which includes all active, closed, and inactive landfills. The landfill was licensed by the Los Angeles County Department of Health Services as a solid waste
disposal facility. Filling began in the late 1920s and ceased around 1980. Upon the closure of the landfill around 1980, a final soil cap cover consisting of about two to six feet of clean silty and clayey sand fill (earth fill) was been placed over the landfill area. Subsequently, roads, asphalt pavement, and buildings have been developed over approximately 50 percent of the landfill surface area. Natural vegetation covers the remaining undeveloped slope surface of the landfill site (northern portion). The closed landfill is currently in compliance with applicable regulations and programs.

See Sections IV.M, Environmental Safety, IV.G.2, Water Resources - Groundwater, and IV.F, Geotechnical, for additional discussion of the closed on-site landfill.

3. Environmental Impacts

a. Methodology

The analysis of the proposed Project’s solid waste impacts is based on the solid waste anticipated to be generated during both construction and operation of the proposed Project. The analysis examines the potential for the disposal of inert demolition and construction debris during the Project’s construction phase, and solid waste disposal during proposed Project operation within Class III landfills in the County. Any hazardous wastes generated on the Project Site would continue to be properly transported for treatment off-site at privately-owned treatment facilities (refer to Section IV.M, Environmental Safety, for additional information regarding the disposal of hazardous wastes generated by the proposed Project). The proposed Project’s solid waste generation is forecasted both for the total amount of waste generated by the Project, as well as the amount of solid waste that would actually be disposed of at a landfill (i.e., the total amount of waste minus the materials diverted from landfills via recycling, reuse, or other methods).

Anticipated solid waste generation for the proposed Project’s construction activities is determined using rates provided by the United States Environmental Protection Agency based on the amount and type of land uses proposed for demolition and construction. The total amount of solid waste generated is then divided by the time that the Project would take to construct. The results of these calculations (i.e., the Project’s construction solid waste generation) are compared with the available capacity at the landfills that currently accept construction waste from the Project Site (i.e., the Peck Road Gravel Pit), to assess the significance of the proposed Project’s solid waste generation.

Solid waste generation for the proposed Project’s operational activities is forecasted using rates provided in the City of Los Angeles Department of Public Works’ 2000 Waste Characterization & Quantification Study. The results of these calculations (i.e., the Project’s operational solid waste generation) are compared with the available capacity at
the landfills that currently accept waste from the Project Site, as well as other landfills that accept waste, to assess the significance of the proposed Project’s solid waste generation.

b. Thresholds of Significance

The City of Los Angeles CEQA Thresholds Guide (2006, page M.3-2) states that a determination of significance relative to potential solid waste impacts shall be made on a case-by-case basis, considering the following factors:

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

Based on these factors, the proposed Project would have a significant impact if:

- The Project creates a need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated solid waste.
- The Project conflicts with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles General Plan Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the City of Los Angeles Source Reduction and Recycling Element.
- The Project conflicts with solid waste policies and objectives in the County of Los Angeles Countywide Integrated Waste Management Summary Plan, County Source Reduction and Recycling Element, Countywide Siting Element, and the Los Angeles County Green Building Standards.

c. Project Design Features

The Applicant, in recognition of the importance of recycling, would incorporate several project design features targeted at reducing the Project’s solid waste generation
During Project construction as well as during long-term Project operations. Specifically, the following project design features would be implemented for the sole purpose of reducing the proposed Project’s solid waste generation during both Project construction and operations:

- During new construction a minimum of 65 percent of the non-hazardous demolition and construction debris by weight from construction of new Project buildings would be recycled and/or salvaged for reuse.

- All structures constructed established within any part of the Mixed-Use Residential Area shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins to facilitate the separation and deposit of recyclable materials;

- Primary collection bins within any part of the Mixed-Use Residential Area shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities; and

- Within any part of the Mixed-Use Residential Area, the Applicant shall continuously maintain in good order clearly marked, durable, and separate recycling bins on the same lot or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

- Solid waste generation during Project construction as well as during long-term Project operations within the Entertainment, Studio, and Business Areas will be conducted in a manner consistent with current recycling practices, including the sorting of recyclables by third party vendors.

- During occupancy and operations, the Project would have a solid waste diversion target of 65 percent of the non-hazardous waste pursuant to the proposed City and County Specific Plans.

As discussed previously in this Section, existing recycling programs divert over half of the total solid waste generated on an annual basis at the Project Site from landfills. These recycling programs would be continued, enhanced, and extended so that the proposed Project would divert from landfills 65 percent of the non-hazardous solid waste generated at the Project Site on an annual basis pursuant to the proposed City and County Specific Plans.
d. Project Impacts

(1) Construction Impacts

(a) Waste Stream

A variety of scraps and wastes would be generated during demolition, grading/site preparation, and construction activities. For the most part, each individual demolition and construction project creates a one-time impact; therefore, demolition and construction debris generation rates provided by the United States Environmental Protection Agency are based on the overall waste generated during the life of a construction project. Under the maximum allowable buildout scenario, construction associated with the proposed Project would include approximately 638,000 square feet of floor area to be demolished, and the new construction of 2,937 residential units, and approximately 2,643,000 square feet of gross non-residential (i.e., studio, office, entertainment, hotel, and retail) floor area. As shown in Table 164 on page 1910, based on the United States Environmental Protection Agency’s rates, the Project would generate approximately 62,304 tons of demolition and construction debris over the construction life cycle of the proposed Project. The proposed Project would be developed over a period of time, with Project development concluding by 2030. As it is not known precisely how much daily waste would be generated, assuming that construction would occur over 22 days each month for 21 years, the proposed Project would generate approximately 11.24 tons of solid waste per day (62,304 tons ÷ 21 years ÷ 12 months ÷ 22 days). While it is unlikely that the quantity of construction and demolition waste generated would be distributed this evenly throughout the Project’s construction period, even on peak construction days, the amount of daily construction waste would not approach the maximum daily remaining capacity at the Peck Road Gravel Pit. In addition, on-site grading activities would generate soil export that would be removed from the Project Site. However, this soil export is not included in the volume of construction waste because the soil is not landfill waste, but cover material.

Pursuant to the proposed County and City Specific Plans, during new construction a minimum of 65 percent of the non-hazardous construction and demolition debris by weight from construction of new Project buildings would be recycled and/or salvaged for reuse. Therefore, it is estimated that on an average day approximately 3.93 tons of daily construction waste would be disposed of at regional landfills throughout the duration of proposed construction. It is recognized that this forecast represents a mathematical average and the actual amount of construction debris requiring off-site transport would vary considerably over the course of the Project’s construction period.

Construction debris would primarily be classified as inert waste. Inert landfills serving the County include Peck Road Gravel Pit which, as of 2007, had a maximum daily intake of 1,210 tons and a total remaining permitted inert waste capacity of approximately...
9.7 million tons, which is anticipated to be exhausted in approximately 24 years (i.e., through approximately 2031).

The Applicant is committed to recycling practices through implementation of project design features throughout the Project’s design, construction and operations phases. Specifically, the Applicant would implement a demolition and construction debris recycling plan for all buildings constructed, with the explicit intent of requiring recycling during all phases of site preparation and building construction. Construction debris recycling facilities listed in the City or County’s Construction and Demolition Recycling Guides, as discussed above under “Environmental Setting,” may be utilized at the discretion of the Applicant. The implementation of these practices would ensure that the construction phase of the Project is consistent with the solid waste objectives and policies of the Countywide Integrated Waste Management Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County, the County of Los Angeles Green Building Standards, the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles Source Reduction and Recycling Element, the City of Los Angeles Solid Waste Integrated Resources Plan, the City General Plan Framework Element, the City Solid Resources Infrastructure Strategy Facilities Plan, the RENEW LA Plan, City of Los Angeles Municipal Code, and Los Angeles County Code. Thus, Project construction would result in a less than significant impact with regard to implementation of the City and County solid waste management policies and programs.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size (sf/du)</th>
<th>Generation Rate (tons/sf)</th>
<th>Total (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition</td>
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<td></td>
</tr>
<tr>
<td>Commercial</td>
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<tr>
<td>Construction</td>
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<tr>
<td>Residential</td>
<td>2,937 units</td>
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<td>Non-Residential (Studio, Office, Entertainment, Retail, Hotel)</td>
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<tr>
<td><strong>Total Proposed Demolition/Construction Waste Generation</strong></td>
<td></td>
<td></td>
<td><strong>62,304.071</strong></td>
</tr>
</tbody>
</table>

Notes: $sf=$square feet; $du=$dwelling unit. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.


Source: Matrix Environmental, 2010.
As discussed above, the quantity of demolition and construction waste that would be deposited in a landfill has been estimated at approximately 3.93 tons per day over the course of the 21-year construction period. Based on this forecast, the Project’s construction-related waste would represent a small percentage (0.32 percent) of the daily inert waste disposal capacity of the Peck Road Gravel Pit (i.e., 1,210 tons per day). While it is unlikely that the quantity of construction and demolition waste landfilled would be distributed this evenly throughout the 21-year construction period, even on peak construction days when the construction waste landfilled would be greater than 3.93 tons, the amount of daily waste would still represent a very small portion of the daily permitted intake at the Peck Road Gravel Pit and would not approach the maximum daily remaining capacity at the facility. As the proposed Project would not create a need for additional solid waste disposal facilities to adequately handle Project-generated inert waste, the proposed Project would result in a less than significant impact with respect to construction waste.

(b) Hazardous Waste

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 the proposed structures. Those hazardous materials that are not consumed during the construction process would require proper disposal at a licensed hazardous waste disposal facility in accordance with all of the requirements of applicable regulatory agencies, which could include the Los Angeles Fire Department, Los Angeles County Department of Public Works, Los Angeles Regional Water Quality Control Board, and/or the California Environmental Protection Agency Department of Toxic Substances Control. In addition, in the event that contaminated soils are unexpectedly encountered during the proposed grading and excavation activities, such soils may be required to be removed and disposed of in accordance with applicable federal, state and local requirements. Compliance with such requirements, outlined in detail in Section IV.M, Environmental Safety, of this Draft EIR, would reduce the potential for a Project impact associated with disposal of construction-related hazardous waste to a less than significant level.

(2) Operational Impacts

The impact of operational Project-generated solid waste on regional landfill capacity is assessed under both the proposed Project and No Annexation scenario due to the fact that solid waste generated within the City of Los Angeles is sent to different landfill facilities than solid waste generated within unincorporated portions of Los Angeles County.

Solid waste generation for the proposed Project was estimated based on solid waste generation factors provided by the City of Los Angeles Department of Public Works. As shown in Table 165 on page 1912, prior to any reduction to account for recycling, the
The proposed Project would generate an increase of approximately 23.67 tons of solid waste per day over existing conditions at the Project Site. As discussed previously in this Section, the Project Site currently recycles approximately 50 percent of its waste. As existing recycling programs are planned to be extended to the operation of the Project and expanded to increase their effectiveness, the proposed Project would recycle 65 percent of its waste (e.g., paper, cans, bottles, scrap metals, etc.) pursuant to the proposed City and County Specific Plans, thereby diverting this waste from landfills. Therefore, the actual amount of additional waste generated by the proposed Project that would be disposed of at landfills is forecasted to be approximately 8.28 tons per day.

### Table 165
Proposed Project Daily Operational Waste Generation

<table>
<thead>
<tr>
<th>Proposed Land Use</th>
<th>Net New Development (unit)</th>
<th>Daily Generation Rate (tons/unit)</th>
<th>Total Waste Generated (tons/day)</th>
<th>Waste Recycled (tons/day)</th>
<th>Net Waste to Landfills (tons/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City Jurisdiction</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Studio</td>
<td>149 emp</td>
<td>0.0035385/emp</td>
<td>0.527</td>
<td>0.343</td>
<td>0.184</td>
</tr>
<tr>
<td>Studio Office</td>
<td>623 emp</td>
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<td>0.887</td>
<td>0.576</td>
<td>0.311</td>
</tr>
<tr>
<td>Multi-Family Residences</td>
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<td>0.0025479/du</td>
<td>7.483</td>
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<td>2.619</td>
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<tr>
<td>Neighborhood-Serving Retail</td>
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<td>0.574</td>
</tr>
<tr>
<td>Community Facilities</td>
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<td>0.491</td>
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<tr>
<td>Entertainment</td>
<td>(163) emp</td>
<td>0.0047616/emp</td>
<td>(0.776)</td>
<td>(0.504)</td>
<td>(0.272)</td>
</tr>
<tr>
<td>Child Care Facilities</td>
<td>(40) emp</td>
<td>0.0019231/emp</td>
<td>(0.077)</td>
<td>(0.050)</td>
<td>(0.027)</td>
</tr>
<tr>
<td><strong>Total Solid Waste (City jurisdiction)</strong></td>
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<td></td>
<td><strong>10.1781948</strong></td>
<td><strong>6.6158266</strong></td>
<td><strong>3.5623682</strong></td>
</tr>
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<td><strong>County Jurisdiction</strong></td>
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<tr>
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<td>0.998</td>
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<tr>
<td>Studio Office</td>
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<td>0.495</td>
<td>0.266</td>
</tr>
<tr>
<td>Office</td>
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<td>0.662</td>
</tr>
<tr>
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<td>0.919</td>
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<tr>
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<td>0.0083014/emp</td>
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<td>2.282</td>
<td>1.229</td>
</tr>
<tr>
<td>Amphitheater</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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</tr>
<tr>
<td>Child Care Facilities</td>
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<td>0.0019231/emp</td>
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<td>0.075</td>
<td>0.040</td>
</tr>
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<td><strong>Total Solid Waste (County jurisdiction)</strong></td>
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<tr>
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<td><strong>8.2844877</strong></td>
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</tbody>
</table>

Notes:  
\( du = \text{dwelling unit}; \ rms = \text{rooms}; \ sf = \text{square feet} \)

- **\text{a}** Proposed waste generation rates provided by City of Los Angeles Department of Public Works, 2000 Waste Characterization & Quantification Study, July 2002.
- **\text{b}** The total does not equal the sum of the individual land uses, as the solid waste generation for each individual land use has been rounded, while the total has not been rounded.

Source: Matrix Environmental, 2010.
The City of Los Angeles currently does not own or operate any landfill facilities. Nonetheless, the continuation of existing recycling programs as well as future recycling programs proposed as project design features, including a 65 percent recycling requirement pursuant to the proposed City and County Specific Plans, would serve to promote the City’s overall long-term diversion goal of 70 percent by 2020.522

With respect to the proposed Project’s contribution to the County-wide waste stream, the proposed Project’s waste would constitute a very small fraction of the amount of solid waste generated in Los Angeles County on an annual basis. Specifically, the solid waste generated by the maximum amount of allowable net new development at the Project Site under the proposed Project that would need to be landfilled would constitute approximately 0.03 percent of the 11,400,568 tons (not including inert waste) of Los Angeles County solid waste disposed of in 2007.523

Whereas in the past solid waste disposal occurred solely within landfills located in Los Angeles County, the trend in recent years is an increase in solid waste disposal at landfills located outside of the County. For example, in 2007 approximately 17.3 percent of the solid waste generated within the County was disposed of at landfill facilities located outside of Los Angeles County.524 As discussed previously, the County Integrated Waste Management Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element provides an analysis under seven landfill scenarios for the County. The analysis concludes that the County would be able to provide for its 15-year disposal needs by successfully permitting and developing all in-County landfill expansions, implementing alternative technologies, and utilizing out-of-County disposal facilities. Based on these facts, the proper current context within which to view the Project’s potential solid waste impacts is total disposal capacity which consists of landfills located within, as well as outside of, Los Angeles County.


The Puente Hills and Chiquita Canyon Landfills would be expected to continue to serve the Project Site until their respective closure dates (i.e., 2013 and 2019). The increase in solid waste disposed at landfills under the proposed Project would only constitute approximately 0.4 percent of the remaining combined daily intake of the Chiquita Canyon and Puente Hills Landfills for the duration of their lifetimes (i.e., 2,214 tons per day). However, because the Puente Hills Landfill does not accept waste from cities with populations over 2,500,000, such as the City of Los Angeles, it is assumed that the Puente Hills Landfill would only accept Project-related solid waste from the County portion of the Project Site, as the unincorporated County of Los Angeles currently has a population under 2,000,000 people. The Chiquita Canyon Landfill would therefore accept the balance of Project-related solid waste associated with the City portions of the Project Site. The increase in landfill-disposed solid waste from the County portion of the Project Site (i.e., 4.72 tons per day) would constitute approximately 0.4 percent of the remaining daily intake at the Puente Hills Landfill (i.e., 1,160 tons per day) for the duration of its lifetime (i.e., through 2013). The landfill-disposed solid waste from the City portions of the Project Site (i.e., 3.56 tons per day) would constitute approximately 0.3 percent of the remaining daily intake at the Chiquita Canyon Landfill (i.e., 1,054 tons per day) for the duration of its lifetime (i.e., through 2019). While these two existing landfills would have adequate capacity to accommodate the 8.28 tons per day of total additional Project-related disposal needs, as final Project buildout would not occur until 2030, it cannot be stated with certainty that these landfills would continue to operate, and, if they did operate, would continue to have remaining capacity at that time. As such, the solid waste disposal needs of the proposed Project may need to be met by other landfills located either within or outside of Los Angeles County.

Through a combination of extending the existing recycling program to include the proposed Project (i.e., direct diversion of pre-sorted paper, bottle, cans, and scrap metal, combined with sorting of general solid waste for recyclables at an off-site facility) and the project design features outlined above, the Applicant would implement a proactive program to address the solid waste impacts of the proposed Project. The combination of the proposed project design features, in conjunction with the limited proportion of total County-wide solid waste generation attributable to the Project, would help meet both City and County waste diversion goals and polices, including the City of Los Angeles Solid Waste Management Policy Plan, City of Los Angeles Source Reduction and Recycling Element, Framework Element, Solid Resources Infrastructure Strategy Facilities Plan, the Renew LA Plan, and City of Los Angeles Municipal Code, and the County’s Countywide Integrated Waste Management Summary Plan, Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County, and Countywide Siting Element. As such, the Project is consistent with the policies and programs expressed in these plans and documents. Thus, a less than significant impact would occur with regard to Project consistency with applicable solid waste plans, policies, and programs. While the existing landfills serving the Project Site have adequate capacity to accommodate Project-related
disposal needs, due to the uncertainty in future availability and capacity of these landfills from 2020 to 2030, it is conservatively assumed that the proposed Project would result in a potentially significant impact with respect to landfill capacity.

Development within the Studio, Entertainment and Business Areas would continue to be served by existing solid waste routes both within the Project Site as well as off the Project Site. As such, proposed development within the Studio, Entertainment and Business Areas would not create a need for additional solid waste collection routes to adequately handle Project-generated waste and a less than significant impact would result. Development within the proposed Mixed-Use Residential Area would include the completion of a new internal roadway system that would provide on-site routes for waste collection/hauling vehicles. Nevertheless, once off-site, the transport of solid waste generated within the Mixed-Use Residential Area to off-site waste management/disposal facilities would continue to use existing solid waste routes of travel and exit points from the Project Site. As mentioned above, the transport of solid waste off the Project Site currently occurs via the existing internal roadway system with off-site ingress/egress occurring via studio gates located along Lankershim Boulevard and at Lakeside Plaza Drive. As such, implementation of the development proposed within the Mixed-Use Residential Area would not result in a significant impact since the proposed Project would utilize existing solid waste collection routes to adequately handle Project-generated waste.

(3) Impacts Under No Annexation Scenario

The Project’s development program under the No Annexation scenario and the corresponding levels of solid waste generation under the No Annexation scenario are shown in Table 166 on page 1916. As shown therein, the Project under the No Annexation scenario would contribute approximately 3.78 tons/day to City landfills and approximately 4.47 tons/day of solid waste to County landfills, utilizing the same assumptions regarding waste diversion as those set forth above with respect to the proposed Project above.

The amount of solid waste generated under the No Annexation scenario would be the same as that generated under the proposed Project. The difference in Project sitewide solid waste generation as shown in Tables 165 and 166 is due to mathematical rounding.

525 Truck trips attributable to solid waste collection are also analyzed in the Project’s traffic analysis as a component of the trip generation rates included in that analysis. The results of the Project’s traffic analysis are provided in Section IV.B.1, Traffic/Circulation, and Appendix E-1 of this Draft EIR.
In terms of landfill disposal, as the Puente Hills Landfill does not accept waste from cities with populations over 2,500,000, such as the City of Los Angeles, it is assumed that the Puente Hills Landfill would accept Project-related solid waste from only the County.

<table>
<thead>
<tr>
<th>Proposed Land Use</th>
<th>Net New Development (unit)</th>
<th>Daily Generation Rate (tons/unit)</th>
<th>Total Waste Generated (tons/day)</th>
<th>Waste Recycled (tons/day)</th>
<th>Net Waste to Landfills (tons/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City Jurisdiction</strong></td>
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<td></td>
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<tr>
<td>Studio</td>
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<td>0.0083014/emp</td>
<td>3.511</td>
<td>2.282</td>
<td>1.229</td>
</tr>
<tr>
<td>Amphitheater</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Child Care Facilities</td>
<td>(40) emp</td>
<td>0.0019231/emp</td>
<td>(0.077)</td>
<td>(0.050)</td>
<td>(0.027)</td>
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<td><strong>Total Solid Waste (City jurisdiction)</strong></td>
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<td>Studio</td>
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<td>1.796</td>
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<tr>
<td>Multi-Family Residences</td>
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<td>4.482</td>
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<td>N/A</td>
</tr>
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<td>Child Care Facilities</td>
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<td><strong>8.2445307 b</strong></td>
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</table>

**Notes:**
- **du=dwelling unit; rms = rooms; sf=square feet**
- **a** Proposed waste generation rates provided by City of Los Angeles Department of Public Works, 2000 Waste Characterization and Quantification Study, July 2002.
- **b** The total does not equal the sum of the individual land uses, as the solid waste generation for each individual land use has been rounded, while the total has not been rounded.

**Source:** Matrix Environmental, 2010.
portion of the Project Site. The Chiquita Canyon Landfill would therefore be expected to accept the balance of Project-related solid waste associated with the City portions of the Project Site. Under the No Annexation scenario, the amount of landfill-disposed solid waste from the City portions of the Project Site would be comparable to that under the proposed Project (i.e., 3.78 tons per day compared to 3.56 tons per day under the proposed Project) would constitute approximately 0.4 percent (compared to 0.3 percent under the proposed Project) of the remaining daily intake at the Chiquita Canyon Landfill (i.e., up to 1,054 tons per day) for the duration of its lifetime (i.e., through 2019). The increase in landfill-disposed solid waste from the County portion of the Project Site would also be comparable to that under the proposed Project (i.e., 4.47 tons per day compared to 4.72 tons per day under the proposed Project) and both scenarios would constitute approximately 0.4 percent of the remaining daily intake at the Puente Hills Landfill (i.e., 1,160 tons per day) for the duration of its lifetime (i.e., through 2013). While these two existing landfills would have adequate capacity to accommodate the 8.24 tons per day of total additional Project-related disposal needs, as final Project buildout would not occur until 2030, it cannot be stated with certainty that these landfills would continue to operate, and, if they did operate, would continue to have remaining capacity at that time. As such, the solid waste disposal needs of the proposed Project may need to be met by other landfills located either within or outside of Los Angeles County. Therefore, as is the case with proposed Project, due to the uncertainty in future availability and capacity of regional landfills, development under the No Annexation scenario would also result in a potentially significant impact with respect to landfill capacity.

As the Project’s approach to solid waste management would be unchanged under the No Annexation scenario, retaining the existing jurisdictional boundary lines would not have any effect on the Project’s impacts with regard to the disposal of hazardous wastes; consistency with applicable solid waste plans, policies or programs; and the need for additional solid waste collection routes. As such, development under the No Annexation scenario would have a less than significant impact with regard to the disposal of hazardous wastes and consistency with applicable solid waste plans, policies or programs. As is the case with the proposed Project, impacts under the No Annexation scenario with regard to solid waste collection routes would also be less than significant for development within all portions of the Project Site as existing solid waste collection routes would continue to be used.

4. Cumulative Impacts

Implementation of the proposed Project in combination with the identified related projects and forecasted growth would further increase regional demands on landfill capacities. Based on current per capita solid waste generation rates, the cumulative solid waste generated by growth throughout Los Angeles County (i.e., all cities as well as unincorporated areas) was calculated to determine if the Project Site under either the
proposed Project or No Annexation scenario would contribute a quantity of solid waste that would need to be landfilled by 2030, the year of Project buildout, that would result in a cumulatively considerable impact by requiring an additional disposal facility or conflicting with the policies and objectives of applicable solid waste plans.

Cumulative development in Los Angeles County, as shown in Table 167 on page 1919, would generate approximately 13.25 million tons of non-hazardous construction debris between 2007 and 2030, the year of Project buildout. Similar to the proposed Project, this impact would occur throughout the forecast period rather than occurring all at once. The same assumptions regarding the calculation of daily construction waste generation used for the proposed Project (i.e., assuming that construction would occur over 22 days each month for 21 years) were applied to cumulative development within Los Angeles County. As a result, the construction of cumulative development would generate approximately 2,391 tons of non-hazardous construction debris per day (13,253,200.676 tons ÷ 21 years ÷ 12 months ÷ 22 days). The Peck Road Gravel Pit has a daily permitted intake of 1,210 tons per day. While it is likely that some amount of the construction debris would be recycled, it is conservatively concluded that the amount of cumulative construction debris that would need to be landfilled would exceed the capacity of the Peck Road Gravel Pit.

Regarding operational waste, as shown in Table 168 on page 1920, the City of Los Angeles would generate an additional 2,248.59 tons of solid waste per day based on forecasted growth between 2007 and 2030, the year of Project buildout. Assuming the 56 percent diversion rate achieved by the City of Los Angeles in 2005, approximately 989.38 tons of solid waste would need to be landfilled on a daily basis. It should be noted that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on successful implementation of the City’s objective to achieve a 70 percent diversion goal by 2020 and eventually to a zero waste scenario as envisioned in the Los Angeles Solid Waste Integrated Resources Plan. In comparison, all other areas within the County of Los Angeles (excluding the City of Los Angeles) would generate 5,149.26 tons of solid waste per day. Assuming the 50 percent diversion required by Assembly Bill 939, all other areas within Los Angeles County would generate 2,574.63 tons of solid waste per day that would need to be landfilled.

a. Cumulative Proposed Project Impacts

Regarding construction waste, as discussed above, cumulative development in Los Angeles County would generate approximately 13.25 million tons of non-hazardous construction debris between 2007 and 2030. As shown in Table 167 on page 1919, when the Project’s 62,304 tons of construction debris are added to this amount, it brings the total to approximately 13.32 million tons of non-hazardous construction debris that would need to be disposed of over the life of the Project. As discussed above, however, pursuant to
the proposed County and City Specific Plans, during new construction a minimum of 65 percent of the non-hazardous construction and demolition debris by weight from construction of new Project buildings would be recycled and/or salvaged for re-use. Therefore, the Project’s average daily construction debris would be reduced. When the Project’s construction debris (3.93 tons per day) is added to the cumulative amount, it brings the total to 2,394.48 tons of non-hazardous construction debris per day that would need to be disposed of. As such, the Project’s disposal of 3.93 tons of non-hazardous construction debris would account for only 0.16 percent of the cumulative non-hazardous construction waste disposed of throughout Los Angeles County during the life of the Project. Although this level of daily disposal would exceed the Peck Road Gravel Pit’s daily permitted intake of 1,210 tons per day, the Project’s contribution would account for only 0.16 percent of the total non-hazardous construction debris throughout Los Angeles County. As the Project’s contribution is not cumulatively considerable, the Project’s cumulative construction impacts would be less than significant.

Regarding operational solid waste, as discussed above, the proposed Project would generate approximately 23.67 tons of solid waste per day. As noted, the Project Site currently recycles approximately 50 percent of its waste. As existing recycling programs are planned to be expanded under the operation of the Project with increased

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Net Development (sf/du)</th>
<th>Generation Rate (tons/sf)</th>
<th>Total (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition</td>
<td>134,112,487 sf&lt;sup&gt;a&lt;/sup&gt;</td>
<td>0.0775&lt;sup&gt;b&lt;/sup&gt;</td>
<td>10,393,717.743</td>
</tr>
<tr>
<td>Construction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>853,744 units&lt;sup&gt;c&lt;/sup&gt;</td>
<td>0.00219&lt;sup&gt;b&lt;/sup&gt;</td>
<td>2,243,639.232</td>
</tr>
<tr>
<td>Non-Residential (Studio, Office, Entertainment, Retail, Hotel)</td>
<td>316,632,067 sf&lt;sup&gt;c&lt;/sup&gt;</td>
<td>0.001945&lt;sup&gt;b&lt;/sup&gt;</td>
<td>615,849.370</td>
</tr>
</tbody>
</table>

**Cumulative LA County Demolition/Construction Waste Generation**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Generation Rate (tons/sf)</th>
<th>Total (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Demolition/Construction Waste Generation</td>
<td>62,304.071</td>
<td>13,253,206.345</td>
</tr>
<tr>
<td>Total Demolition/Construction Waste Generation</td>
<td></td>
<td>13,315,510.416</td>
</tr>
</tbody>
</table>

**Notes:** sf=square feet; du=dwelling unit. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

<sup>a</sup> Demolition is assumed to be 10 percent of the total amount of forecasted construction.


<sup>c</sup> Based on Southern California Association of Governments 2004 Regional Transportation Plan forecasted household and employment growth for Los Angeles County and an average of 3 employees per 1,000 square feet of floor area.

**Source:** Matrix Environmental, 2010.
effectiveness, the proposed Project would increase the percentage of on-site waste (e.g., paper, cans, bottles, scrap metals, etc.) recycled to 65 percent pursuant to the proposed City and County Specific Plans, thereby diverting a greater percentage of waste from landfills when compared to existing operations. Therefore, the actual amount of additional waste generated by the proposed Project that would be disposed of at landfills is forecasted to be approximately 8.28 tons per day. As shown above in Table 165 on page 1912, under the proposed Project, the portion of the Project Site located within the City of Los Angeles would generate 3.56 tons of solid waste per day that would need to be landfilled, while the portion of the Project Site located in unincorporated portions of Los Angeles County would generate 4.72 tons of solid waste per day that would need to be landfilled.
As detailed below in Table 169 on page 1922, when the increase in waste from the proposed Project is added to the forecasted growth in the City’s solid waste stream that would need to be landfilled, the cumulative increase in the City’s solid waste stream that would need to be landfilled totals 992.941 tons per day. As the City portion of the proposed Project would constitute 3.56 tons of this solid waste, the increase in solid waste generated under the Project would contribute only a small fraction (0.4 percent) of the cumulative 2030 City solid waste stream that would need to be landfilled. Similarly, when the increase in solid waste generated from the County portion of the proposed Project is added to the forecasted growth in the County solid waste stream that would need to be landfilled, the 2030 County solid waste stream that would need to be landfilled totals 2,579.35 tons per day. As the County portion of the Project Site would generate an increase of 4.722 tons of solid waste per day that would need to be landfilled, the Project’s increase would contribute only a small fraction (0.2 percent) of the cumulative 2030 County solid waste stream that would need to be landfilled. Thus, the total amount of solid waste from forecasted growth that would need to be landfilled in Los Angeles County, including solid waste from the proposed Project, would be 3,572.29 tons per day, of which the proposed Project’s increase would contribute 8.28 tons per day, or approximately 0.2 percent. It is important to note that this estimate is conservative, as the cumulative growth in the City and County likely includes some of the growth associated with the proposed Project. However, to provide a more conservative analysis, the increase in solid waste generated by the proposed Project has been added to the increase in solid waste.

Pursuant to Assembly Bill 939, the County Integrated Waste Management Plan 2007 Annual Report on the Countywide Summary Plan and Countywide Siting Element provides an analysis under seven landfill scenarios for the County. The analysis concludes that the County would be able to provide for its 15-year disposal needs by successfully permitting and developing all in-County landfill expansions, implementing alternative technologies, and utilizing out-of-County disposal facilities. As discussed above, whereas in the past solid waste disposal occurred solely within landfills located in Los Angeles County, the trend in recent years is an increase in solid waste disposal at landfills located outside of the County. For example, in 2007 approximately 17.3 percent of the solid waste generated within the County was disposed of at landfill facilities located outside of Los Angeles County. However, as the cumulative solid waste disposal needs of the proposed Project and related projects may need to be met by other landfills located either within or outside of Los Angeles County, the proposed Project may make a considerable contribution to a significant cumulative impact with respect to landfill capacity.

It is anticipated that, similar to the proposed Project, the related projects would not conflict with and instead would act to implement applicable City and County waste diversion goals and policies, including the City’s Solid Waste Management Policy Plan, Source Reduction and Recycling Element, Framework Element, Solid Resources Infrastructure Strategy Facilities Plan, and City Municipal Code, and the County’s Integrated Waste Management Summary Plan, Source Reduction and Recycling Element, and Countywide Siting Element. Thus, cumulative impacts with regard to consistency with solid waste plans, policies, and programs would be less than significant. Furthermore, the cumulative solid waste generation associated with the development of the related projects could create a need for additional solid waste collection routes to adequately handle solid waste generated by this development, which is considered a potentially significant cumulative impact. However, as no Project impacts would occur, the Project’s cumulative impacts with regards to solid waste collection routes are concluded to be less than significant.

b. Cumulative Impacts Under No Annexation Scenario

Regarding non-hazardous construction debris, the disposal of non-hazardous construction debris would not be affected by the proposed annexation and detachment actions as the Peck Road Gravel accepts non-hazardous construction debris from all locations throughout Los Angeles County. Therefore, as the No Annexation scenario would result in the same amount of overall development as the proposed Project, the retention of the existing jurisdictional boundaries under the No Annexation scenario would

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**Table 169**

Cumulative Landfilled Solid Waste - Proposed Project

<table>
<thead>
<tr>
<th></th>
<th>Landfilled Solid Waste (tons/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City of Los Angeles</strong></td>
<td></td>
</tr>
<tr>
<td>2030 Cumulative Landfilled Solid Waste</td>
<td>989.378</td>
</tr>
<tr>
<td>Proposed Project (City) Landfilled Solid Waste</td>
<td>3.562</td>
</tr>
<tr>
<td>Total Landfilled Waste (City)</td>
<td>992.941a</td>
</tr>
<tr>
<td><strong>County of Los Angeles</strong></td>
<td></td>
</tr>
<tr>
<td>2030 Cumulative Landfilled Solid Waste</td>
<td>2,574.629</td>
</tr>
<tr>
<td>Proposed Project (County) Landfilled Solid Waste</td>
<td>4.722</td>
</tr>
<tr>
<td>Total Landfilled Waste (County)</td>
<td>2,579.351a</td>
</tr>
<tr>
<td><strong>Total Landfilled Solid Waste</strong></td>
<td>3,572.2919231 a</td>
</tr>
</tbody>
</table>

*a The total does not equal the sum of the individual jurisdictions, as the solid waste generation for each individual jurisdiction has been rounded for ease of reading, while the total has not been rounded.

Source: Matrix Environmental, 2010.
result in the same impact on the Peck Road Gravel Pit as the proposed Project. As such, development under the No Annexation scenario would result in impacts with regard to inert landfill capacity that are not cumulatively considerable and thus less than significant on a cumulative basis.

Regarding operational solid waste, under the No Annexation scenario, more of the Project Site would be located within the unincorporated portion of the County of Los Angeles and less of the Project Site would be located within the City of Los Angeles. As shown in Table 166 on page 1916, under the No Annexation scenario, the portion of the Project Site located within the City of Los Angeles would generate 3.78 tons of solid waste per day that would need to be landfilled, while the portion of the Project Site located in unincorporated portions of Los Angeles County would generate 4.47 tons of solid waste per day that would need to be landfilled.

As shown in Table 170 on page 1924, when the increase in solid waste from the Project Site under the No Annexation scenario is added to the forecasted growth in the City’s solid waste stream that would need to be landfilled, the cumulative increase in the City’s solid waste stream that would need to be landfilled totals 993.16 tons per day. As the City portion of the proposed Project would generate an additional 3.78 tons of this waste, the Project’s increase would constitute a small fraction (i.e., 0.4 percent) of the cumulative 2030 City solid waste stream that would need to be landfilled. Similarly, when the increase in solid waste generated from the County portion of the Project Site is added to the forecasted growth in the County solid waste stream that would need to be landfilled, the 2030 County solid waste stream that would need to be landfilled totals 2,579.09 tons per day. As the County portion of the proposed Project would generate an additional 4.47 tons of solid waste per day that would need to be landfilled, the Project would constitute a small fraction (approximately 0.2 percent) of the cumulative 2030 County solid waste stream that would need to be landfilled. Thus, the total solid waste that would need to be landfilled in Los Angeles County would be 3,572.25 tons per day, of which the proposed Project would contribute 8.24 tons per day, or approximately 0.2 percent of the solid waste that would need to be landfilled. It is important to note that this estimate is conservative, as the cumulative growth in the City and County likely includes some of the growth associated with the proposed Project. However, to provide a more conservative analysis, the increase in solid waste generated by the proposed Project has been added to the forecasted increase in solid waste.

For the same reasons as outlined above under the analysis of cumulative impacts of the proposed Project, cumulative impacts on landfill capacity under the No Annexation scenario are concluded to be significant. It is anticipated that, similar to the proposed Project, cumulative development under the No Annexation scenario would be consistent with applicable solid waste plans, policies, and programs and a less than significant impact would result. Furthermore, the cumulative solid waste generation associated with the
development of the related projects could create a need for additional solid waste collection routes to adequately handle solid waste generated by this development, which is considered a potentially significant cumulative impact. However, as no Project impacts would occur under the No Annexation scenario, the Project’s cumulative impacts with regard to solid waste collection routes are concluded to be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

Implementation of the project design features for the proposed Project described above and restated below would ensure the Applicant’s continued operation of effective on-site waste management and recycling programs that would divert 65 percent of waste generated from regional landfills in accordance with the proposed City and County Specific Plans.

Project Design Feature L.3-1: During new construction a minimum of 65 percent of the non-hazardous demolition and construction debris by weight from construction of new Project buildings shall be recycled and/or salvaged for reuse.

<table>
<thead>
<tr>
<th>Table 170</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative Landfilled Solid Waste - No Annexation Scenario</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>City of Los Angeles</td>
</tr>
<tr>
<td>2030 Cumulative Landfilled Solid Waste</td>
</tr>
<tr>
<td>Project Under the No Annexation Scenario</td>
</tr>
<tr>
<td><em>Total Landfilled Waste (City)</em></td>
</tr>
</tbody>
</table>

County of Los Angeles

| 2030 Cumulative Landfilled Solid Waste                                     | 2,574.629 |
| Project Under the No Annexation Scenario                                   | 4.465    |
| *Total Landfilled Waste (County)*                                          | 2,579.0941993 a |

| *Total Landfilled Solid Waste*                                             | 3,572.2519661 a |

*The total does not equal the sum of the individual jurisdictions, as the solid waste generation for each individual jurisdiction has been rounded for ease of reading, while the total has not been rounded.

Source: Matrix Environmental, 2010.
**Project Design Feature L.3-2:** All structures constructed or uses established within any part of the proposed Mixed-Use Residential Area shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins to facilitate the separation and deposit of recyclable materials.

**Project Design Feature L.3-3:** Primary collection bins within any part of the Mixed-Use Residential Area shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on-or off-site recycling facilities.

**Project Design Feature L.3-4:** Within any part of the Mixed-Use Residential Area, the Applicant or its successor shall continuously maintain in good order clearly marked, durable and separate recycling bins on the same lot or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

**Project Design Feature L.3-5:** During occupancy and operations, the Project shall have a solid waste diversion target of 65 percent of the non-hazardous waste pursuant to the proposed City and County Specific Plans.

**b. Mitigation Measures**

As Project impacts during construction and operations would be reduced to the extent feasible through the above project design features, no mitigation measures are required.

**6. Level of Significance After Mitigation**

Development of the proposed Project would not create a need for additional inert solid waste disposal facilities; thus, construction-related waste would result in a less than significant impact with respect to landfill capacity. Likewise, the proposed Project would result in a less than significant impact associated with the disposal of hazardous wastes and solid waste collection routes.

Operation of the proposed Project would involve the continued implementation and expansion of on-site waste management and recycling programs to divert 65 percent of waste generated from regional landfills pursuant to the proposed City and County Specific
IV.L.3 Utilities - Solid Waste

Plans. With these diversion rates, the proposed Project would generate an estimated increase of 4.74 tons per day of solid waste requiring disposal at County landfills and 3.62 tons per day of solid waste requiring disposal at City landfills. In comparison, under the No Annexation scenario, the Project would generate an estimated increase of 4.51 tons per day of solid waste requiring disposal at County landfills and 3.81 tons per day of solid waste requiring disposal at City landfills. While the existing landfills serving the Project Site have adequate capacity to accommodate Project-related disposal needs, due to the uncertainty in future availability and capacity of these landfills over the entire buildout period for the proposed Project, it is conservatively assumed that the Project’s operational impacts to landfill capacity would remain significant and unavoidable. Likewise, as diversion measures cannot be ensured for related projects, cumulative impacts with regard to regional landfill disposal capacity would also remain significant and unavoidable. It should be noted that the identification of additional landfills is generally addressed at the City and County levels (e.g., through the County’s Countywide Siting Element) and, as such, is not under the control of the Applicant. Other than waste minimization and diversion, which are project design features, no other feasible mitigation measures have been identified to address this potential impact.

During construction and operation, the proposed Project would not conflict with and would act to implement applicable City and County waste diversion goals and polices, including the City of Los Angeles Solid Waste Management Policy Plan, City of Los Angeles Source Reduction and Recycling Element, Framework Element, Solid Resources Infrastructure Strategy Facilities Plan, and City Municipal Code, and the County’s Countywide Integrated Waste Management Summary Plan, Source Reduction and Recycling Element for the Unincorporated Portions of Los Angeles County, Countywide Siting Element, and the County’s Green Building Program, and as such would result in a less than significant impact with respect to these solid waste plans, policies, and programs.

In addition, the Project would not create the need for an additional solid waste collection route, as the Project would utilize existing solid waste collection routes, and a less than significant impact with regards to solid waste collection routes would occur.