IV. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC UTILITIES: SOLID WASTE

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Solid waste generated at the project vicinity is generally disposed of at the Sunshine Canyon Landfill located off San Fernando Road in the Sylmar area of the San Fernando Valley near the Interstate 210, 5 and Highway 14 interchange. The landfill is owned by Brown-Farris Industries (BFI) which operates the facility under permits for both the City of Los Angeles portion and a County of Los Angeles portion. The City side of Sunshine Canyon Landfill is permitted to accept approximately 5,500 tons of waste per day and 30,000 tons per week¹. The County portion of the landfill provides additional disposal capacity of approximately 6,600 tons per day with 11.2 million tons of remaining capacity². The City/County Landfill will provide 30 years of disposal capacity at an average rate of 11,000 tons per day³. Although solid waste generated at the project site is expected to go to Sunshine Canyon Landfill, *Table 36: Existing Landfill Facilities in Los Angeles County* identifies the landfill facilities that would have the capacity to serve the project site and project area if capacity was not available at Sunshine Canyon Landfill. This table identifies the permitted daily quantities, number of operating days per week, expiration dates of current permits, and the average collection quantities of potential landfills for the project area.

b. Regulatory and Policy Setting

The Los Angeles Countywide Integrated Waste Management Plan identifies goals for solid waste that encourage the continued development of an integrated solid waste management system to assist jurisdictions in maximizing waste reduction, eliminate barriers and promote intergovernmental cooperation among jurisdictions to create new opportunities for diversion programs, encourage stronger long-term markets for material diversion⁴. In an effort to remain proactive in planning for solid waste alternatives, the City of Los Angeles prepared a Background Studies Summary Report. This Report is the preliminary step in a multi-phase effort to consolidate multiple planning and implementation document and establish a current baseline of system operating conditions to facilitate future planning efforts⁵ Goals identified in this Report include maximum waste diversion, adequate collection and disposal of mixed solid waste, and adequate recycling programs.

¹ California Integrated Waste Management Board (CIWMB). 2003 (May 21). Solid Waste Facility Permit (SWFP) for the Sunshine Canyon Landfill. 12 June 2008 http://sunshinecanyonlandfill.com/regulatory/pdf/SWFP (Issued 5-21-03).pdf >.

² Sunshine Canyon Landfill. 2007. Sunshine Canyon Landfill Website. 22 May 2008 http://www.sunshinecanyonlandfill.com/index.htm.

³ Sunshine Canyon Landfill. 2007. Sunshine Canyon Landfill Website. 22 May 2008 http://www.sunshinecanyonlandfill.com/index.htm.

⁴ Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division. 1997 (June). Los Angeles County Integrated Waste Management Plan. Los Angeles, CA: the County. 12 June 2008 http://ladpw.org/epd/tf/about.cfm>.

⁵ Los Angeles Department of Public Works, Bureau of Sanitation. 2006 (January). City of Los Angeles Solid Waste Planning Background Studies Summary Report. 12 June 2008 http://www.lacity.org/san/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf.

EXISTING LANDELL FACILITIES IN LOS ANGELES COUNTY [1] TABLE 36

			AVERAGE DAILY			
FACILITY	LOCATION	PERMITTED DAILY DISPOSAL (TONS) [2]	WASTE RECEIVED IN 2000 (TONS)	USAGE RESTRICTIONS	REMAINING CAPACITY	STATUS [3]
Antelope Valley Landfill	Antelope Valley	1	025	None	7,800,000 tons	CUP issued 4/18/1992
Bradley West Landfill	Sunland	01	019'L	None	3,100,000 tons	Amended 12/31/1993
Calabasas Landfill	Agora	3	1,100	Wasteshed [4]	11,700,000 tons	CUP expires 3/18/2006 Expected to close before 2006
Chiquita Canyon Landfill	Valencia	\$	4,420	None	20,100,000 tons	CUP expires upon reaching permitted capacity.
Commerce RTE	Commerce	1	098	None	n/a	n/a
Lancaster Landfill	Lancaster	1	450	None	12,700,000 tons	n/a
Puente Hills Landfill	Whittier	13	13,200	No refuse from cities greater than 2,500,000 [5]	41,184,000 tons [6]	CUP expires 08/01/2012
Scholl Canyon Landfill	Glendale	3	1,410	Wasteshed [4][5]	8,900,000	CUP expires 11/2013
Southeast Resource Recovery	Long Beach	2	1,360	None	n/a	CUP expires upon reaching permitted capacity.
Spadra Landfill	Walnut	2	540	None	closed 2000	n/a
[11] Course, Duck Emilionmental Line and Donout 4000 Woulder Mill Board Country of	I True got D on out 4000 W		Danaged of Daniel Di	Sairing Contambar 2000	1 Courses. "Countinued On one	To American Demonstrate of Description District Land Office of Control of C

Source: Draft Environmental Impact Report 4000 Workman Mill Road. County of Los Angeles Department of Regional Planning. September 2002. Original Source: "Continued Operation of the Puente Hills Landfill," Environmental Impact Report, Sanitation Districts of Los Angeles County, January 2002.
 Based on a six-day work week.
 Available capacity at end of 2000.
 Wasteshed includes jurisdictions in proximity to the site that have historically used the site.
 Massished includes jurisdictions in proximity to the site from any county, besides Los Angeles County, having a population greater than 2,000,000. However, currently Scholl Canyon Landfill only accepts waste from its own wasteshed which primarily includes the City of Glendale.

[6] Based on 13,200 tons per day, 6 days a week, 52 weeks per year until the CUP expires in 2013. Per phone conversation between Monique Salezar, Los Angeles County Sanitation Districts, and Carrie Riordan, Planning Associates, Inc., March 3, 2004

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006). The determination of significance shall be made on a case-by-case basis, considering the following factors:

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

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project includes the addition of approximately 280,000 GLSF of new retail and restaurant uses at the existing shopping center that would generate additional waste at the project site. Solid waste programs and disposal procedures would continue to operate as they do with the existing shopping center. To implement the Proposed Project, an existing three-level parking structure and some surface parking area would be demolished and new construction of a two-level retail building and two multi-level parking structures is proposed.

The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also would establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the Applicant would ensure that the specified

recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the Applicant would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer would ensure that the specified recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.
- The Proposed Project would designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. The Fashion Square Mall Association would consider employing cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.
- The Proposed Project will implement a recycling program, which include recycling of more the 90% of corrugated cardboard waste, which is the single largest component of the shopping centers waste. The Proposed Project will also implement a program to separates water from organic waste in the food preparation process through "pulper" equipment. This reduces fuel cost in transporting the waste.
- In addition, and consistent with PDFs described in Section IV: Environmental Impact Analysis: B-Air Quality of this EIR, the Proposed Project is designed and will be

built and operated in a manner consistent with the requirements to achieve LEED⁶ certification. Although specific measures that would be employed are listed above, the application of other LEED certifiable measures would incrementally result in further reduction of solid waste and the long-term impact to local landfills. The Proposed Project will implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certification.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

• The Propose Project would comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream reduction requirements as provided in the plan.

b. Project Impacts

The Proposed Project is anticipated to generate solid waste during both construction and operational activities at the project site. Construction waste would be short-term and represents a one-time generation of waste while operation waste will be long-term and ongoing for the life of the shopping center. Both scenarios are discussed below.

(1) Construction Waste

Construction waste includes waste from both the demolition and construction processes. Demolition of the existing "south" three-level parking structure that feeds the shopping center and construction of the proposed retail/restaurant expansion and two new parking structures will generate construction waste. Demolition of the existing parking structure, at approximately 120,000 square feet, would produce a one-time occurrence of approximately 9,300 tons of waste⁷. Construction of the proposed 280,000 GLSF expansion of the shopping center is anticipated to generate approximately 319 tons of waste⁸, also a one-time occurrence. Excavation for the subterranean parking level will generate approximately 147,016 cubic yards of earth material to be removed from the project site. These soils are anticipated to be transported as fill to some other location and would not be disposed as landfill.

During construction activities, a considerable portion of both demolition and construction materials while be recycled and used either in on-site construction and/or hauled off-site for recycling, therefore reducing waste materials being transported to landfills serving the project area. In an effort to minimize the amount of construction waste being taken to landfills, the

⁶ LEED is the Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council. LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. Source: United States Green Building Council, *Leadership in Energy and Environmental Design*, www.usgbc.org/LEED, 2007.

⁷ Assumes 155 pounds of demolition waste per square foot. City of Antioch, California website.

http://ci.antioch.ca.us/Environment/cdro/antiochinfoconversions.pdf

⁸ Assumes 1.14 tons per 1,000 square feet of construction waste. City of Santa Monica Building Program website. http://greenbuildings.santa-monica.org/appendices/apawastegeneration.html

Project Applicant would require primary construction contractors to provide separate receptacles for materials that can be recycled such as wood scraps, metal scraps, and cardboard. Individual contractors would be required to emphasize diversion planning rather than demolition, to ensure that the maximum amount of recyclable materials are separated and placed in the appropriate bins. Given the amount of remaining landfill capacity and the recycling measures to be used during construction of the Proposed Project, demolition and construction activities associated with the project are anticipated to result in a less than significant solid waste impact.

(2) Operational Waste

The site is currently developed with approximately 867,000 GLSF, including approximately 842,045 GLSF of retail space and approximately 24,955 GLSF utilized by the food court area. The existing shopping center development generates approximately 2,818 pounds per day of solid waste.

The Proposed Project would result in approximately 1,147,000 GLSF total including approximately 1,075,223 GLSF of retail, approximately 28,000 GLSF of sit-down restaurants, and approximately 43,777 GLSF of the Gourmet Dining Terrace. The total development, including implementation of the Proposed Project, is anticipated to result in approximately 4,739 pounds of solid waste per day, an increase of approximately 1,921 pounds per day of solid waste.

The City of Los Angeles CEQA Thresholds of Significance indicate that a determination of significance should give consideration to the amount of projected waste generation, the need for additional solid waste collection routes, and whether the project conflicts with identified solid waste policies. The Proposed Project includes expansion of an existing shopping center that is currently adequately served with waste disposal services. There are existing service routes to and from the project site, and within the surrounding, fully-developed community. The Proposed Project would result in a less than significant solid waste impact due to the need for additional solid waste collection routes.

The Proposed Project will comply with all applicable federal, state, and local laws and regulations related to solid waste generation, collection and disposal. The Proposed Project will result in a less than significant solid waste impact since it will achieve compliance with solid waste regulations or conflicts with applicable solid waste plans and regulations.

The Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.

(3) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address solid waste, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

⁹ Assumes generation rate of 2.5 pounds per 1,000 gross leaseable square feet of retail space, and 1.0 pounds per seat of food court and sit-down restaurant uses. Assumes a worst-case scenario of 35 square feet per restaurant seat.

(4) Cumulative Impacts

The identified related projects (see Section III: General Description of the Environmental Setting: B-Related Projects, of this EIR) could result in a solid waste generation of approximately 4,900 pounds per day, or 2.46 tons. With the Proposed Project's estimated increase in solid waste, the total cumulative increase in solid waste from the project area is approximately 6,800 pounds per day or 3.4 tons. The Sunshine Canyon Landfill, which would accept waste from this area of the City of Los Angeles, is permitted to accept approximately 5,500 tons of waste per day and 30,000 tons per week. City of Los Angeles CEQA Significance Thresholds indicate that a determination of significance should give consideration to the amount of projected waste generation, the need for additional solid waste collection routes, and whether the project(s) conflicts with identified solid waste polices. The related project area is currently served with waste disposal services. There are existing service routes to and from the fully-developed area.

All related projects would be required to comply will all applicable federal, state and local laws and regulations related to solid waste generation, collection, and disposal, including the Los Angeles Countywide Integrated Waste Management Plan which identifies goals for incrementally reducing the regional waste stream over a the long-term. As such, the related projects will result in a less than significant impact due to conflicts with applicable solid waste plans and regulations.

Related projects would result in a less than significant solid waste impact due to the need for additional solid waste services, and the Proposed Project would not contribute substantially to a cumulative impact to solid waste.

4. MITIGATION PROGRAM

MM PU-1: The Proposed Project shall comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream reduction requirements as provided in the plan.

MM PU-2: The Proposed Project shall develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) shall be recycled and/or salvaged. Excavated/exported soil shall be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) shall be processed as greenwaste. The CWMP include measures for the recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP shall designate a specific area(s) on the

¹⁰ Assumes generation rate of 2.5 pounds per 1,000 square feet of retail space, and 1.0 pounds per seat of food court and sit-down restaurant uses. Assumes a worst-case scenario of 35 square feet per restaurant seat.

¹¹ California Integrated Waste Management Board (CIWMB). 2003 (May 21). Solid Waste Facility Permit (SWFP) for the Sunshine Canyon Landfill. 12 June 2008 http://sunshinecanyonlandfill.com/regulatory/pdf/SWFP (Issued 5-21-03).pdf >.

construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. The CWMP shall identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP shall also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified recycled content materials would be installed. The CWMP shall also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

- MM PU-3: The Proposed Project shall designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. As feasible, the Fashion Square Mall Association shall employ cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.
- MM PU-4: The Proposed Project shall be designed, built and operated in a manner consistent with the requirements to achieve LEED certification. The Proposed Project will implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certification.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

With compliance of applicable standard conditions and implementation of the project design features (including attaining LEED certification), which have been incorporated into the Mitigation Program above, the Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.