1. **INTRODUCTION**

This section describes the handling and disposal of solid waste under current conditions and evaluates changes resulting from implementation of the proposed Project and associated impacts on solid waste collection programs and disposal facilities that serve the Project site. This section also discusses regulations governing solid waste disposal, including those intended to minimize the volume of solid waste requiring landfill disposal, such as relevant state legislation and City/County recycling programs.

2. **REGULATORY FRAMEWORK**

a. **State Regulations**

i. **California Integrated Waste Management Act of 1989 (AB 939)**

In response to reduced landfill capacity, the State of California passed Assembly Bill (AB) 939, the California Integrated Waste Management Act, in 1989. This legislation requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, re-use, and waste prevention efforts. AB 939 also established the California Integrated Waste Management Board (CIWMB), the state agency designated to oversee, manage, and track California's solid waste generation each year.

AB 939 requires jurisdictions to maintain 50 percent waste diversion. The purpose of AB 939 is to “reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible.” AB 939 requires jurisdictions to utilize “integrated waste management”—a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the least adverse impact on human health and the environment.

ii. **Model Ordinance for Recycling in Development Projects (AB 1327)**

AB 1327, the California Solid Waste Reuse and Recycling Act,\(^1\) was adopted in 1991 and directed the California Integrated Waste Management Board to approve a model ordinance for adoption by local governments addressing storage for recyclable materials for proposed development projects by March 1, 1993. In response to this legislation, the City of Los Angeles adopted the Space Allocation Ordinance in 1997 (see Local Regulations, City of Los Angeles Municipal Code, below).

---

\(^1\) PRC Sections 42900-42911.
iii. Construction and Demolition Waste Materials Diversion (SB 1374)

Senate Bill (SB) 1374, Construction and Demolition Waste Materials Diversion Requirements, requires that jurisdictions include in their annual AB 939 reports a summary of progress realized in diverting construction and demolition waste from the waste stream.\(^2\) SB 1374 required the California Integrated Waste Management Board (CIWMB) to develop and adopt a model construction and demolition diversion ordinance by March 1, 2004, for voluntary implementation by local jurisdictions. The legislation also requires that CIWMB report on other methods and programs to increase diversion of construction and demolition debris, for implementation by local governments and general contractors.

iv. California Green Building Standards Code (CALGreen)

Effective January 1, 2011, the State's Green Building Code, part of Title 24, the California Building Standards Code, requires developers of newly constructed buildings to develop a waste management plan to divert 50 percent of the construction waste generated by Project construction.\(^3\) Builders or developers are required to submit a construction waste management plan to the appropriate jurisdiction’s enforcement agency. The City of Los Angeles adopted and recently modified its green building ordinance to be consistent with the CALGreen Code (see Local Regulations, City of Los Angeles Green Building Code, below).

b. County Regulations

i. County of Los Angeles Integrated Waste Management Plan (ColWMP)

The Los Angeles County Integrated Waste Management Plan (ColWMP), approved by the CIWMB in June 1999, is a set of planning documents that sets forth a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The ColWMP recognizes that landfills will remain an integral part of the County’s solid waste management system in the foreseeable future and assures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939.

The ColWMP includes approaches such as source reduction, recycling and composting programs, household hazardous waste management programs and public education awareness programs. The

---

\(^2\) PRC Section 42912.

plan concludes that landfiling will remain an integral part of the waste management system and calls for the establishment of 50 years of in-County permitted landfill capacity, as well as the County's support for the development of disposal facilities out of the County.4

The County continually evaluates landfill needs and capacity through the preparation of CoIWMP annual reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part, by determining the available landfill capacity. Landfill capacity is determined by several factors including: (1) the expiration of various landfill permits (e.g., land use permits, waste discharge requirements permits, solid waste facilities permits, and air quality permits); (2) restrictions to accept waste generated only within a landfill's particular jurisdiction and/or watershed boundary; and (3) operational constraints. The most recent annual report was completed for 2009.

As part of the CoIWMP, the County prepared the Countywide Siting Element, which identifies goals, policies, and strategies for the proper planning and siting of solid waste disposal and transformation facilities for the next 15 years. The Siting Element was approved by CalRecycle in June 1998. The County is currently updating the Siting Element to reflect remaining landfill disposal capacity and the County's current strategy for maintaining adequate disposal capacity. The update is anticipated to be complete in Fall 2013.5

c. Local Regulations

i. City of Los Angeles Solid Waste Management Policy Plan

The 1993 City of Los Angeles Solid Waste Management Policy Plan is the long-range solid waste management policy plan for the City; the Source Reduction and Recycling Element, updated annually, is the strategic action policy plan for diverting solid waste from landfills. The Solid Waste Management Policy Plan consists of a residential curbside program and a commercial technical assistance program, and provides that the remaining waste be disposed in local and possibly remote landfills.

The Solid Waste Management Policy Plan has established the objective of reducing at the source or recycling a minimum of 50 percent of the City's waste by the year 2000 or as soon as possible thereafter. Additionally, the Solid Waste Management Policy Plan has established a Citywide waste

---

IV.M.3 Solid Waste

diversion objective of 70 percent by 2020. The Solid Waste Management Policy Plan is incorporated into solid waste management planning and ensures that disposal practices do not conflict with diversion goals.

The following five goals of the Solid Waste Management Policy Plan reflect the importance of source and materials recovery and, thus, 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 and 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 be collected, transferred, and disposed of in a manner that minimizes 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's Source Reduction and Recycling Element serves as a guidance document and strategic action plan for diverting solid waste from landfills. The source reduction, recycling, composting, special waste, and public education goals are defined by specific programmatic elements including tasks, roles, responsibilities, and an implementation schedule. The City is currently in the process of developing the Solid Waste Integrated Resources Plan, a 20-year master plan that would supersede the existing City of Los Angeles Solid Waste Management Policy Plan and achieve City's goal of becoming a zero waste city by 2030. The Solid Waste Integrated Resources Plan is expected to be completed in 2013.
ii. City Solid Resources Infrastructure Strategy Facilities Plan

In accordance with the requirements of AB 939, the City’s Bureau of Sanitation prepared the Solid Resources Infrastructure Strategy Facilities Plan in 2000, which describes the City’s initial orientation towards solid waste collection and disposal and more recent emphasis on the collection and recycling of what are now termed solid resources. The Plan recommends the development of additional infrastructure for the future management of solid resources, including 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;
- Develop permanent Household Hazardous Waste (HHW) drop-off facilities for City residents to provide year-round services and encourage safe disposal of these materials;
- Continue to pursue the development of yard trimmings processing, mulching and shipping facilities and marketing of the finished product within the City; 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.

iii. RENEW LA

In February 2006, the Los Angeles City Council adopted a report entitled Recovering Energy Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) as a guide for solid waste and resource management for the City of Los Angeles over the next 20 years. The plan builds on key elements of existing programs and infrastructure and new conversion technology to achieve an overall diversion rate of 90 percent or more by 2025. The plan seeks to achieve higher levels of resource recovery in the form of recyclables, soil amendments, renewable fuels, chemicals, green energy, and a reduction in the quantity of residue material disposed of in landfills. The efforts rely on the enhancement and growth of existing diversion programs, and the development of conversion technology facilities to process refuse that is currently not reused or recycled.

RENEW LA predicts that by 2025 the City of Los Angeles will have seven conversion technology facilities, each with a capacity of up to 3,000 tons per day per facility, for a combined capacity of 14,500 tons per day. The City of Los Angeles Bureau of Sanitation is currently reviewing
submissions of proposals from development partners for processing municipal solid waste utilizing alternative technologies during resource recovery.6

iv. General Plan Framework Element

The City of Los Angeles General Plan Framework Element is a plan for long-term growth that establishes a Citywide context to guide the update of Community Plans and other Citywide General Plan Elements. The Framework Element includes an Infrastructure and Public Services Chapter in response to State requirements to plan for adequate infrastructure in the future. The Framework Element discusses numerous programs the City has implemented to divert waste from disposal facilities, including source reduction programs (e.g., home composting and the Curbside Recycling Program, which collects co-mingled recyclables and green waste for all single-family and a limited number of multi-family complexes in the City). The Framework Element states 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 facilitate the implementation of a comprehensive recycling system.

To accommodate solid waste remaining after diversion, the Framework Element acknowledges that the City will have a continuing need for solid waste transfer and disposal facilities. In acknowledgment of the very limited capacity of landfills located in Los Angeles, the Framework Element states that more transfer facilities will be needed to transfer waste from the collection vehicles to other, more remote facilities. It also recognizes that capacity must exist to accommodate waste collected by City agencies as well as private collection companies, and identifies several landfill facilities that may be accessed by truck and train.7

v. City of Los Angeles Space Allocation Ordinance

The City adopted the Space Allocation Ordinance (Ordinance No. 171,687) in 1997 in response to AB 1327, which required local jurisdictions in California to adopt ordinances requiring space for the storage of recyclable materials to be accommodated within new development. As set forth in the ordinance, all eligible new development, including residential development projects of four or more units where the proposed increase in floor area is 25 percent or more, or any other development

---


project where the proposed floor area increase is 30 percent or more, is required to provide an adequate recycling area or room for the collection and removal of recyclable materials.

vi. City of Los Angeles Construction and Demolition (C&D) Waste Recycling Ordinance

In order to meet the waste diversion goals of AB 939 and the requirements of SB 1374 pertaining to construction and demolition waste, and to mandate the recycling of construction and demolition waste, the City of Los Angeles adopted the Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance 181,519, which amended Los Angeles Municipal Code (LAMC) Sections 66.32 through 66.32.5), effective on January 1, 2011. This ordinance requires that all solid waste haulers and contractors obtain a permit prior to transporting C&D waste, and stipulates that C&D waste may only be processed at City-certified C&D waste-processing facilities.8

vii. Los Angeles Green Code

In December 2010, the Los Angeles City Council adopted the CALGreen code as Ordinance No. 181,480, with amendments, thus codifying provisions of CALGreen as the new Los Angeles Green Code (LA Green Code).9 The LA Green Code is applicable to the construction of new buildings (residential and nonresidential), building alterations with a permit valuation of over $200,000, and residential and nonresidential building additions, unless otherwise noted. Section 99.04.408.1 of the Green Building Code addresses construction waste reduction, disposal, and recycling, and requires construction waste reduction of at least 50 percent, in compliance with LAMC Section 66.32 (the Construction and Demolition (C&D) Waste Recycling Ordinance). Section 99.05.408.4 mandates that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For phased projects, if approved by the City's Department of Building and Safety, these materials may be stockpiled on the project site until a storage site is developed.

viii. City of Los Angeles Source Reduction of Waste Ordinance

LAMC Section 12.43 (added by Ordinance 170,978 in 1996) lists the following requirements for new development projects, with the goal of reducing the amount of solid waste generated by landscaped areas:

---

8 LAMC Sections 66.32 through 66.32.5.
**IV.M.3 Solid Waste**

- If any landscape includes grass, all grass clippings shall be recycled on- or off-site, and shall not be introduced into the off-site waste stream;

- If a lot is 7,500 square feet or greater, all vegetative waste, except that which is not appropriate to recycle, shall be recycled on- or off-site and shall not be introduced into the off-site waste stream; and

- In any landscape with lawn area greater than 15 percent of the planted area, all lawn area waste shall be recycled on- or off-site.

### 3. EXISTING CONDITIONS

#### a. Los Angeles County Solid Waste Collection and Disposal

The City of Los Angeles Bureau of Sanitation provides solid waste services to the City of Los Angeles. The Bureau of Sanitation develops plans and strategies to manage solid waste (including hazardous waste) generated in the City and addresses the disposal needs of the City as a whole. The Bureau of Sanitation also provides solid waste collection services for single-family and small multi-family residences. Larger multi-family residences, such as apartment complexes and condominiums, and commercial, institutional, and industrial facilities contract with private companies to collect and transport materials for disposal and recycling.

There are three types of disposal facilities for non-hazardous waste within Los Angeles County: Class III Landfills (Municipal Solid Waste Landfills); Unclassified (Inert) Landfills; and Transformation (waste to energy) Facilities. A Class III Landfill accepts non-hazardous household waste. Unclassified Landfills accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Transformation Facilities involve the incineration, pyrolysis, destructive distillation, gasification, or the chemical or biological processing of municipal solid waste in order to generate energy, reduce volume, or produce synthetic fuel. Prior to disposal, Materials Recovery Facilities recover recyclable materials from waste to provide for the efficient transfer of the residual waste to permitted landfills for proper disposal. Hazardous waste cannot be disposed of at Class III or Unclassified Landfills. The California Hazardous Waste Control Law requires that these hazardous materials be transported and disposed of or treated at a licensed facility.  

For more information on hazardous waste, refer to **Section IV.F, Hazards.**

---

b. Countywide Solid Waste Generation

In 2009, jurisdictions within Los Angeles County, including the City of Los Angeles, disposed a total of 6,778,746 tons of solid waste at the County's Class III Landfills. Additionally, these jurisdictions sent 537,012 tons of solid waste to transformation facilities and 87,390 tons of solid waste to permitted inert landfills, and exported 1,779,290 tons to out-of-County landfills. Collectively, Los Angeles County jurisdictions disposed of a total of 9,095,048 tons of solid waste in County landfills in 2009 (excluding inert waste). Assuming an estimated Countywide waste diversion rate of 55 percent, 12 County jurisdictions are estimated to have generated approximately 20,211,219 tons of solid waste (excluding inert waste) in 2009. On average, residential waste accounted for 27 percent of this waste stream, while non-residential waste accounted for 73 percent.

i. Solid Waste Recycling, Conversion, Reduction, and Diversion

According to the City of Los Angeles Solid Resources Infrastructure Strategy Facilities Plan, the infrastructure and programs that are planned for the City of Los Angeles emphasize the practices of recycling and source reduction in order to achieve a 70 percent diversion rate by 2020. In 2002, the most recent data available, the City of Los Angeles is estimated to have achieved an actual diversion rate of 62 percent.

On Aug. 18, 2005, a task force was assembled by the Sanitation District adopted the Conversion Technology Evaluation Report, which evaluated hundreds of technologies. The Conversion Technology Evaluation Report detailed a step-by-step plan to develop a Conversion Technology Demonstration Facility, which could validate the technical, environmental, and economic feasibility of conversion technologies; provide a showcase for interested parties; and yield tangible support data for future development.

The goals of the Southern California Conversion Technology Demonstration Project are to:

---

IV.M.3 Solid Waste

- Educate about solid waste challenges;
- Support organizations working toward zero-waste;
- Evaluate and promote the development of conversion technologies to recover energy and products from waste; and
- Work with communities in Southern California to create a demonstration conversion technology facility.

Conversion technologies include a variety of thermal, chemical, and biological processes, such as incineration, pyrolysis, destructive distillation, and gasification (discussed above), that break down solid waste into usable resources such as ethanol, biodiesel and other green fuels.

The County of Los Angeles closed the Phase III/IV Request for Proposals for the Conversion Technology Project on January 15, 2009. Phase III is the development of a demonstration facility, and Phase IV is the siting of commercial facilities in Los Angeles County.\(^{17}\)

The Class III Landfills that currently accept waste generated within the City of Los Angeles and collected by the City of Los Angeles Bureau of Sanitation are the Calabasas Landfill in Los Angeles County,\(^{18}\) the Sunshine Canyon Landfill in Los Angeles County, and the El Sobrante Landfill in Riverside County.\(^{19}\) Waste generated within the City of Los Angeles and collected by private haulers may be taken to additional facilities, including the Antelope Valley Landfill in Los Angeles County, Chiquita Canyon Landfill in Los Angeles County, Lancaster Landfill in Los Angeles County, and out-of-County landfills such as the Frank R. Bowerman, Olinda Alpha, and Prima Deshecha Sanitary Landfills in Orange County, and the Simi Valley Landfill & Recycling Center in Ventura County.

The Class III Landfills that accept waste generated within the City of Los Angeles are identified in Table IV.M.3-1, In-County Class III Landfills Serving the City of Los Angeles and Table IV.M.3-2, Out-of-County Class III Landfills Available for Use by the City of Los Angeles. No in-County or out-of-County landfills accept waste exclusively generated by the City of Los Angeles. Rather, the landfills identified in Tables IV.M.3-1 and IV.M.3-2 accept waste from around Los Angeles County, including

---


\(^{18}\) Disposal at the Calabasas Landfill is limited to waste generated within the portion of the City west of the San Diego Freeway (I-405) and north of Sunset Boulevard, and several unincorporated communities.

\(^{19}\) Correspondence with Dave Thompson, City of Los Angeles Environmental Affairs Department, November 24, 2008.
### Table IV.M.3-1
In-County Class III Landfills Serving the City of Los Angeles

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Antelope Valley Landfills I and II</td>
<td>3,200</td>
<td>1,133</td>
<td>0.353</td>
<td>8.69(^1)</td>
</tr>
<tr>
<td>Calabasas Landfill</td>
<td>3,500</td>
<td>1,487</td>
<td>0.464</td>
<td>8.17</td>
</tr>
<tr>
<td>Chiquita Canyon Landfill</td>
<td>6,000</td>
<td>4,946</td>
<td>1.543</td>
<td>9.52(^2)</td>
</tr>
<tr>
<td>Lancaster Landfill</td>
<td>1,700</td>
<td>1,337</td>
<td>0.417</td>
<td>13.80</td>
</tr>
<tr>
<td>Sunshine Canyon Landfill(^3)</td>
<td>12,100</td>
<td>5,742</td>
<td>1.792</td>
<td>13.13(^4)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,596</strong></td>
<td><strong>53.31</strong></td>
<td><strong>53.31</strong></td>
<td></td>
</tr>
</tbody>
</table>


\(^1\) The landfill operator/owner is currently seeking approvals for a proposed expansion to the Antelope Valley Landfill that would result in an additional 8.96 million tons of capacity.

\(^2\) In October 2004, the Chiquita Canyon Landfill owner/operator submitted an application for a new Conditional Use Permit (CUP), which is currently being reviewed. The CUP proposes a horizontal and vertical expansion of about 32 million tons to the Chiquita Canyon Landfill.

\(^3\) Sunshine Canyon Landfill is located partially within the City of Los Angeles and partially within unincorporated Los Angeles County. Both portions of the landfill accept waste generated within the City of Los Angeles.

\(^4\) Although not reflected in the 2007 Annual Report calculations on which this table is based, on June 17, 2008, the CIWMB concurred in the issuance of a new solid waste facilities permit for the Sunshine Canyon City/County Landfill that increased its capacity to 67.7 million tons and extended its life by 30 years. On July 7, 2008 the CIWMB issued this permit to the facility operator. (Source: CalRecycle, “Sunshine Canyon Landfill Permit Process;” http://www.calrecycle.ca.gov/SWFacilities/Permitting/Notices/SunshineCnyn/default.htm. 2010)

the City of Los Angeles. Landfills located in Los Angeles County that do not accept waste from the City of Los Angeles, but do accept waste from other jurisdictions within the County, are not listed in these tables.

As of January 2008, the five landfills in Los Angeles County that serve the City of Los Angeles have a combined remaining capacity of approximately 53.31 million tons, as shown in Table IV.M.3-1. This estimate of remaining in-County landfill capacity does not reflect several expansions that have either been approved or are currently being pursued. Significant expansions have been proposed to the capacities of the Antelope Valley Landfill (adding 8.96 million tons) and the Chiquita Canyon Landfill (adding 32 million tons), while the Sunshine Canyon Landfill was approved for a 67.7 million ton expansion in June 2008.
### IV.M.3 Solid Waste

#### Table IV.M.3-2
Out-of-County Class III Landfills Available for Use by Jurisdictions in Los Angeles County

<table>
<thead>
<tr>
<th>Landfill</th>
<th>Maximum Total Daily Capacity (tons)</th>
<th>Average Total Daily Disposal in 2007 (tons)</th>
<th>Average Daily Imports from Los Angeles County in 2007 (tons)</th>
<th>Maximum Daily Imports from Los Angeles County (^3) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>El Sobrante Landfill (Riverside County)</td>
<td>10,000</td>
<td>7,080</td>
<td>2,723</td>
<td>4,000</td>
</tr>
<tr>
<td>Frank R. Bowerman Sanitary Landfill (Orange County)(^1)</td>
<td>8,500</td>
<td>6,700</td>
<td>834</td>
<td>1,500</td>
</tr>
<tr>
<td>Olinda Alpha Sanitary Landfill (Orange County)(^1)</td>
<td>8,000</td>
<td>6,100</td>
<td>1,314</td>
<td>1,500</td>
</tr>
<tr>
<td>Prima Deshecha Sanitary Landfill (Orange County)(^1)</td>
<td>4,000</td>
<td>1,900</td>
<td>258</td>
<td>1,500</td>
</tr>
<tr>
<td>Simi Valley Landfill &amp; Recycling Center (Ventura County)</td>
<td>3,000</td>
<td>2,500</td>
<td>756</td>
<td>750</td>
</tr>
<tr>
<td>Other Out-of-County Landfills(^2)</td>
<td>--</td>
<td>--</td>
<td>462</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>6,347</strong></td>
<td><strong>9,250</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


\(^1\) Imported waste tonnage is received under 10-year contracts with franchise waste haulers. The current contracts with the Frank R. Bowerman Sanitary Landfill and Prima Deshecha Sanitary Landfill allow disposal through 2015. The current contract with the Olinda Alpha Sanitary Landfill allows disposal through 2013.

\(^2\) Waste exported to facilities in other counties including Kern, Kings, San Diego, and Stanislaus Counties.

\(^3\) Maximum imports allowed under current contracts between Los Angeles County and out-of-County landfill operators.

As shown in Table IV.M.3-2, Los Angeles County jurisdictions, including the City of Los Angeles, collectively send an average of 6,347 tons per day (tpd) of Class III solid waste to out-of-County landfills, and are permitted by contractual agreements to send up to 9,250 tpd of such waste to these landfills.

However, the long-term availability of out-of-County landfill capacity is subject to the terms of future contractual agreements. Data presented in Table IV.M.3-2 does not reflect the additional capacity that would be provided by operation of the Eagle Mountain Landfill in Riverside County\(^20\) or the Mesquite Regional Landfill in Imperial County.\(^21\) Together, these landfills would provide Los

\(^20\) Eagle Mountain Landfill is fully permitted. However, the purchase of Eagle Mountain Landfill by the County Sanitation Districts of Los Angeles County and its eventual operation are contingent upon successful resolution of pending federal litigation.

\(^21\) Mesquite Regional Landfill is fully permitted.
Angeles County with an additional solid waste capacity of 30,000 tons per day, or approximately 9.36 million tons per year for 100 years.\textsuperscript{22}

The 2008 Annual Report for the Los Angeles County Countywide Integrated Waste Management Plan, estimates that annual Countywide solid waste generation will increase from approximately 23 million tons in 2007 to approximately 34 million tons in 2022. Assuming an annual waste diversion rate of 50 percent, the estimated total Class III Landfill disposal capacity need during this 15-year planning period is 213.8 million tons.\textsuperscript{23} As of January 1, 2008, the remaining permitted capacity of all Class III landfills in the County (including those that do not accept waste from the City of Los Angeles) was estimated at 91.4 million tons (147.2 million cubic yards). Therefore, the Class III Landfill disposal need would exceed the existing remaining permitted Class III Landfill capacity sometime during the year 2014 if no additional facilities or expansions are implemented.\textsuperscript{24}

Proposed and approved landfill expansions and new facilities are summarized in Table IV.M.3-3, Proposed or Approved Class III Landfill Expansions and Future Landfills.

\textbf{ii. Unclassified (Inert) Landfills}

As shown in Table IV.M.3-4, Permitted Unclassified Landfills, as of January 1, 2008, the remaining permitted combined Unclassified landfill capacity in Los Angeles County was estimated at approximately 51 million tons. At the 2007 average rate of disposal of 440 tons per day (0.137 million tons per year), this capacity would be exhausted in 372 years.\textsuperscript{25} Accordingly, the County currently has adequate permitted unclassified inert waste disposal capacity. In addition to the three permitted facilities identified in Table IV.M.3-4, numerous unclassified landfills accepting inert debris are located throughout Los Angeles County. These landfills are typically old mines or quarries that are being refilled, or canyons and gullies that are being filled. Available facilities include the Nu-Way Live Oak Reclamation Facility, Reliance Pit No. 2, Peck Road Gravel Pit, Irwindale Live Oak Ave., Strathern Sanitary Landfill, Calmat Class III Disposal Site, and Vulcan Inert Landfill, among others.\textsuperscript{26}

\begin{footnotesize}
\begin{itemize}
\item[22] Estimate of annual capacity is based on disposal of 30,000 tons per day (maximum permitted), six days per week.
\item[23] Calculated by multiplying the mid-point of 23 million and 34 million (e.g., 28.5 million) by 15, and then taking 50% of the product: \((23 \text{ million} + 34 \text{ million})/2 \times 15 \times 0.5\) = 213.8 million.
\item[24] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2008 and 2009 Annual Reports.
\item[25] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2008 Annual Report, Appendix E-2, Table 1.
\end{itemize}
\end{footnotesize}
### Table IV.M.3-3

Proposed or Approved Class III Landfill Expansions and Future Landfills

<table>
<thead>
<tr>
<th>Landfill</th>
<th>Remaining Permitted Capacity as of January 2008 (million tons)</th>
<th>Expansion (million tons)</th>
<th>Estimated Capacity After Expansion (million tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antelope Valley Landfills I and II (Los Angeles County)</td>
<td>8.69</td>
<td>8.96</td>
<td>17.65</td>
</tr>
<tr>
<td>Chiquita Canyon Landfill (Los Angeles County)</td>
<td>9.52</td>
<td>32.0</td>
<td>41.52</td>
</tr>
<tr>
<td>Eagle Mountain Landfill (Riverside County)</td>
<td>--</td>
<td>600</td>
<td>600</td>
</tr>
<tr>
<td>Mesquite Regional Landfill (Imperial County)</td>
<td>--</td>
<td>708</td>
<td>708</td>
</tr>
<tr>
<td>Sunshine Canyon Landfill (Los Angeles County)</td>
<td>13.13</td>
<td>67.7</td>
<td>80.83</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,417</strong></td>
<td><strong>1,448</strong></td>
<td></td>
</tr>
</tbody>
</table>


1 The expansion to the Sunshine Canyon Landfill has already been approved.

### Table IV.M.3-4

Permitted Unclassified Landfills

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Azusa Land Reclamation</td>
<td>6,500</td>
<td>439</td>
<td>0.137</td>
<td>43.00</td>
</tr>
<tr>
<td>Brand Park</td>
<td>100</td>
<td>--</td>
<td>--</td>
<td>0.25</td>
</tr>
<tr>
<td>Peck Road Gravel Pit</td>
<td>1,210</td>
<td>1</td>
<td>0.000</td>
<td>7.80</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>7,810</strong></td>
<td><strong>440</strong></td>
<td><strong>0.137</strong></td>
<td><strong>51.05</strong></td>
</tr>
</tbody>
</table>

*Source: County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2008 Annual Report (2009).*

### iii. Transformation (Waste to Energy) Facilities

Two transformation facilities, the Commerce Refuse to Energy Facility in the City of Commerce and the Southeast Resource Recovery Facility in the City of Long Beach, operate within Los Angeles
County. With a combined average daily disposal of 1,883 tons, these two facilities are anticipated to transform 587,000 tons of waste per year through 2022 (the end of the current 15-year planning period).

c. Project Site Solid Waste Generation and Disposal

i. Solid Waste Generation

At indicated in Table IV.M.3-5, Existing Project Site Solid Waste Generation, the active uses on the Project site currently include the approximately 47,014 gross square-foot hospital, approximately 20,969 gross square feet of medical office facilities, approximately 5,893 gross square feet of maintenance and storage space, and two single family dwelling units for hospital staff. As indicated in Table IV.M.3-5, these uses currently generate an estimated 802.32 tons of solid waste annual before waste diversion (e.g., reduction, recycling, reuse, etc.)

<table>
<thead>
<tr>
<th>Existing Uses</th>
<th>Quantity of Active Uses 2</th>
<th>Generation Factor 1</th>
<th>Annual Waste Generation</th>
<th>Waste Diverted</th>
<th>Waste Disposed of in Landfill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hospital &amp; Medical Facilities</td>
<td>47,014 sq. ft.</td>
<td>0.0108 tons/sq.ft./year</td>
<td>507.75 tons</td>
<td>330.00 tons</td>
<td>177.75 tons</td>
</tr>
<tr>
<td>Medical Offices</td>
<td>20,969 sq. ft.</td>
<td>0.0108 tons/sq.ft./year</td>
<td>226.47 tons</td>
<td>147.20 tons</td>
<td>79.27 tons</td>
</tr>
<tr>
<td>Single-Family Residential</td>
<td>2 du</td>
<td>12.23 lbs/household/day</td>
<td>4.46 tons</td>
<td>2.90 tons</td>
<td>1.56 tons</td>
</tr>
<tr>
<td>Maintenance/Storage</td>
<td>5,893 sq. ft.</td>
<td>0.0108 tons/sq.ft./year</td>
<td>63.64 tons</td>
<td>41.37 tons</td>
<td>22.27 tons</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>802.32 tons</td>
<td>521.51 tons</td>
<td>280.81 tons</td>
</tr>
</tbody>
</table>


Notes: du = dwelling units; ksf = thousand square feet.

1 Generation factors are derived from the Ventura County Solid Waste Management Department’s Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts.

2 Quantity of currently active on-site uses provided by Barlow Hospital.

As of June 11, 2009, the City of Los Angeles had a recycling rate of 65 percent. Applying this rate to waste collected from Barlow Hospital, approximately 521.51 tons of solid waste generated at Barlow Hospital is diverted from landfills and approximately 280.81 tons are disposed of in landfills each year.

ii. Solid Waste Collection and Disposal

The following summary of Barlow Hospital’s waste management is based on information provided by Barlow Hospital and the Project civil engineer.

The Project site currently contains one trash compacter and one front-load trash bin located near the on-site generators, away from the main hospital. Waste is transported off-site by Barlow Hospital’s contracted hauler, Athens Services, and taken to City Terrace Transfer Station. Waste from the trash compacter is picked up approximately 18 times per month and waste from the front-load trash bin is collected once per month. Barlow Hospital does not currently have an on-site diversion program, nor does the hospital currently have on-site recycling facilities.

Barlow Hospital does not maintain or operate an autoclave/sanitizer; biohazardous waste generated on-site is collected by Stericycle. Medical waste is stored on the Project site behind the Environmental Services (EVS) storage room, near the ambulance entrance. Medical waste storage is enclosed in non-visible containers and secured at all times.

Waste from the City of Los Angeles that is taken to City Terrace Transfer Station is subsequently taken to either Chiquita or Sunshine Canyon landfills after the recyclables have been removed.

4. ENVIRONMENTAL IMPACT ANALYSIS

a. Methodology

Solid waste generation factors were obtained from the Los Angeles California Environmental Quality Act (CEQA) Thresholds Guide and the California Integrated Waste Management Board website, or a combination thereof. The determination of remaining landfill capacity was based on the 2007 Annual Report for the Countywide Summary Plan and Siting Element of the Los Angeles County Countywide Integrated Waste Management Plan, which was approved in May 2009 and

29 Correspondence with Donna Belich-Kraus, Director of Materials Management and General Services, Hazardous Materials and Waste Management Officer, May 3, 2010.
contains the most recent data on landfills serving the cities and unincorporated areas of Los Angeles County, and data provided by the California Integrated Waste Management Board.

b. Significance Thresholds

Appendix G of the State CEQA Guidelines provides sample checklist questions for use in an Initial Study to determine a project’s potential for environmental impacts. According to the applicable questions31 contained in Appendix G under Section XVII, Utilities and Service Systems, a project should be evaluated for potentially significant impacts based on whether it would:

XVII.f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs; or

XVII.g) Comply with federal, state, and local statutes and regulations related to solid waste.

The City of Los Angeles CEQA Thresholds Guide states that the determination of significance should 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 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 or objectives in the Source Reduction and Recycling Element or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element or Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element.

The factors used in the City of Los Angeles CEQA Thresholds Guide to determine significant solid waste impacts incorporate the more general checklist questions contained in Appendix G of the State CEQA Guidelines. Therefore, based on the more specific thresholds contained in the City of Los Angeles CEQA Thresholds Guide, the proposed Project would have a significant impact if:

31 The remainder of the Appendix G Utilities and Service Systems sample questions (XVI.a through -e) pertain to water supply and wastewater and are addressed in Sections IV.M.1, Water Supply, and IV.M.2, Wastewater. Sample question XVI.c is addressed in Section IV.G, Water Resources: Surface Water Hydrology/Water Quality/ Groundwater.
IV.M.3 Solid Waste

SW-1 The Project does not incorporate design and operational waste diversion features that could reduce typical waste generation rates during demolition, construction and operation of the Project.

SW-2 The Project creates a need for an additional solid waste collection route, or recycling or disposal facility, to adequately handle Project-generated waste.

SW-3 The Project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element 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 Source Reduction and Recycling Element.

c. Project Design Features

The applicant will achieve a minimum of 50 percent waste diversion for construction and demolition debris and a minimum of 65 percent waste diversion (waste (excepting medical and hazardous waste) during operation of the proposed facilities, including the replacement hospital, associated administration and support building, skilled nursing facility, historically significant buildings to be retained in the proposed on-site Historic Zone, and residential and commercial uses, upon implementation of the proposed Project. 32 This would be achieved through a variety of measures. Including but not limited to the following:

- A minimum of 50 percent of the non-hazardous construction waste and demolition debris generated by Project implementation (including construction and demolition debris) will be recycled.

- Construction contractors will only contract for waste disposal services with a company that recycles demolition and construction-related wastes. The contract specifying recycled waste service shall be presented to the Department of Building and Safety prior to issuance of demolition or construction permits.

- Construction and demolition materials will be separated and stockpiled on the Project site for collection and removal during each phase of construction. To facilitate on-site separation and recycling of demolition and construction-related wastes, the construction

---

contractor shall provide temporary waste separation bins on-site during the demolition and construction phases of specific Project components.

- The applicant will recycle a minimum of 65 percent of the waste generated during Project operation (excepting medical and hazardous waste).

- During Project operation, recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers would be provided on-site to reduce the need for solid waste disposal at landfills.

- All grass clippings and lawn area waste will be recycled on- or off-site and will not be introduced into the off-site waste stream, and all lawn area waste shall be recycled on- or off-site.

- A minimum of 50 percent of the vegetative (i.e., green) waste generated during Project operations, except that which is not appropriate to recycle, will be recycled on- or off-site and will not be introduced into the off-site waste stream.

d. Project Impacts

SW-1 Does the Project incorporate design and operational waste diversion features that could reduce typical waste generation rates during demolition, construction and operation of the Project?

i. Construction

The proposed Project would incorporate a number of Project Design Features intended to achieve the construction diversion rates required by applicable regulations, as discussed in Section 4.c, Project Design Features. As summarized therein, with respect to Project construction, a minimum of 50 percent of the non-hazardous construction waste and demolition debris generated by Project implementation (including construction and demolition debris) will be recycled; construction contractors will only contract for waste disposal services with a company that recycles demolition and construction-related wastes, and the contract specifying recycled waste service will be presented to the Department of Building and Safety prior to issuance of demolition or construction permit; and construction and demolition materials will be separated and stockpiled on the Project site for collection and removal during each phase of construction, with temporary waste separation bins to be provided on-site during the demolition and construction phases of specific Project components.
With compliance with the applicable regulations governing construction waste diversion, and with implementation of the proposed Project design features, Project impacts are anticipated to be less than significant.

ii. Operation

The proposed Project would incorporate a number of Project Design Features intended to achieve the operational diversion rates required by applicable regulations, as discussed in Section 4.c, Project Design Features. As summarized therein, with respect to Project operations, the applicant would recycle a minimum of 65 percent of the waste generated during Project operation (excepting medical and hazardous waste) through the provision of recycling containers and adequate storage on-site to promote the recycling of paper, metal, glass, and other recyclable materials; the recycling on- or off-site of all grass clippings and lawn area waste; and the recycling of a minimum of 50 percent of other vegetative (i.e., green) waste generated during Project operations, except that which is not appropriate to recycle.

With compliance with the applicable regulations governing waste diversion, the Project’s operational impacts are anticipated to be less than significant.

SW-2 Would the Project create a need for an additional solid waste collection route, or recycling or disposal facility, to adequately handle project-generated waste?

i. Construction Impacts on Recycling and Disposal Facilities

Construction of the proposed Project is anticipated to occur over an approximately ten-year period. Buildout will consist of existing building demolition, site clearing, earthwork grading and excavation, paving, and building construction. It is estimated that implementation of the proposed Project would result in the grading and excavation of approximately 157,842 cubic yards (205,195 tons) of soil, of which 71,420 cubic yards (92,846 tons) would require export off-site. Additionally, approximately 17,688 cubic yards (12,382 tons) of demolition debris would be generated. This waste is anticipated to include concrete, stucco, asphalt, rocks, building materials,

33 Calculation of tonnage is based on density factor of 2,550 pounds (1.3 tons) of mixed wet and dry earth material per cubic yard. (Source: CalRecycle, “Construction and Demolition Debris Recycling,” http://www.calrecycle.ca.gov/ConDemo/. 2010.)

34 Based on demolition of approximately 130,150 square feet of existing buildings plus approximately two acres of pavement and hardscape.

35 Calculation of tonnage is based on density factor of 1,400 pounds (0.7 tons) of mixed asphalt, concrete and wood construction debris per cubic yard. (Source: CalRecycle, “Construction and Demolition Debris Recycling,” http://www.calrecycle.ca.gov/ConDemo/. 2010.)
wood, paper, glass, plastic, metals, cardboard, and other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern).\textsuperscript{36}

In addition to demolition debris, construction of the proposed Project would generate approximately 3,398 tons of construction waste consisting of scrap wood, drywall, metal, concrete/asphalt, and other excess usable building material generated during construction. Anticipated construction waste is summarized in Table IV.M.3-6, Project Construction Waste Generation. Unlike demolition debris, as much as 80 percent of waste generated during construction is reusable or recyclable, since it is relatively clean and therefore marketable.\textsuperscript{37} In compliance with applicable regulations and as discussed in Section 4.c, Project Design Features, a minimum of 50 percent of the debris generated during the demolition and construction processes would be separated and recycled on- or off-site.

<table>
<thead>
<tr>
<th>Material</th>
<th>Generation Factor (tons/ksf)</th>
<th>Square Feet to be Constructed (ksf)</th>
<th>Construction Debris Generated (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wood</td>
<td>0.86</td>
<td>1,204.82</td>
<td>1,036</td>
</tr>
<tr>
<td>Drywall</td>
<td>0.22</td>
<td>1,204.82</td>
<td>265</td>
</tr>
<tr>
<td>Metal</td>
<td>0.21</td>
<td>1,204.82</td>
<td>253</td>
</tr>
<tr>
<td>Concrete/Asphalt</td>
<td>0.99</td>
<td>1,204.82</td>
<td>1,193</td>
</tr>
<tr>
<td>Other</td>
<td>0.54</td>
<td>1,204.82</td>
<td>651</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>3,398</strong></td>
</tr>
</tbody>
</table>


*Notes: ksf = thousand square feet*

Altogether, construction activities (demolition plus construction) would result in the total generation of 15,780 tons of solid waste, assuming no reuse or recycling of construction waste.

\textsuperscript{36} Leachates are liquid substances that have percolated through solid waste or are generated by solid waste decomposition and contain dissolved or suspended materials and can contaminate ground or surface water. (Source: The School Diversion and Environmental Education Law, “School DEEL Resource Manual,” November 2005.)

**IV.M.3 Solid Waste**

Exported soil and demolition debris would be hauled to one or more of the several Unclassified landfills serving Los Angeles County (unlike Class III landfills, Unclassified landfills are designated for the exclusive disposal of inert debris such as soil and construction materials). Earth material disposed at Unclassified landfills could be used for “alternative daily cover” operations and may not count towards the maximum refuse permitted at the landfill. Alternative daily cover consists of shredded green waste and soil used to meet part of each landfill’s daily cover requirements and as mulch for weed and erosion control.38

As of December 31, 2009, the remaining permitted Unclassified landfill capacity in the County was estimated at 142 million tons.39 The exported soil, demolition debris, and construction debris generated by the proposed Project would represent approximately .002 percent of the County’s remaining capacity if no recycling and diversion is implemented. Based on the existing average rate of disposal of solid waste at County landfills, and current plans for landfill expansions and new landfills, the CoIWMP estimates that County landfills have or will have adequate capacity for the next approximately 339 years.40

Accordingly, the County has adequate permitted waste disposal capacity for the foreseeable future, and the anticipated volume of Project-related construction debris would have a less than significant impact on that capacity.41

**ii. Operational Impacts on Recycling and Disposal Facilities**

As shown in Table IV.M.3-7, *Project Operations Solid Waste Generation*, the proposed Project would generate approximately 3,492.41 tons of solid waste per year, or a net increase of approximately 2,690.09 tons of solid waste per year over existing conditions. As of June 2009, the City of Los Angeles had a recycling rate of 65 percent.42 Applying this rate to the waste generation

---

39 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2009 Annual Report, Appendix E-2, Table 1.
Table IV.M.3-7  
Project Operations Solid Waste Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Quantity</th>
<th>Generation Factor</th>
<th>Annual Waste Generation</th>
<th>Waste Diverted</th>
<th>Waste Disposed of in Landfill</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hospital, Nursing Facility, Administration &amp; Support¹</td>
<td>139,220 sf</td>
<td>0.0108 tons/sq.ft./year</td>
<td>1,503.58 tons</td>
<td>977.32 tons</td>
<td>526.25 tons</td>
</tr>
<tr>
<td>Residential²</td>
<td>888 du</td>
<td>12.23 lb/dwelling unit/day</td>
<td>1,981.99 tons</td>
<td>1,288.30 tons</td>
<td>693.70 tons</td>
</tr>
<tr>
<td>Commercial³</td>
<td>15,000 sf</td>
<td>2.5 lb/1000 sq.ft./day</td>
<td>6.84 tons</td>
<td>4.45 tons</td>
<td>2.40 tons</td>
</tr>
<tr>
<td>Gross Total</td>
<td></td>
<td></td>
<td>3,492.41 tons</td>
<td>2,270.07 tons</td>
<td>1,222.34 tons</td>
</tr>
<tr>
<td>Existing¹</td>
<td></td>
<td></td>
<td>802.32 tons</td>
<td>521.51 tons</td>
<td>280.81 tons</td>
</tr>
<tr>
<td>Net Total</td>
<td></td>
<td></td>
<td>2,690.09 tons</td>
<td>1,748.56 tons</td>
<td>941.53 tons</td>
</tr>
</tbody>
</table>


¹ Generation factors are derived from the Ventura County Solid Waste Management Department's Guidelines for Preparation of Environmental Assessments for Solid Waste Impacts
² City of Los Angeles, Department of City Planning. 2006. City of Los Angeles CEQA Thresholds Guide.
⁴ Includes 65% diversion.

Projections for the proposed Project, approximately 1,749 tons of the net total solid waste from the proposed Project would be recycled and approximately 942 tons would be disposed of in a landfill.

The Sunshine Canyon Landfill is the primary landfill serving the Project site; however, disposal at additional landfills may be facilitated through contractual agreements between a private waste hauler (for the hospital and commercial uses) and the operators of other landfills. The net annual increase of approximately 942 tons resulting from operation of the proposed Project represents approximately 0.04 percent of the 2009 disposal rate of approximately 2.178 million tons to the Sunshine Canyon Landfill. Therefore, the increase in disposal at the Sunshine Canyon Landfill as a result of the proposed Project would not be substantial.
In June 2008, the California Integrated Waste Management Board issued a permit to increase the capacity of the Sunshine Canyon Landfill by 67.7 million tons. This expansion is expected to increase the landfill's lifespan by 30 years and further enhance the ability of the Sunshine Canyon Landfill to accommodate waste generated by the Project following buildout, in addition to the existing solid waste stream.

The CoIWMP 2009 Annual Report determined that based on the continuation of business as usual practices, solid waste disposal capacity in Los Angeles landfills would begin to experience a shortfall in 2014. However, this estimate does not account for a number of recently approved and proposed landfill expansions that would significantly expand landfill capacity, which could be made available to the City of Los Angeles, and the proposed Project, in the future. Other expansions not taken in consideration are the in-County landfill expansions currently being pursued at the Antelope Valley Landfill (adding 8.96 million tons) and the Chiquita Canyon Landfill (adding 32 million tons), or the development of out-of-County landfills such as the Eagle Mountain Landfill in Riverside County and the Mesquite Regional Landfill in Imperial County; the operation of the latter two landfills would provide enough additional capacity to accommodate Los Angeles County’s disposal need during the latter part of the present 15-year planning period (2009-2024).

For these reasons, and with compliance with the proposed Project Design Features, the proposed Project would result in a less than significant impact with respect to solid waste disposal capacity at buildout in 2022.

### iii. Project Impacts on Solid Waste Collections System

The Project site is required to be accessible to waste collection vehicles operated by the Bureau of Sanitation. As stated in Section IV.K.2, Fire Protection and Emergency Medical Services, of this Draft EIR, all on-site access roads would comply with the Los Angeles Fire Department’s road accessibility codes, and therefore would be accessible for waste collection. The Project is not anticipated to result in the need for a new waste collection route since the existing hospital is already served by the City’s Bureau of Sanitation. However, the proposed Project would replace the existing hospital with a larger hospital and would add a skilled nursing facility, commercial uses, and 888 residential units, in addition to retaining 11 existing on-site buildings. The full Project is

---

44 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2009 Annual Report, 34.
not yet integrated into the Bureau of Sanitation's solid waste collection system and would necessitate an expansion of existing waste collection routes. This is considered a potentially significant impact.

SW-3 Would the Project conflict with solid waste policies and objectives in the Source Reduction and Recycling Element 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 Source Reduction and Recycling Element?

The applicant is required comply with the waste reduction goals set forth by the Source Reduction and Recycling Element, City of Los Angeles Solid Waste Management Policy Plan, RENEW LA, and Framework Element, which are discussed above. The applicant is also required to implement waste diversion efforts to comply with the diversion goals of the County's Source Reduction and Recycling Element, which is to achieve the state's mandates of 50, 60, and 75 percent waste disposal reductions for the years 2000, 2015, and 2020, respectively, and the City of Los Angeles Solid Waste Management Policy Plan, which has goals of 70 percent diversion by 2020.

The Project is also required to comply with City's Municipal Code requirements, including the Space Allocation Ordinance in response to AB 1327, which requires space on project sites for storage and collection of recyclables; the Construction and Demolition Waste Recycling Ordinance.

The Project would partially comply with Section 99.04.408.1 of the City's Green Building Code's, which required 100 percent of trees, stumps, rocks, and associated vegetation and soils (except contaminated soils) resulting primarily from land clearing during construction to be stockpiled on the Project site for reuse or collection and hauling for recycling. Proposed building siting and grading were designed to minimize the need for grading and soil export, but export of soil and rock will likely be required owing to the topography of the site and anticipated earthwork volumes resulting from grading and excavation (e.g., for subterranean parking, building pads, etc.). These materials would be disposed of at inert landfills, which have adequate capacity.

Since the Project would comply with the majority of applicable policies, impacts related to compliance, and since adequate capacity exists in County landfills to accommodate the proposed Project, this is considered less than significant.
e. Mitigation Measures

MM-SW-1 At least two months prior to occupation of the hospital and any residential or commercial buildings, notice of Project occupancy shall be provided to the Bureau of Sanitation. During this time, the Project shall be incorporated into the Bureau of Sanitation’s Geographical Information System (GIS) collection routing system.

f. Level of Significance After Mitigation

After implementation of mitigation measure MM-SW-1, Project impacts on the City of Los Angeles Bureau of Sanitation’s existing solid waste collection system would be less than significant. Through compliance with applicable policies, Project impacts related to the generation and disposal of construction and demolition debris and waste generated during Project operations would be less than significant.

g. Cumulative Impacts

Per the 2009 Los Angeles County Countywide Integrated Waste Management Plan Annual Report, there are two permitted inert landfills in Los Angeles County that accept solid waste, the Peck Road Gravel Pit and Azusa Land Reclamation Facility with a combined capacity is 56 million tons. Since the average inert waste disposal rate in 2009 was approximately 440 tons per day, the capacity of the two landfills would not be exhausted for 339 years, and is therefore considered adequate for future inert waste disposal needs. Cumulative impacts related to inert landfill capacity would be less than significant.46

With respect to Class III landfill capacity, the 2009 CoIWMP Annual Report evaluates several scenarios to determine in-County landfill capacity at the end of the 15-year planning period in 2024. The report states that as of the end of 2024, assuming the status quo (i.e., no change in currently permitted landfill capacity and a diversion rate of 55 percent percent), the demand for Class III solid waste disposal will total 165 million tons, whereas capacity at in-county Class III landfills would be approximately 142 million tons, resulting in a capacity shortfall.

However, this projection does not take into account several factors that could reduce waste generation at the source or increase capacity at Class III landfills. The 2009 CoIWMP Annual Report evaluates several scenarios affecting future landfill capacity, including the implementation of currently proposed expansions of in-County Class III landfills, the development of new landfills in-

County, differing amounts of waste imported and exported into/out of the County, the use of alternative waste disposal technologies, and increased waste diversion as mandated by local and state regulations. A disposal capacity shortfall is anticipated beginning in 2014 under the status quo scenario; assuming existing County landfill expansions are implemented and no imports/exports out of County takes place; assuming currently planned County landfill expansions are implemented and a cap is placed on out-of-County import/export; assuming the development of alternative disposal technologies together with increased diversion; and assuming expansion of in-County Class II landfills plus increased imports/exports.

Under two of these scenarios – assuming the status quo, or assuming only the implementation of current planned in-County landfill expansions – a disposal capacity shortfall would be realized beginning in 2014. However, the CoIWMP 2008 Annual Report states that the County is expected to be able to avoid a disposal capacity shortfall during the 15-year planning period (i.e., through 2024) through expansion of existing in-County Class III landfills, conversion technologies, expansion of transfer and processing infrastructure, and increasing waste diversion.

The Annual Report acknowledges there is a need to develop solid waste management alternatives to accommodate future growth beyond 2024. The County will continually address landfill capacity through the preparation of CoIWMP annual reports, and the associated 15-year lead time for preparation of each IWMP allows the County to address potential future shortfalls in landfill capacity. Moreover, it is anticipated that the rate of declining landfill capacity will slow as the City achieves its goal of 75 percent diversion by 2013.

As shown in Table IV.M.3-8, Solid Waste Generation – Related Projects, implementation of the proposed Project and related projects would increase the quantity of solid waste requiring disposal at landfills serving Los Angeles County. Assuming an operational waste diversion rate of 65 percent for related projects, operation of the proposed Project and related projects would require the net disposal of approximately 11,806 tons of solid waste annually in landfills; the proposed Project would account for just under 0.08 percent of this amount. Given this minor incremental increase in cumulative annual waste generation and the fact that Class II landfill capacity is expected to be adequate through at least 2024, which is beyond the Project buildout horizon, the Project would have a less than considerable contribution to cumulatively significant landfill capacity impacts.
### Table IV.M.3-8
Solid Waste Generation – Related Projects

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Quantity</th>
<th>Generation Factor</th>
<th>Annual Waste Generation (tons)</th>
<th>Waste Disposed in Landfill$^3$ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>582,762 sf</td>
<td>2.5 lb/1000 sq.ft./day</td>
<td>265.89</td>
<td>119.65</td>
</tr>
<tr>
<td>Restaurant</td>
<td>160,390 sf</td>
<td>0.005 lb/sq.ft./day</td>
<td>146.36</td>
<td>65.86</td>
</tr>
<tr>
<td>Office</td>
<td>821,665 sf</td>
<td>6 lbs/ksf/day</td>
<td>899.72</td>
<td>404.87</td>
</tr>
<tr>
<td>Schools</td>
<td>284,834 sf</td>
<td>0.007 lb/sq.ft./day</td>
<td>363.88</td>
<td>163.74</td>
</tr>
<tr>
<td>Schools</td>
<td>1,375 stu</td>
<td>1 lb/student/day</td>
<td>250.94</td>
<td>112.92</td>
</tr>
<tr>
<td>Residential</td>
<td>9,400 sf</td>
<td>12.23 lb/dwelling unit/day</td>
<td>20,980.57</td>
<td>9,441.25</td>
</tr>
<tr>
<td>Health Club/Spa</td>
<td>108,200 sf</td>
<td>3.12 lb/100 sq.ft./day</td>
<td>616.09</td>
<td>277.24</td>
</tr>
<tr>
<td>Hotel/Motel</td>
<td>397 rm</td>
<td>2 lbs/rm/day</td>
<td>144.91</td>
<td>65.21</td>
</tr>
<tr>
<td>Storage</td>
<td>66,000 sf</td>
<td>5 lb/1000 sq.ft./day</td>
<td>60.23</td>
<td>27.10</td>
</tr>
<tr>
<td>Metro Bus Maintenance &amp; Operations Project$^2$</td>
<td>647 employees</td>
<td>0.6 tons/employee/year</td>
<td></td>
<td>388.20</td>
</tr>
</tbody>
</table>

**Gross Subtotal**

<table>
<thead>
<tr>
<th>To Be Removed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Museum/Cultural Space</td>
</tr>
<tr>
<td>Warehouse</td>
</tr>
</tbody>
</table>

**Net Subtotal**

<table>
<thead>
<tr>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Project</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

---

**Source:** CalRecycle, “Estimated Solid Waste Generation Rates,”

1 Excludes a correctional facility, gas station and associated convenience store, student exam facility and conference facility, museum seating area, and correctional facility due to lack of generation factors.

2 Factor is the Retail Trade–Automotive Dealers & Service Station disposal rate. This rate does not include the diversion rate, and therefore is disposal to landfills only.

3 Assumes a 65 percent diversion rate.

Notes: du = dwelling units; sf = square feet; rm = room; stu = student