IV. ENVIRONMENTAL IMPACT ANALYSIS O. UTILITIES AND SERVICE SYSTEMS 1. WASTEWATER

ENVIRONMENTAL SETTING

The City of Los Angeles Department of Public Works Bureau of Sanitation Division (LABS) provides sewer conveyance infrastructure and wastewater treatment services to the project area. The Hyperion Treatment Plant (HTP), located west of the Los Angeles International Airport in Playa Del Rey, provides treatment capacity for wastewater flows generated within the project area. The HTP has a design capacity of 450 million gallons per day (mgd) and currently treats an average of 350 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater five miles offshore.¹ The remaining capacity of the HTP is, therefore, approximately 100 mgd or 22 percent of its total capacity.

The Hyperion Service Area (HSA) encompasses approximately 328,000 acres, or approximately 515 square miles, of the greater Los Angeles area and serves approximately four million people. The HSA also serves 53,000 acres outside the jurisdiction of the City on a contract basis. The HSA includes approximately 96 percent of the total area served by LABS.

The existing sewer lines nearest to the project site are located under Constellation Boulevard and Olympic Boulevard, which is adjacent to the project site.² In the vicinity of the project site, these are 15-inch and 10-inch sewer lines, respectively. The design capacity of these sewer lines is approximately 1,900,000 gallons per day (gpd) and 800,000 gpd, respectively. Both of these sewer lines feed into 18-inch sewer lines located in Constellation Boulevard and Lauriston Avenue, respectively. According to the City Wastewater Engineering Services Division of the Bureau of Engineering, there are no sewer service problems or deficiencies in the immediate vicinity of the project site.³

¹ Personal communication with Belal Tamimi, City of Los Angeles Department of Public Works, Bureau of Sanitation Division, August 12, 2005.

² Written correspondence from Adel Hagekhalil, City of Los Angeles Department of Public Works, Bureau of Sanitation Division, August 2, 2005.

³ Ibid.

ENVIRONMENTAL IMPACTS

Threshold of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- (b) Result in a determination by the wastewater treatment provider which serves or may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Furthermore, as set forth in the City of Los Angeles <u>Draft L.A. CEQA Thresholds Guide</u>, a project would normally have a significant wastewater impact if:

- (a) The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- (b) The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

Project Impacts

Implementation of the proposed project would introduce 147 new condominiums, a 7,000-square-foot restaurant, and either 27,000 square feet of resident-focused specialty retail uses or 43,000 square feet of private membership facilities. In addition, in order to comply with the City's water conservation and sewer allocation ordinances, the proposed project's new residences shall be equipped with water conservation devices (i.e., showerheads, toilets, faucets, etc.) (see also Section IV.O.2, Water Supply). The standard City sewage generate rate used to estimate the proposed project's future sewage generation reflect these latest water conservation measures.

As indicated in Table IV.O-1, Proposed Project Wastewater Generation, the proposed project is estimated to generate a total of 33,500 gpd. However, considering the wastewater generation of the former hotel, the proposed project would –result in a net decrease of 6,390 gpd of wastewater (see Table IV.O-1).

			Total Daily Wastewater		
Land Use	Size	Generation Rate ^a	Generation (gpd)		
2-bedroom Condominiums	60 du	160 gallons/du/day	9,600		
3-bedroom Condominiums	76 du	200 gallons/du/day	15,200		
4-bedroom Condominiums	11 du	240 gallons/du/day	2,640		
Retail	43,000 sf ^b	80 gallons/1,000 sf/day	3,440		
Restaurant	7,000 sf	300 gallons/1,000 sf/day	2,100		
		Subtotal Proposed Project	32,980		
Former Hotel	-297 rooms	130 gallons/room/day	-38,610		
		Total	-5,630		
Notes: du = dwelling unit; sf = square feet; gpd = gallons per day ^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005.					

Table IV.O-1 **Proposed Project Wastewater Generation**

^b The proposed 43,000 sf of retail land uses is included in this table to represent a conservative estimate.

The project is proposed to be served by an existing 15-inch sewer line under Constellation Boulevard and a 10-inch sewer line under Olympic Boulevard. These points of the sewer system feed into larger sewer lines; as the sewer line under Constellation Boulevard feeds into an 18-inch sewer line under Constellation Boulevard, and the sewer line under Olympic Boulevard feeds into an 18-inch sewer line under Lauriston Avenue.

According to the Wastewater Engineering Services Division of the City Bureau of Engineering, the existing sewer lines under Constellation and Olympic Boulevards have the capacity to handle the sewage generation flow from the proposed project, based on the estimated flows in the area and because the proposed residences would generate less wastewater than the hotel.⁴ Since there are existing sewer lines adjacent to and nearby the project site with sufficient capacity to handle the flows from the proposed project, no offsite sewer line improvements are anticipated, other than the proposed project's connection. Further, the HTP has approximately 100 mgd of remaining capacity, which would be increased by the net decreased flow of -5,630 gpd from the project site.⁵ The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Thus, the proposed project would have no impact on sewer systems.

Ibid.

⁵ Personal communication with Belal Tamimi, City of Los Angeles Department of Public Works, Bureau of Sanitation Division, August 12, 2005.

CUMULATIVE IMPACTS

The related projects evaluated in this cumulative impacts analysis comprise the planned or projected development identified in the related projects list (see Section II.B of this Draft EIR). The geographic context for this cumulative impacts analysis entails the LABS service area; as the LABS service area encompasses all of metropolitan Los Angeles, all of the identified related projects are included in the following cumulative impacts discussion. The related projects primarily include residential, commercial retail, and office land uses. Implementation of the proposed project in combination with the 66 related projects would increase the generation of wastewater. As shown in Table IV.O-2, Cumulative Wastewater Generation, the estimated wastewater generation by the related projects in combination with the proposed project and ambient growth would be approximately 23,319,609 gallons per day (23.3 mgd). However, cumulative impacts are expected to be less than significant for the reasons discussed below.

No.	Proposed Land Use	Size ^a	Generation Factor ^b	Total Daily Wastewater Generation (gpd)
1	Religious Institution	14,811 sf	200 gallons/1,000 sf/day	2,962
	Hotel	228 rooms	130 gallons/room/day	29,64
2	Condominiums	25 du	160 gallons/du/day	4,000
2	Retail	791 sf	80 gallons/1,000 sf/day	63
	Restaurant	2,230 sf	300 gallons/1,000 sf/day	669
3	Office	41,500 sf	150 gallons/1,000 sf/day	6,225
4	Church	9,325 s.ft.	200 gallons/1,000 sf/day	1,865
5	Retail	1,750 sf	80 gallons/1,000 sf/day	140
6	Retail	11,900 sf	80 gallons/1,000 sf/day	952
7	Residential	88 du	160 gallons/du/day	14,080
/	Retail	40,000 sf	80 gallons/1,000 sf/day	3,200
8	Cultural Center	34,000 sf	20/1,000 sf/day	680
9	Automotive	53,000 sf	800 gallons/1,000 sf/day	42,400
10	Congregate Care	76 du	160 gallons/du/day	12,160
11	Automotive	39,700 sf	800 gallons/1,000 sf/day	31,760
12	Office	19,000 sf	150 gallons/1,000 sf/day	2,850
13	Medical Office	4,800 sf	250 gallons/1,000 sf/day	1,200
15	Condominiums	20 du	160 gallons/du/day	3,200
14	Apartments	37 du	160 gallons/du/day	5,920
15	Medical Office	85,000 sf	250 gallons/1,000 sf/day	21,250
16	Gym	30,000 sf	250 gallons/1,000 sf/day	7,500
17	Retail	90,000 sf	80 gallons/1,000 sf/day	7,200
18	Retail	4,550 sf	80 gallons/1,000 sf/day	364
19	Condominiums	20 du	160 gallons/du/day	3,200
17	Retail	12,000 sf	80 gallons/1,000 sf/day	960
20	Condominiums	16 du	160 gallons/du/day	2,560
21	Congregate Care	80 du	160 gallons/du/day	12,800
22	Condominiums	11 du	160 gallons/du/day	1,760

Table IV.O-2Cumulative Wastewater Generation

				Total Daily Wastewater
No.	Proposed Land Use	Size ^a	Generation Factor ^b	Generation (gpd)
23	Condominiums	9 du	160 gallons/du/day	1,440
23	Condominiums	11 du	160 gallons/du/day	1,760
24	Condominiums	38 du	160 gallons/du/day	6,080
23	Condominiums	13 du	160 gallons/du/day	2,080
20	Condominiums	23 du	160 gallons/du/day	3,680
27		1 du	160 gallons/du/day	160
28	Apartment Condominiums	4 du	160 gallons/du/day	640
30	Condominiums	3 du	160 gallons/du/day	480
31	Condominiums	40 du		
31			160 gallons/du/day	6,400
32	Retail	11,085 sf	80 gallons/1,000 sf/day	887
33	Condominiums	53 du	160 gallons/du/day	8,480
	Retail	14,000 sf	80 gallons/1,000 sf/day	1,120
34	Condominiums	35 du	160 gallons/du/day	5,600
35	Apartments	19 du	160 gallons/du/day	3,040
	2,000 Beds	2,000 students	75 gallons/student/day	150,000
	NW Phase II	296,700 sf	150 gallons/1,000 sf/day	44,505
	Physics & Astronomy Building	191,900 sf	150 gallons/1,000 sf/day	28,785
36	Research Center, Thermal storage	95,000 sf	20 gallons/1,000 sf/day	1,900
	Nanosystems Institute	166,000 sf	150 gallons/1,000 sf/day	24,900
	Health Center Replacement	1,710,000 sf	250 gallons/1,000 sf/day	427,500
37	Theater	106 seats	4 gallons/seat/day	424
	Retail	15,000 sf	80 gallons/1,000 sf/day	1,200
20	Restaurant	2,993 sf	300 gallons/1,000 sf/day	898
38	Medical Office	74,000 sf	250 gallons/1,000 sf/day	18,500
	Theater	1,135 seats	4 gallons/seat/day	4,540
20	Retail	115,000 sf	80 gallons/1,000 sf/day	9,200
39	Apartments	350 du	160 gallons/du/day	56,000
40	Office	937,000 sf	150 gallons/1,000 sf/day	140,550
41	Apartments	19 units	160 gallons/du/day	3,040
	Retail	6,100 sf	80 gallons/1,000 sf/day	488
42	Condominiums	93 units	160 gallons/du/day	14,880
43	Condominiums	119 du	160 gallons/du/day	19,040
44	Gas station with Mart	2 toilets	100 gallons/toilet/day	200
45	Studio Expansion	360,000 sf	80 gallons/1,000 sf/day	28,800
46	High School Expansion	32 students ^c	12 gallons/student/day	384
47	Office	508,600 sf	150 gallons/1,000 sf/day	76,290
48	Retail	71,000 sf	80 gallons/1,000 sf/day	5,680
49	Condominiums	483 du	160 gallons/du/day	77,280
50	Office	791,000 sf	150 gallons/1,000 sf/day	118,650
	Day Care	84 children	8 gallons/child/day	672
51	Private School K-8	216 students	8 gallons/student/day	1,728

Table IV.O-2 (Continued)Cumulative Wastewater Generation

No.	Proposed Land Use	Size ^a	Generation Factor ^b	Total Daily Wastewater Generation (gpd)
	Restaurant	32,023 sf	300 gallons/1,000 sf/day	9,607
52	Retail	19,214 sf	80 gallons/1,000 sf/day	1,537
52	Office	763,900 sf	150 gallons/1,000 sf/day	114,585
	Cultural	10,675 sf	20/1,000 sf/day	214
53	Private Middle School	0 students ^d	8 gallons/student/day	0
	Condominiums	65 du	160 gallons/du/day	10,400
54	Assisted Living	181 du	160 gallons/du/day	28,960
	Retail	20,000 sf	80 gallons/1,000 sf/day	1,600
55	Retail	78,000 sf	80 gallons/1,000 sf/day	6,240
33	Office	12,000 sf	150 gallons/1,000 sf/day	1,800
56	Medical Use	44,896 sf	250 gallons/1,000 sf/day	11,224
57	Condominiums	88 du	160 gallons/du/day	14,080
57	Retail	40,000 sf	80 gallons/1,000 sf/day	3,200
58	Hotel	42 rooms	130 gallons/room/day	5,460
59	Synagogue	9,000 sf	200 gallons/1,000 sf/day	1,800
39	Private School (K-12)	22 students ^c	10 gallons/student/day	220
60	Private School (K-12)	66 students	10 gallons/student/day	660
61	Hotel	204 rooms	130 gallons/room/day	26,520
62	Theater	2,340 seats	4 gallons/seat/day	9,360
62	Shopping Center	723,466 sf	80 gallons/1,000 sf/day	57,877
63	Apartments	36 du	160 gallons/du/day	5,760
05	Retail	8,485 sf	80 gallons/1,000 sf/day	679
64	Convenience Store	3,750 sf	80 gallons/1,000 sf/day	300
65	Private School (9 th grade)	94 students ^c	8 gallons/student/day	752
66	Hotel	42 rooms	130 gallons/room/day	5,460
			Subtotal Related Projects	1,836,736
	-5,630			
	21,477,243			
	23,319,609			

Table IV.O-2 (Continued) Cumulative Wastewater Generation

du = dwelling unit; sf = square feet; gpd = gallons per day

^a Residential uses assumed to contain average of 2 bedrooms; Gas station uses assumed to contain 2 toilets.

^b Source: City of Los Angeles, Bureau of Engineering, August 2, 2005.

^c Conservative estimate based on the peak hour trips information contained in the traffic report prepared for the proposed project (included as Appendix H).

^{*d*} No student increase would result from the school modernization project.

^e Ambient growth represents 1.5% per year of the HTP wastewater treatment through project buildout (2009).

The 66 related projects are all located within City of Los Angeles or City of Beverly Hills and would be provided wastewater treatment services by the HTP. As previously discussed, the design capacity of the HTP is 450 mgd, and the HTP's current average wastewater flow is 350 mgd. Therefore, the HTP has a remaining capacity of approximately 100 mgd. The cumulative sewage generation would be within the

design capacity of the HTP, representing about 23 percent of the remaining capacity. Therefore, the cumulative impact of the related projects in combination with the proposed project on wastewater facilities would be less than significant.

Based on the foregoing discussion, the proposed project would not incrementally increase the cumulative wastewater generation and, therefore, would not result in a cumulative impact on wastewater services and facilities.

MITIGATION MEASURES

The proposed project would not have an impact on wastewater services. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project would not have an impact on sewer services.

IV. ENVIRONMENTAL IMPACT ANALYSIS O. UTILITIES AND SERVICE SYSTEMS 2. WATER SUPPLY

ENVIRONMENTAL SETTING

The City of Los Angeles Department of Water and Power (LADWP) is responsible for ensuring that water demand in the City is met and that State and federal water quality standards are achieved. For the fiscal year of 2001-2002, City water supplies were derived from the following sources: (1) the Los Angeles Aqueduct, approximately 34 percent; (2) groundwater, approximately 11 percent; and (3) purchases from the Metropolitan Water District (MWD), approximately 55 percent.⁶ The amount of water obtained from these sources varies from year to year, and is primarily dependent on weather conditions and demand. In addition, reclamation of wastewater is utilized for certain irrigation purposes.

Water storage is essential for LADWP to supply water during high demand conditions and for firefighting and emergencies. The City water system includes 104 tanks and reservoirs ranging in size from 10,000 to 60 billion gallons with a total capacity of 109 billion gallons.⁷ In addition to State regulations, LADWP has instituted its own water conservation measures, including:

- "Water Closet, Urinal, and Showerhead Regulations" (LAMC Sections 122.00–122.10) Reduces water consumption by requiring new buildings to include water conservation fixtures (such as low flush toilets, urinals, taps, and showerheads) and plumbing fixtures that reduce water loss from leakage in order to obtain City building permits. In addition, there are provisions requiring xeriscaping (i.e., the use of low-maintenance, drought-resistant plants).
- "The Emergency Water Conservation Plan of the City of Los Angeles" (LAMC Sections 121.00-121.13) Provides for the implementation of a citywide phased water conservation program to respond to dry weather periods based on the DWP's evaluation of the projected supply and demand of City water supplies. The phased conservation program provides for mandatory water conservation measures at the user level and customer use curtailment of normal water usage.

⁶ City of Los Angeles Department of Water and Power, Urban Water Management Plan, Fiscal Year 2001-2002 Annual Update.

⁷ City of Los Angeles, Draft L.A. CEQA Thresholds Guide, May 1998.

• The DWP is also continuing its water recycling efforts to reduce further the demand on imported water.⁸

The City is also entitled to extract 108,100 acre-feet per year (35.7 billion gallons) from the San Fernando Basin as well as the Central and Sylmar groundwater basins. The San Fernando Basin holds a water reserve totaling 255,000 acre-feet (83.1 billion gallons) as of October 1999, and LADWP has the right to pump water from this reserve in the case of temporary interruption of water imports or in case of a drought that reduces production from the Los Angeles Aqueduct.

The nearest existing water lines to the project site are the LADWP 12-inch, cast iron (cement lined) water mains located under Avenue of the Stars and Olympic Boulevard; either of these mains can serve the project site.⁹ According to LADWP, there are no known deficiencies in the water supply system in the project area.¹⁰

The primary water treatment plant serving the general Los Angeles area, including the project site, is the Los Angeles Filtration Plant (LAFP). The LAFP has a design capacity of 600 mgd. The average plant flow is 450 mgd in non-summer months, and 550 mgd during summer months. The remaining capacity of the LAFP is, therefore, approximately 125 mgd or 21 percent of its total capacity.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if:

- (a) A project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or
- (b) If there were insufficient water supplies available to serve the project from existing entitlements and resources, and new or expanded entitlements were needed.

Furthermore, as set forth in the City of Los Angeles <u>Draft L.A. CEQA Thresholds Guide</u>, the determination of significance shall be made on a case-by-case basis, considering the following factors:

(a) The total estimated water demand for the project;

⁸ City of Los Angeles, Department of Water and Power, Urban Water Management Plan, Fiscal Year 2001-2002 Annual Update, page 12.

⁹ Written correspondence from Charles Holloway, Los Angeles Department of Water and Power, August 8, 2005.

¹⁰ Ibid.

- (b) Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- (c) The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- (d) The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Project Impacts

Implementation of the proposed project would introduce 147 new condominiums, a 7,000-square-foot restaurant, and either 27,000 square feet of resident-focused specialty retail uses or 43,000 square feet of private membership facilities. The proposed project would result in the demand for approximately 38,664 gallons per day (gpd) of water. However, considering the water demand of the former hotel, the proposed project would –result in a net decrease of 6,756 gpd of water (see Table IV.O-3, Proposed Project Water Consumption). Water consumption for the proposed project was estimated utilizing wastewater generation factors. In order to present a conservative analysis, water consumption is assumed to be 120 percent of the wastewater generated for a given land use.

tion Rate ^a	Total Water Consumption (gpd)
ns/du/day	11,520
ns/du/day	18,240
ns/du/day	3,168
,000 sf/day	4,128
1,000 sf/day	2,520
Proposed Project	39,576
s/room/day	-46,332
Total	-6,756
	Total

Table IV.O-3Proposed Project Water Consumption

Notes:

du = *dwelling unit; sf* = *square feet; gpd* = *gallons per day*

^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005. Water consumption assumed to be 120% of wastewater generated for a given land use.

^b The proposed 43,000 sf of retail land uses is included in this table to represent a conservative estimate.

The existing 12-inch water mains under both Avenue of the Stars and Olympic Boulevard would serve the project site with potable water. There are no reclaimed water facilities within the vicinity. The proposed project would result in a net decrease in water consumption from the former hotel, and existing water

infrastructure and treatment facilities that serve the project site are considered to be adequate. Therefore, no construction of or expansion of infrastructure or water treatment facilities would be needed to accommodate the proposed project. Thus, there would be no impact on water supply systems.

Due to statewide drought conditions in the mid-1970s and late 1980s, there is a need for water conservation in periods of water shortage. The LADWP recommends that water should be conserved at all times, because efficient use of water allows increased water for use in dry years and makes water available for beneficial environmental uses. As such, the proposed project would install low-flow showerheads, toilets, and urinals.

The LADWP has stated that water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in water demand¹¹ and that sufficient water supplies are available to accommodate the proposed project.¹² This is particularly relevant because the proposed residential uses would actually consume less water than the hotel. The proposed project is within the City's growth projections, because the permitted density, according to the West Los Angeles Community Plan, is up to 55 dwelling units per net acre, which is below the proposed project's approximately 39 dwelling units per acre. Further, according to LADWP, the LAFP has adequate capacity to serve the proposed project. Finally, the LADWP has indicated in its Urban Water Management Plan that it will provide an adequate water supply to meet current and future growth until at least 2020.¹³ Therefore, no impacts related to water supply would occur.

Furthermore, as determined by the Los Angeles Fire Department (LAFD), the overall fire flow requirement for the proposed project is 12,000 gallons per minute (gpm) from any block fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure.¹⁴ Currently, water pressure and availability in the project area are sufficient to meet the LAFD's existing fire flow requirements as the proposed residential uses would actually call for similar fire flow requirements as are currently provided to the former hotel on the project site. Therefore, no impacts related to fire flow requirements would occur.

¹¹ Personal communication with the Nadia Dale, Los Angeles Department of Water and Power, August 12, 2005.

¹² Written correspondence from Charles Holloway, Los Angeles Department of Water and Power, August 8, 2005.

¹³ Los Angeles Department of Water and Power, Year 2000 Urban Water Management Plan, 2000.

¹⁴ Written correspondence from Douglas L. Berry, Assistant Fire Marshal, Bureau of Fire Prevention and Public Safety, City of Los Angeles Fire Department, September 21, 2005.

CUMULATIVE IMPACTS

The related projects evaluated in this cumulative impacts analysis comprise the planned or projected development identified in the related projects list (see Section II.B of this Draft EIR). The geographic context for cumulative analysis pertaining to water consumption entails the LADWP service area, thus, only those related projects planned for the City of Los Angeles are included in this cumulative discussion. The related projects primarily include residential, commercial retail, and office land uses. Implementation of the proposed project in combination with the 26 related projects identified within the LADWP service area would increase the water demand. As shown in Table IV.O-4, Cumulative Water Consumption, the estimated water consumption by the related projects in combination with the proposed project would be approximately 1,819,799 gallons per day. However, cumulative impacts are not expected to be significant for the reasons discussed below.

-				Total Daily
				Water
	Proposed Land Use	Size ^a	Generation Factor ^b	Consumption (gpd)
32	Retail	11,085 sf	96 gallons/1,000 sf/day	1,064
34	Condominiums	35 du	192 gallons/du/day	6,720
35	Apartments	19 du	192 gallons/du/day	3,648
	2,000 Beds	2,000 students	90 gallons/student/day	180,000
	NW Phase II	296,700 sf	180 gallons/1,000 sf/day	53,406
36	Physics & Astronomy Building	191,900 sf	180 gallons/1,000 sf/day	34,542
50	Research Center, Thermal storage	95,000 sf	24 gallons/1,000 sf/day	2,280
	Nanosystems Institute	166,000 sf	180 gallons/1,000 sf/day	29,880
	Health Center Replacement	1,710,000 sf	300 gallons/1,000 sf/day	513,000
37	Theater	106 seats	5 gallons/seat/day	530
	Retail	15,000 sf	96 gallons/1,000 sf/day	1,440
38	Restaurant	2,993 sf	360 gallons/1,000 sf/day	1,077
50	Medical Office	74,000 sf	300 gallons/1,000 sf/day	22,200
	Theater	1,135 seats	5 gallons/seat/day	5,675
39	Retail	115,000 sf	96 gallons/1,000 sf/day	11,040
	Apartments	350 du	192 gallons/du/day	67,200
40	Office	937,000 sf	180 gallons/1,000 sf/day	168,660
41	Apartments	19 units	192 gallons/du/day	3,648
41	Retail	6,100 sf	96 gallons/1,000 sf/day	586
42	Condominiums	93 units	192 gallons/du/day	17,856
43	Condominiums	119 du	192 gallons/du/day	22,848
44	Gas station with Mart	2 toilets	120 gallons/toilet/day	240
45	Studio Expansion	360,000 sf	96 gallons/1,000 sf/day	34,560
46	High School Expansion	32 students ^c	14 gallons/student/day	448
47	Office	508,600 sf	180 gallons/1,000 sf/day	91,548
48	Retail	71,000 sf	96 gallons/1,000 sf/day	6,816
49	Condominiums	483 du	192 gallons/du/day	92,736
50	Office	791,000 sf	180 gallons/1,000 sf/day	142,380

Table IV.O-4Cumulative Water Consumption

			1			
				Total Daily		
				Water		
	Proposed Land Use	Size ^a	Generation Factor ^b	Consumption (gpd)		
	Restaurant	32,023 sf	360 gallons/1,000 sf/day	11,528		
52	Retail	19,214 sf	96 gallons/1,000 sf/day	1,845		
52	Office	763,900 sf	180 gallons/1,000 sf/day	137,502		
	Cultural	10,675 sf	24/1,000 sf/day	256		
53	Private Middle School	0 students ^d	10 gallons/student/day	0		
	Condominiums	65 du	192 gallons/du/day	12,480		
54	Assisted Living	181 du	192 gallons/du/day	34,752		
	Retail	20,000 sf	96 gallons/1,000 sf/day	1,920		
62	Theater	2,340 seats	5 gallons/seat/day	11,700		
02	Shopping Center	723,466 sf	96 gallons/1,000 sf/day	69,453		
63	Apartments	36 du	192 gallons/du/day	6,912		
05	Retail	8,485 sf	96 gallons/1,000 sf/day	815		
64	Convenience Store	3,750 sf	96 gallons/1,000 sf/day	360		
65	Private School (9 th grade)	94 students	10 gallons/student/day	940		
66	Hotel	42 rooms	156 gallons/room/day	6,552		
		1,813,043				
		-6,756				
	Cumulative Total (I	Related Projects + Propos	ed Project + Ambient Growth)	1,819,799		
	N7					

Table IV.O-4 (Continued)Cumulative Water Consumption

Notes:

du = *dwelling unit; sf* = *square feet; gpd* = *gallons per day*

^{*a*} Residential uses assumed to contain average of 2 bedrooms; Gas station uses assumed to contain 2 toilets.

^b Source: City of Los Angeles, Bureau of Engineering, August 2, 2005. Water consumption assumed to be 120% of wastewater generated for a given land use.

^c Conservative estimate based on the peak hour trips information contained in the traffic report (included as Appendix H).

^d No student increase would result from the school modernization project.

^d Ambient growth represents 1.5% of the related projects through project buildout (2009).

The 26 related projects are all located within City of Los Angeles and would be provided water supply service by LADWP. With respect to ambient growth, as previously discussed, water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth water demand. The planned growth would include the ambient growth within the project vicinity.

Although the total cumulative water consumption is approximately 1,819,799 gpd, the proposed project would represent a decrease in water consumption when compared to the former hotel on the project site. Therefore, the incremental contribution of the proposed project represents a decrease in water consumption and would not contribute to the cumulative demand for water. As previously discussed, the design capacity of the LAFP is 600 mgd, and the LAFP's current average water flow is 475 mgd.

Therefore, the LAFP has a remaining capacity of approximately 125 mgd. The cumulative water treatment demand would be well within the design capacity of the LAFP, representing approximately 1.4 percent of the remaining capacity. Further, the other related projects would not require major water infrastructure improvements that could result in temporary construction-related impacts. Therefore, the cumulative impact of the related projects in combination with the proposed project on water treatment facilities would be less than significant.

Based on the foregoing discussion, the proposed project would not incrementally increase the cumulative water consumption and, therefore, would not result in a cumulative impact on water services and facilities.

MITIGATION MEASURES

Although the proposed project would have no impact on water supply, the following mitigation measures are recommended to ensure compliance with Sections 121.00 through 122.00 of the LAMC:

- (O.2-1) The project developer shall ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.
- (O.2-2) The project developer shall install either a "smart sprinkler" system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.
- (O.2-3) The project developer shall select and use drought-tolerant, low-water-consuming plant varieties to reduce irrigation water consumption.
- (O.2-4) The project developer shall install low-flush water toilets and water-saving showerheads in new construction. Low-flow faucet aerators should be installed on all sink faucets.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project would not have an impact on water supply. However, the implementation of the recommended mitigation measures are recommended to ensure compliance with the LAMC.

IV. ENVIRONMENTAL IMPACT ANALYSIS O. UTILITIES AND SERVICE SYSTEMS 3. SOLID WASTE

ENVIRONMENTAL SETTING

Within the City, solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. Single-family residential and limited multi-family residential refuse is collected by the Los Angeles Bureau of Sanitation (LABS). Waste generated by most multi-family residential sources and all commercial and industrial sources is collected by private contractors. Construction waste is also collected by private contractors.

Waste disposal sites or landfills are operated by both the City and the County of Los Angeles (County), as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger hauling trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a landfill's particular jurisdiction and/or wasteshed boundary; (2) tonnage permit limitations; and (3) operational constraints.

The City of Los Angeles is serviced by the Sunshine Canyon Landfill, Bradley Landfill and Chiquita Canyon Landfill. However, over 90 percent of the solid waste generated in the City of Los Angeles is disposed at the Sunshine Canyon Landfill in Sun Valley. All three landfills accept residential, commercial, and construction waste.

The Sunshine Canyon Landfill is jointly operated by the City and the County (each operates separate portions of the landfill). However, the City's permits to dispose solid waste in its portion of the Sunshine Canyon Landfill expired in 1991. In 1996, the City contracted with a private waste hauler to dispose its solid waste in the County portion of Sunshine Canyon Landfill. Currently, the City continues to contract with a private waste hauler to use the County's portion of the Sunshine Canyon Landfill to dispose of 3,500 tons of solid waste daily. In December 1999, the City approved Ordinance 172,933, which amended the Los Angeles Municipal Code to allow the City to expand the Sunshine Canyon Landfill and combine the City and County portions of the landfill.¹⁵ The plan approved in Ordinance 172,933 will allow the City to: (1) work with the County to combine the City and County portions of the landfill;¹⁶ (2) expand the landfill footprint to 194 acres in the City and 257 acres in the County; (3) increase capacity to

¹⁵ City of Los Angeles Ordinance 172,933 (amending LAMC Section 12.04) and its [Q] Qualified Conditions of Approval, approved December 10, 1999.

¹⁶ Ibid.

55 million tons in the City portion and increase the combined capacity of the City/County landfill to 90 million tons; (4) permit a daily maximum intake of 5,500 tons per day prior to the combining of the City and County portions of the landfill; (5) permit a combined City/County daily maximum intake of 11,000 tons following combining the City and County portions of the landfill;⁵ and (6) extend the estimated closure date to approximately 2029.¹⁷ The City has recently approved, and the California Integrated Waste Management Board (CIWMB) has concurred with, the solid waste facility permit for Phase I of that plan¹⁸, which initially permits a maximum capacity of 16 million tons (see Table IV.O-5).¹⁹

The Bradley Landfill is currently permitted to intake 10,000 tons per day of solid waste; however, it only has a remaining capacity to accept 383,140 tons of solid waste before its operational permit expires in 2007.²⁰ Therefore, the City is exploring plans to expand the Bradley Landfill in a two-phase process. The first phase is a transitional 43-foot vertical landfill expansion that will provide additional short-term disposal capacity within the boundaries of the existing landfill. The second phase will construct a 6,000 tons per day transfer station and a 1,000 tons per day Material Recovery Facility adjacent to the existing landfill to begin operation in 2007, after the landfill's permit expires. Since the permit for the Bradley Landfill expires in 2007 and it is not known whether or not the City's proposed plans for expansion will be accepted, for purposes of this analysis it is assumed that Bradley Landfill would not serve the proposed project.

In addition to the Sunshine Canyon and Bradley Landfills, the Chiquita Canyon Landfill accepts waste generated by construction activities in the project vicinity. The Chiquita Canyon Landfill is currently permitted to intake 6,000 tons per day of solid waste and receives approximately 4,940 tons per day. This indicates that the Chiquita Canyon Landfill is currently permitted to receive an additional 1,060 tons per day of solid waste (see Table IV.O-5, Landfill Capacity and Intake).

¹⁷ City of Los Angeles, Draft Subsequent Environmental Impact Report Sunshine Canyon Landfill, SEIR 91-0377-ZC/GPA, State Clearinghouse No. 92041053, July 1997.

¹⁸ Solid Waste Facility Permit No. 19-AR-0002-2.

¹⁹ California Integrated Waste Management Board Resolution 2003-289, May 13, 2003.

²⁰ Los Angeles County Department of Public Works, Environmental Programs Division, Los Angeles County Integrated Waste Management Plan, 2003 Annual Report, February 2005.

Landfill Facility	Estimated Closure Date ^a	Permitted Daily Intake (tons/day) ^a	Average Daily Intake (tons/day) ^a	Remaining Permitted Daily Intake (tons/day) ^a	
Sunshine Canyon Landfill ^a	2029	11,000	5,781	5,219	
Chiquita Canyon Landfill	2013	6,000	4,940	1,060	
Total Remaining Intake 6,279					

Table IV.O-5 Landfill Capacity and Intake

^a Source: Los Angeles County Department of Public Works, Environmental Programs Division, Los Angeles County Integrated Waste Management Plan, 2003 Annual Report, 2005. As complete buildout for the proposed project would occur by 2009, both the City and County portions of the landfill will be fully operational at that time. Therefore, data for the combined City and County portions of the landfill are shown.

Household Hazardous Waste

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.²¹ City and County residents can bring their HHW to "Hazmobile" collection sites. These sites are mobile and 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.

Additionally, the CIWMB has certified used oil collection locations throughout the State. These locations accept uncontaminated oil throughout the year. A list of the locations can be obtained from the Bureau of Sanitation or directly from the CIWMB.²²

Regulatory Framework

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to

²¹ Los Angeles City Bureau of Sanitation, "Household Hazardous Waste Collection Program," website: http://www.lacity.org/SAN, August 12, 2005.

²² *Ibid.*

maintain the 50 percent diversion specified by AB 939 past the year 2000. The City surpassed the Statemandated 50 percent diversion rate for the year 2000 and achieved a 58.8 percent diversion rate.²³ In addition, in 1999, the Mayor directed City departments to develop strategies to achieve the citywide recycling goal of 70 percent by 2020.²⁴

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of the Act, 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 CIWMB to update it on their progress toward the AB 939 goals. To date, implementation of AB 939 has proven to be a successful method of reducing landfill waste in the City.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact to solid waste services would occur if the landfill serving the proposed project did not have sufficient permitted capacity to accommodate the project's solid waste disposal needs and/or if it would not comply with federal, State and local statutes and regulations related to solid waste.

Furthermore, as set forth in the City of Los Angeles <u>Draft L.A. CEQA Thresholds Guide</u>, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- (b) Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and

²³ City of Los Angeles, AB 939 2000 Report, August 2001, page ES-1.

²⁴ City of Los Angeles Solid Resources Program Fact Sheet, November 2000, page III.

(c) Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Project Impacts

Short-Term Construction Impacts

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. Based on a construction generation rate of 4.38 pounds of waste for every square foot of new residential construction and 3.89 pounds of waste for every square foot of new nonresidential construction,²⁵ the construction of the proposed project is estimated to generate approximately 2,498,380 pounds (1,249 tons) of solid waste over the construction period.²⁶ Recycling of construction-related waste materials in compliance with AB 939 would substantially reduce this waste stream that would otherwise go to a landfill. Therefore, approximately 1,249,190 pounds (625 tons) of construction waste²⁷ would be disposed of in the landfills.

The remaining combined daily intake of the Sunshine Canyon and Chiquita Canyon Landfill is 6,279 tons per day. As such, they would have adequate capacity to accommodate the average daily construction waste of 625 tons generated by the proposed project over its approximately two-year construction period. Therefore, a less-than-significant impact associated with construction waste would occur.

Long-Term Operational Impacts

Operation of the proposed project would result in ongoing generation of solid waste. Over the long-term, the proposed project's 147 condominiums, 7,000-square-foot restaurant, and 27,000 square feet of resident-focused specialty uses or 43,000 square feet of private membership facilities would be expected to generate approximately 244 pounds or 0.122 tons of solid waste per day, or 44.53 tons per year (see Table IV.O-6, Proposed Project Solid Waste Generation). As discussed above, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent. In compliance with AB 939, the proposed project would include a resident recycling program. Thus, approximately 122 pounds (244/2) or 0.061

²⁵ USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998, page A-1.

²⁶ Based on approximately 526,000 square feet of residential uses and 50,000 square feet of non-residential uses ([526,000 x 4.38] + [50,000 x 3.89]).

²⁷ (2,498,380 pounds of solid waste generated by the proposed project)/2 per AB 939.

tons of the proposed project's total daily solid waste generation (or 22.27 tons per year) would be recycled rather than disposed of in a landfill. As such, the proposed project would generate 122 pounds or 0.061 tons of solid waste per day that would be disposed in local landfills.

As indicated in Table IV.O-5, the Sunshine Canyon Landfill is permitted to receive 11,000 tons per day and currently receives 5,781 tons per day. Therefore, the Sunshine Canyon Landfill can receive the additional 0.061 tons per day before it reaches its permitted daily capacity. If the entire 122 pounds or 0.061 tons per day of solid waste generated by the proposed project was disposed of in the Sunshine Canyon Landfill, the Sunshine Canyon Landfill would have more than enough permitted capacity to accommodate this additional contribution of less than one tenth of one ton per day.

Land Use		Deily Concretion Date	Total Daily Solid Waste
Land Use	Size	Daily Generation Rate ^a	Generation (lbs)
Condominiums	147 units	4 lbs/unit	588
Retail ^b	43,000 sf ^b	5 lbs/1,000 sf	215
Restaurant	7,000 sf	5 lbs/1,000 sf	35
		Subtotal Proposed Project	838
Former Hotel	-297 rooms	2 lbs/room	-594
		Total	244
materials discarded, whether	es Bureau of Sanitation, So or not they are later recy	olid Waste Generation, 1981. Waste g cled or disposed of in a landfill. l in this table to represent a conservat	

Table IV.O-6 Proposed Project Solid Waste Generation

Although landfill capacity in the City is limited and any addition to the overall waste stream would reduce the City's overall landfill capacity, the Sunshine Canyon Landfill has sufficient remaining capacity for its current solid waste intake and the proposed project's intake for the foreseeable future. Furthermore, as discussed above, the City is currently exploring plans to construct or purchase additional solid waste facilities, which would increase total landfill capacity in the City. Although other landfills in Los Angeles County are near capacity, potential capacity may become available through expansion of the Bradley Landfill and/or Puente Hills Landfill, conversion of waste-to-energy and through the use of waste-by-rail to landfills outside of Los Angeles County (e.g., the proposed Eagle Mountain Landfill in Riverside County). As the long-term residential solid waste that would be generated by the proposed project could be accommodated at the Sunshine Canyon Landfill without causing the landfill to exceed its permitted daily capacity in the foreseeable future, the proposed project's long-term impact on solid waste facilities is considered to be less than significant.

The proposed project may also generate a variety of common household hazardous wastes that could adversely affect existing hazardous waste management facilities in both the City and Los Angeles

County. These wastes may be disposed of by the residents at any of the hazardous materials pickup sites offered by the County.

CUMULATIVE IMPACTS

The related projects evaluated in this cumulative impacts analysis comprise the planned or projected development identified in the related projects list (see Section II.B of this Draft EIR). The geographic context for cumulative analysis pertaining to solid waste generation entails the LABS service area, thus, only those related projects planned for the City of Los Angeles are included in this cumulative discussion. The related projects primarily include residential, commercial retail, and office land uses. Implementation of the proposed project in combination with the 26 related projects identified within the LABS service area would increase the solid waste generation. As shown in Table IV.O-7, Cumulative Solid Waste Generation, the estimated solid waste generation by the related projects in combination with the proposed project would be approximately 768,796 pounds (384 tons) per day. However, cumulative impacts are not expected to be significant for the reasons discussed below.

No.	Proposed Land Use	Size	Generation Factor ^a	Total Daily Solid Waste Generation (lbs/day)
32	Retail	11,085 sf	5 lbs/1,000 sf/day	55
34	Condominiums	35 units	4 lbs/unit/day	140
35	Apartments	19 units	4 lbs/unit/day	76
	2,000 Beds	2,000 units	4 lbs/unit/day	8,000
	NW Phase II	296,700 sf	6 lbs/1,000 sf/day	1,780
36	Physics & Astronomy Building	191,900 sf	6 lbs/1,000 sf/day	1,151
50	Research Center, Thermal storage	95,000 sf	6 lbs/1,000 sf/day	570
	Nanosystems Institute	166,000 sf	6 lbs/1,000 sf/day	996
	Health Center Replacement	1,710,000 sf	7 lbs/1,000 sf/day	11,970
37	Theater	12,900 sf	5 lbs/1,000 sf/day	65
	Retail	15,000 sf	5 lbs/1,000 sf/day	75
38	Restaurant	2,993 sf	5 lbs/1,000 sf/day	15
30	Medical Office	74,000 sf	7 lbs/1,000 sf/day	518
	Theater	136,200 sf ^b	5 lbs/1,000 sf/day	681
39	Retail	115,000 sf	5 lbs/1,000 sf/day	575
39	Apartments	350 units	4 lbs/unit/day	1,400
40	Office	937,000 sf	6 lbs/1,000 sf/day	5,622
41	Apartments	19 units	4 lbs/unit/day	76
41	Retail	6,100 sf	5 lbs/1,000 sf/day	31
42	Condominiums	93 units	4 lbs/unit/day	372
43	Condominiums	119 units	4 lbs/unit/day	476
44	Gas station with Mart	^c	^c	0
45	Studio Expansion	360,000 sf	5 lbs/1,000 sf/day	1,800
46	High School Expansion	14,800 sf	7 lbs/1,000 sf/day	104

Table IV.O-7Cumulative Solid Waste Generation

				Total Daily Solid Waste Generation	
No.	Proposed Land Use	Size	Generation Factor ^a	(lbs/day)	
47	Office	508,600 sf	6 lbs/1,000 sf/day	3,052	
48	Retail	71,000 sf	5 lbs/1,000 sf/day	355	
49	Condominiums	483 units	4 lbs/unit/day	1,932	
50	Office	791,000 sf	6 lbs/1,000 sf/day	4,746	
	Restaurant	32,023 sf	5 lbs/1,000 sf/day	160	
52	Retail	19,214 sf	5 lbs/1,000 sf/day	96	
32	Office	763,900 sf	6 lbs/1,000 sf/day	4,583	
	Cultural	10,675 sf	5 lbs/1,000 sf/day	53	
53	Private Middle School	122,000 sf	7 lbs/1,000 sf/day	854	
	Condominiums	65 units	4 lbs/unit/day	260	
54	Assisted Living	181 units	4 lbs/unit/day	724	
	Retail	20,000 sf	5 lbs/1,000 sf/day	100	
62	Theater	280,800 sf ^b	5 lbs/1,000 sf/day	1,404	
02	Shopping Center	723,466 sf	5 lbs/1,000 sf/day	3,617	
63	Apartments	36 units	4 lbs/unit/day	144	
05	Retail	8,485 sf	5 lbs/1,000 sf/day	42	
64	Convenience Store	3,750 sf	5 lbs/1,000 sf/day	19	
65	Private School (9 th grade)	42,000 sf	7 lbs/1,000 sf/day	294	
66	Hotel	42 rooms	2 lbs/room/day	84	
		Re	elated Project Subtotal	59,067	
		244			
			Ambient Growth ^d	709,485	
	Cumulative Total (Related Pro	ect + Ambient Growth)	768,796		
Notes	Notes:				

Table IV.O-7 (Continued) Cumulative Solid Waste Generation

Notes:

du = *dwelling unit; sf* = *square feet; lbs* = *pounds*

^a Source: City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

^b Calculated based on an average of 1 seat/120 sf of theater uses.

^c The amount of solid waste generated by a gas station is minimal, as individuals only use the site for a short amount of time while fueling up their vehicles.

^d Ambient growth represents 1.5% per year of the solid waste received at the Sunshine Canyon Landfill through project buildout (2009).

The Sunshine Canyon Landfill is permitted to receive up to 11,000 tons of solid waste each day from the City of Los Angeles. The Sunshine Canyon Landfill currently receives approximately 5,781 tons of solid waste daily from the City and has a remaining daily capacity of 5,219 tons. Assuming that all of the cumulative solid waste is sent to the Sunshine Canyon Landfill with no waste stream diversion, the additional 384 tons per day would not cause the Sunshine Canyon Landfill to exceed its permitted daily capacity from the City. As previously discussed, additional capacity to accommodate the cumulative

disposal needs of the proposed project and related projects may become available as the City develops solutions to meet the future disposal needs at a regional level (e.g., expanding existing landfills, transporting waste to other landfills, converting waste to energy, recycling, and waste reduction). Furthermore, similar to the proposed project, the related projects would be subject to the requirements of AB 939 (i.e., divert 50 percent of the solid waste generated from landfills through waste reduction, recycling and composting). Consequently, the proposed project would not have a cumulatively considerable incremental effect on solid waste facilities and the proposed project's cumulative solid waste impact would be less than significant.

MITIGATION MEASURES

The proposed project's impacts on the City's solid waste disposal facilities would be less than significant and mitigation measures are, therefore, not required. Nonetheless, the following measures are recommended to further reduce the proposed project's already less-than-significant short-term construction-related solid waste impacts:

- (O.3-1) In compliance with AB 939, the construction contractor shall only contract for waste disposal services with a company that recycles construction-related wastes.
- (O.3-2) In compliance with AB 939, to facilitate the onsite separation and recycling of constructionrelated wastes, the construction contractor should provide temporary waste separation bins onsite during construction.

The following mitigation measure is recommended to further reduce the proposed project's already lessthan-significant long-term solid waste impacts:

(O.3-3) In compliance with AB 939, to support recycling of operational wastes, the proposed project would include a residential recycling program.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts on the City's solid waste disposal facilities would be less than significant without mitigation. However, implementation of the recommended mitigation measures would further reduce the proposed project's impacts.