This section has been revised in response to comments received on the Draft EIS/EIR (April 2009), and based on additional independent review by the lead agencies (U.S. Army Corps of Engineers and California Department of Fish and Game). The revised or additional text is shown in double-underline; deleted text is shown in ~~strikeout~~. Revised or new figures or tables (if applicable) are indicated by the addition of the following text to the figure or table title: **(Revised)** or **(New)**.

4.20.1 INTRODUCTION

This section describes the existing solid waste and hazardous waste management services provided in the Project region, and evaluates whether significant impacts to those services would result from the proposed Project and alternatives. This section specifically considers whether the existing services, including landfill(s) currently serving the Project area, have sufficient capacity to accommodate the anticipated demand of the proposed Project and alternatives, in addition to serving other areas in the Project region. This section also evaluates whether the proposed Project and alternatives would comply with federal, state, and local statutes and regulations related to solid waste and hazardous waste materials. Please also refer to this EIS/EIR, **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, for additional information concerning hazardous waste materials.

4.20.1.1 Relationship of Proposed Project to Newhall Ranch Specific Plan Program EIR

This section (**Section 4.20**) provides a stand-alone assessment of impacts related to the significant solid waste services and hazardous waste management associated with the proposed Project and alternatives; however, the previously certified Newhall Ranch environmental documentation provides important information and analysis pertinent to the analysis in this EIS/EIR. Implementation of the proposed Project components (*i.e.*, the RMDP and SCP) would require federal and state permitting, consultation, and agreements that are needed to facilitate development of the approved land uses within the Specific Plan area. Further, if approved, the proposed Project would establish spineflower preserves within the Project area, also facilitating development within the approved Specific Plan area, the VCC planning area, and portions of the Entrada planning area. Due to this relationship, the Newhall Ranch environmental documentation, findings, and mitigation are summarized below to provide context for the proposed Project and alternatives.

Section 4.15, Solid Waste, of the Newhall Ranch Revised Draft EIR (March 1999) identified and analyzed the existing solid waste services, potential impacts, and mitigation measures for the entire Specific Plan area. In addition, Section 5.0 of the Newhall Ranch Revised Draft EIR (March 1999) identified and analyzed the solid waste services-related impacts and mitigation measures associated with construction and operation of the approved WRP. The Newhall Ranch Revised Draft EIR (March 1999) concluded that implementation of the Specific Plan would result in significant impacts to solid waste services that could not be reduced to less than significant.

In order to address the significant impacts to solid waste and hazardous waste management services, the Newhall Ranch Specific Plan Program EIR recommended implementation of Mitigation Measures SP-

4.15-1 through SP-4.15-4.[1] In addition, to reduce the solid waste services-related impacts resulting from construction and operation of the approved WRP, the Newhall Ranch Specific Plan Program EIR recommended implementation of Mitigation Measure SP-5.0-59. Adoption and implementation of these measures would meet applicable solid waste diversion, storage, and disposal standards identified within the Specific Plan and reduce impacts to solid waste services in the Project region. However, despite the reduction of solid waste generation during both project construction and operation achieved *via* adoption and implementation of the recommended mitigation measures, the Los Angeles County Board of Supervisors found that until the County can demonstrate that approved landfill space or other disposal alternatives will adequately serve existing and future users, project and cumulative solid waste services-related impacts would remain significant and unavoidable.

Table 4.20-1 summarizes the Specific Plan and WRP impacts on solid waste services, the applicable mitigation measures, and the significance findings after implementation of mitigation.

Table 4.20-1
Impacts to Solid Waste Services Caused By Implementation of the Specific Plan and WRP

Impact Description	Mitigation Measures	Finding After Mitigation
Specific Plan Solid Waste Disposal Impacts - Because an adequate supply of landfill space had not been approved for beyond 1997, and because existing hazardous waste management facilities in the County were inadequate, the increase in solid and hazardous waste generation that would result from approval of the Specific Plan would result in a significant impact.	• **SP-4.15-1** Each future subdivision which allows construction within the Newhall Ranch Specific Plan shall meet the requirements of all applicable solid waste diversion, storage, and disposal regulations that are in effect at the time of subdivision review. Current applicable regulations include recycling areas that are: • compatible with nearby structures; • secured and protected against adverse environmental conditions; • clearly marked and adequate in capacity, number, and distribution; • in conformance with local building code requirements for garbage collection access and clearance; • designed, placed, and maintained to protect adjacent developments and transportation corridors from adverse impacts, such as noise, odors, vectors, or glare; • in compliance with federal, state, or local laws relating to fire, building, access, transportation, circulation, or safety; and • convenient for persons who deposit,	Significant and unavoidable impact

[1] References to mitigation measures included in the Newhall Ranch Specific Plan Program EIR are preceded by "SP" in this EIS/EIR to distinguish them from other mitigation measures discussed herein.

Table 4.20-1
Impacts to Solid Waste Services Caused By Implementation of the Specific Plan and WRP

Impact Description	Mitigation Measures	Finding After Mitigation
	collect, and load the materials. • **SP-4.15-2** Future multi-family, commercial, and industrial projects within the Specific Plan shall provide accessible and convenient areas for collecting and loading recyclable materials. These areas are to be clearly marked and adequate in capacity, number, and distribution to serve the development. • **SP-4.15-3** The first purchaser of each residential unit within the Specific Plan shall be given educational or instructional materials which will describe what constitutes recyclable and hazardous materials, how to separate recyclable and hazardous materials, how to avoid the use of hazardous materials, and what procedures exist to collect such materials. • **SP-4.15-4** The applicant of all subdivision maps which allow construction within the Specific Plan shall comply with all applicable future state and Los Angeles County regulations and procedures for the use, collection, and disposal of solid and hazardous wastes.	
Specific Plan Cumulative Solid Waste Services Impacts - Build-out of all lands under the current land use designations indicated in the Los Angeles County Santa Clarita Valley Area Plan and the city of Santa Clarita General Plan, plus the Newhall Ranch total solid waste generation, would generate approximately 631,334 tons of solid waste per year. Newhall Ranch Specific Plan's share of 53,524 tons per year would represent 8.5 percent of this total. Without the approval of additional landfill space or other disposal alternatives, the continued generation of solid and hazardous waste would cause a significant cumulative impact.	• No additional mitigation recommended.	Significant and unavoidable impact.

Table 4.20-1
Impacts to Solid Waste Services Caused By Implementation of the Specific Plan and WRP

Impact Description	Mitigation Measures	Finding After Mitigation
WRP Solid Waste Disposal Impacts - Landfill disposal of the biosolids produced as a by-product of the water reclamation process would contribute to an unavoidable significant impact on landfill facilities, because such facilities are limited in number, have finite capacity, and new facilities are expensive and difficult to develop.	• **SP-5.0-59** The operators of the WRP shall ensure that all solid waste diversion, storage, and disposal requirements that are in effect at the time the WRP is constructed, including AB 939 and all others, will be implemented so that the waste generated by the WRP will not impede the County's waste reduction and diversion requirements during construction and operation.	Significant and unavoidable impact

Source: Newhall Ranch Revised Draft EIR (March 1999) and Newhall Ranch Revised Additional Analysis (May 2003).

4.20.1.2 Relationship of Proposed Project to VCC and Entrada Planning Areas

4.20.1.2.1 VCC Planning Area

The SCP component of the proposed Project, if approved, would facilitate development in the VCC planning area. The VCC is reliant on the SCP and associated take authorizations, and would not be developed without the take authorizations due to grading constraints. The VCC planning area is the remaining undeveloped portion of the VCC commercial/ industrial complex currently under development by the applicant. The VCC was the subject of an EIR certified by the County of Los Angeles in April 1990 (SCH No. 1987-123005). The applicant has recently submitted to Los Angeles County the last tentative parcel map (TPM No. 18108) needed to complete build-out of the remaining undeveloped portion of the VCC planning area. The County will require preparation of an EIR in conjunction with the parcel map and related project approvals; however, the County has not yet issued a Notice of Preparation (NOP) of the EIR or released the EIR. **Table 4.20-2** summarizes the VCC's impacts on solid waste services, the applicable mitigation measures, and the significance findings after mitigation from the previously certified VCC EIR (April 1990).

Table 4.20-2
Impacts to Solid Waste Services Caused By VCC Implementation

Impact Description	Mitigation Measures	Finding After Mitigation
Project Impacts to Solid Waste Services - Development of the VCC project will reduce the lifespan of the Chiquita Canyon Landfill, which was found to be a significant impact.	• **VCC-SWS-1** Existing law requires a 25% reduction in the amount of solid waste going to landfills by 1995 and a 50% reduction by the year 2000. The users of the VCC will be required to comply with recycling programs. The County is currently researching and developing waste	Not significant

Table 4.20-2
Impacts to Solid Waste Services Caused By VCC Implementation

Impact Description	Mitigation Measures	Finding After Mitigation
	reduction, resource recovery, and recycling programs. When said programs are finalized, their implementation will result in a proportionate extension of the lifespan of the state's landfills.	
Cumulative Impacts to Solid Waste Services - Cumulative 2010 build-out of all pending, approved and recorded projects were anticipated to reduce the lifespan of the Chiquita Canyon Landfill. However, timely implementation of the proposed mitigation measure was found to reduce the potential severity of this cumulative impact to a level of insignificance.	• No further mitigation recommended.	Not significant

Source: VCC EIR (April 1990).

4.20.1.2.2 Entrada Planning Area

The applicant is seeking approval from the County of Los Angeles for planned residential and nonresidential development within the Entrada planning area. The SCP component of the proposed Project would designate an area within Entrada as a spineflower preserve. If approved, the SCP component would include take authorization of spineflower populations in Entrada that are located outside of the designated spineflower preserve area. Thus, the planned residential and nonresidential development within portions of the Entrada planning area is reliant on the SCP and associated take authorizations, and those portions would not be developed without the take authorizations. The applicant has submitted to Los Angeles County Entrada development applications, which cover the portion of the Entrada planning area facilitated by the SCP component of the proposed Project. However, as of this writing, the County has not yet issued a NOP of an EIR or released an EIR for Entrada. As a result, there is no underlying local environmental documentation for the Entrada planning area at this time.

4.20.2 METHODOLOGY

To determine the impact of the proposed Project and alternatives on solid waste services, the total amount of solid waste generated from site preparation (vegetation removal and grading activities) and construction activities, as well as an annual average solid waste generation over a 20-year build-out period, was determined. In addition, daily and yearly solid waste generation was estimated for build-out and full occupancy of the development facilitated by approval of the proposed Project and alternatives. The types of household hazardous waste, if any, also were identified and considered. The demand for waste disposal resulting from the proposed Project and alternatives was then compared to the ability of the local landfills to meet this anticipated demand.

4.20.3 REGULATORY SETTING

The regulatory framework for the solid waste disposal analysis generally consists of a requirement to provide adequate landfill capacity to existing and future customers. More specifically, state and local mandates require that adequate landfill capacity is available to serve proposed development projects.

4.20.3.1 Federal

National Environmental Policy Act of 1969. NEPA and associated CEQ guidelines require federal agencies to carry out their regulations, policies, and programs in accordance with NEPA's policies of environmental protection (42 U.S.C. §§ 4322 *et seq.*; 40 C.F.R. §§ 1500.1 *et seq.*). The Corps (NEPA lead agency) has the responsibility for administering this requirement.

4.20.3.2 State

California Environmental Quality Act. Under CEQA, lead agencies are required to evaluate potential environmental impacts that may result from a proposed project, including impacts related to utilities and service systems (*e.g.*, solid waste services). The CDFG has the responsibility for administering this requirement.

Subdivision Map Act. The Subdivision Map Act (Gov. Code, §§ 66410 *et seq.*) sets forth general provisions, procedures, and requirements for the division of land, including the provision of solid waste services.

California Integrated Waste Management Act. In 1989, California enacted the California Integrated Waste Management Act of 1989 (Assembly Bill 939), which requires cities and counties to reduce the amount of solid waste entering landfills by recycling, re-use, and waste prevention efforts. This legislation established a mandate that solid waste disposal in the state be reduced by at least 50 percent by the year 2000.

The California Integrated Waste Management Act of 1989 requires every city and county in the state, as part of the Countywide Integrated Waste Management Plan, to prepare a Source Reduction and Recycling Element that identifies how the jurisdiction will meet the mandatory state waste diversion goals of 25 percent by the year 1995 and 50 percent by the year 2000. The purpose of Assembly Bill 939 is to "reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible." Noncompliance with the goals and timelines set forth within the California Integrated Waste Management Act can be severe, as the bill imposes fines up to $10,000 per day on jurisdictions (cities and counties) not meeting these recycling and planning goals.

The term "integrated waste management" refers to the use of 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. Assembly Bill 939 has established the following waste management hierarchy:

- Source Reduction;

- Recycling;
- Composting;
- Transformation; and
- Disposal.

California Integrated Waste Management Board (CIWMB) Model Ordinance. Subsequent to Assembly Bill 939, additional legislation was passed to assist local jurisdictions in accomplishing the goals of Assembly Bill 939. The California Solid Waste Re-use and Recycling Access Act of 1991 (Pub. Resources Code, §§ 42900-42911) directs the CIWMB to draft a "model ordinance" relating to adequate areas for collecting and loading recyclable materials in development projects. If by September 1, 1994, a local agency did not adopt its own ordinance based on the CIWMB model, the CIWMB model ordinance took effect for that local agency.

The County of Los Angeles chose to use the CIWMB model ordinance as the County's ordinance.

4.20.3.3 Local

Newhall Ranch Specific Plan. As discussed in **Section 2.0**, Project Description, of this EIS/EIR, the approved Specific Plan provides the zoning framework for development within the Specific Plan site. With adoption of Los Angeles County General Plan Amendment No. 94-087-(5) on May 27, 2003, the Specific Plan is consistent with the policies of the Los Angeles County General Plan and Santa Clarita Valley Area Plan.

Los Angeles County General Plan. The Los Angeles County General Plan establishes a comprehensive statement of public policy guiding long-term development and resource protection for all incorporated lands within the County.

Santa Clarita Valley Area Plan. The Santa Clarita Valley Area Plan, in conjunction with other elements of the Los Angeles County General Plan, is a coordinated statement of public policy by Los Angeles County for use in making decisions relating to the future land uses within the Santa Clarita Valley. Chapter 2, Infrastructure and Community Services, of the Plan includes the Circulation and Human Resources Elements that served as a guideline to identify existing services and programs and/or to identify the need for new services for all members of the community.

County of Los Angeles Solid Waste Management Action Plan. In 1988, the County of Los Angeles Board of Supervisors approved the Los Angeles County Solid Waste Management Action Plan to provide for the long-range management of the solid waste generated within the County. The plan includes source reduction, recycling and composting programs, household hazardous waste management programs, and public education awareness programs. The plan concludes that landfilling 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 outside the County.

County of Los Angeles Source Reduction and Recycling Element. The County's Source Reduction and Recycling Element was prepared in response to Assembly Bill 939. It describes policies and programs that will be implemented by the County for unincorporated areas in order to achieve the state's mandates of 25 and 50 percent waste disposal reductions by the years 1995 and 2000, respectively. Per the California Integrated Waste Management Act, the Source Reduction and Recycling Element projects disposal capacity needs for a 15-year period. The current Source Reduction and Recycling Element's 15-year period commenced in 1993.

County of Los Angeles Household Hazardous Waste Element. The California Integrated Waste Management Act also requires every city and county within the state to prepare a Household Hazardous Waste Element that provides for the management of household hazardous waste generated by the residents within its jurisdiction. The County's household hazardous waste management program, consisting of collection and public education/information services, has been developed to serve residents throughout the County in a convenient and cost-effective manner. In addition to reducing the amount of waste that might otherwise be sent to a landfill, as required by the California Integrated Waste Management Act, these programs are important facets in the County's effort to clean up the solid waste stream.

County of Los Angeles Non-Disposal Facility Element. The California Integrated Waste Management Act requires every city and county within the state to prepare and adopt a Non-Disposal Facility Element that identifies all existing, expansions of existing, and proposed new non-disposal facilities that will be needed to implement the local jurisdiction's Source Reduction and Recycling Element. The County's Non-Disposal Facility Element identifies 20 existing materials recovery facilities/transfer stations, and nine proposed material recovery facilities as non-disposal facilities that the County intends to utilize to implement its Source Reduction and Recycling Element and meet the diversion requirements of the California Integrated Waste Management Act. In addition, the County's Non-Disposal Facility Element also identifies the utilization of four landfill facilities, operated by the County Sanitation Districts of Los Angeles County, for diversion of yard/green waste which is intended to be used as alternative daily cover at the landfills.

Los Angeles County Municipal Code, Chapter 20.87, Construction and Demolition Debris Recycling and Re-use. The County of Los Angeles Board of Supervisors has determined that recycling and re-use of construction and demolition debris significantly reduces the amount of material that is disposed in landfills. As a result, on January 4, 2005, the County Board of Supervisors adopted a Construction and Demolition Debris Recycling and Re-use Ordinance. The Ordinance added chapter 20.87, Construction and Demolition Debris Recycling and Re-Use, to title 20 of the Los Angeles County Municipal Code. The purpose of the chapter is to increase the recycling and re-use of construction and demolition debris, consistent with the goals of the California Integrated Waste Management Act of 1989.[2]

[2] Under chapter 20.87, construction and demolition debris (C&D debris) is defined as "material, other than hazardous waste, radioactive waste, or medical waste, that is generated by or results from construction or demolition-related activities including, but not limited to: construction, deconstruction, demolition, excavation, land clearing, landscaping, reconstruction, remodeling, renovation, repair, and

Chapter 20.87 requires recycling or re-use of at least 50 percent of construction and demolition debris generated by "projects" in the unincorporated areas of Los Angeles County.[3] Prior to the issuance of any permit under title 26, chapter 1, section 106 of the Los Angeles County Municipal Code, a project proponent must prepare and submit a written Recycling and Re-use Plan (RRP) to the County of Los Angeles Department of Public Works (DPW) Environmental Programs Division. In order to demonstrate compliance with the code, the RRP must describe the project and provide an estimate of the total weight of the project construction and demolition debris that will be recycled and reused. Permits applied for under title 26, chapter 1, section 106 will only be issued if the Director of DPW reviews and approves the RRP.

In addition, in order to show continuing compliance with chapter 20.87, chapter 20.87 requires submittal of project progress updates to the DPW, in order to demonstrate continuing compliance with the Chapter 20.87. An initial progress report must be submitted to the Director no later than 90 days after issuance of the first permit for the project, and annual progress reports must be submitted thereafter. Chapter 20.87 also requires submittal of a final compliance report no later than 45 days following project completion.

Any violations of the provisions set out in chapter 20.87 are subject to administrative penalty, enforcement, and collection proceedings.

4.20.4 EXISTING CONDITIONS

DPW is responsible for developing plans and strategies to manage solid and hazardous waste generated in the County's unincorporated areas and addressing the disposal needs of Los Angeles County as a whole. In the past, solid waste generated throughout the state was collected and disposed of at landfills in the local vicinity. More recently, many jurisdictions, including the County of Los Angeles, are stating that existing local landfill space may reach its capacity in the very near future. Even with waste reduction and recycling efforts, many jurisdictions are having tremendous difficulty approving new local landfill space or alternative means of disposal to address the anticipated future shortage of landfill space.

Currently, most solid waste is disposed of in landfills. The amount of waste diverted from landfills has increased as jurisdictions throughout the state comply with the provisions of the California Integrated Waste Management Act. The diversion of solid waste from landfills will increase the life expectancy of landfills, but will not eliminate the need for new landfills. As growth occurs throughout Southern

site clean-up. C&D debris includes, but is not limited to: asphalt, concrete, brick, lumber, gypsum wallboard, cardboard and other associated packaging, roofing material, ceramic tile, carpeting, plastic pipe, steel, rock, soil, gravel, tree stumps, and other vegetative matter."

[3] For the purpose of chapter 20.87, "Project" means: (1) Any work, requiring one or more permits, the total value of which exceeds $100,000 as determined pursuant to section 107.1 of Chapter 1 of title 26 of the Los Angeles Municipal Code; (2) Any work, requiring one or more permits, which consists only of the demolition of a structure or structures, irrespective of the total value of the demolition work; or (3) Any work, requiring one or more permits, which consists only of grading, irrespective of the total value of the grading work. (Los Angeles County Municipal Code, §§ 20.87.030A and 20.87.030I.)

California, new landfills will need to be developed and/or other waste disposal alternatives will need to be implemented.

It is expected that new and expanded landfills would be approved as part of a comprehensive solid waste program. It is unrealistic to assume that all existing landfill space will reach capacity and no new landfill space will be made available. The existing population continues to generate solid waste and expects it to be collected and disposed. If no space existed in local or regional landfills and waste accumulated, serious health problems (*e.g.*, disease) would result and state and local agencies would be forced to address the issue. Since it is impossible to halt the generation of solid waste, it is likely that the state would intervene and implement new landfilling and/or other disposal options.

In response to this dilemma, alternative methods of collection, transfer, disposal, and the reduction, recycling and re-use of solid waste have been considered. It is speculative to identify specific options for waste disposal that will exist 20, 50, or 100 years from now. Disposal options that have been discussed at the state and County levels, as well as by the private waste disposal industry, include expansion of existing landfills, development of new local landfills, transfer of solid waste out of the County or state by truck or rail car, and incineration of old waste within local and regional co-generation plants. Options to reduce the amount of waste disposed of in landfills have included curbside collection and separation of recyclable materials. Both the technology and economics for these options are changing rapidly. For example, 20 years ago, few people would have envisioned the amount of recycling that occurs today. The management of future solid waste disposal is largely an open market, regulated by various government controls.

Currently, most solid waste is collected within Los Angeles County by private haulers and disposed of within the County. However, this does not preclude independent solid waste haulers from taking solid waste across County lines for disposal. In fact, the U.S. Supreme Court has ruled that jurisdictional solid waste disposal restrictions infringe on a landfill operator's ability to actively participate in interstate commerce.[4] In that case, the Supreme Court ruled that the city of Philadelphia could not prevent the state of New Jersey from bringing solid waste to Philadelphia for disposal.

The DPW maintains that long-term waste disposal needs can only be met with in-County and out-of-County disposal capacity, and indicates that prudent public policy includes a balance of in-County and out-of-County disposal to provide for the long-term disposal needs of the County. Greater inter-county transfer of solid waste may occur in the near future if landfills outside of Los Angeles County provide greater economic advantages to haulers or if landfills within the County reach capacity. However, demonstration of the potential for in-County waste disposal capacity and expansion is important in order to effectively negotiate out-of-County disposal contracts. If the County becomes totally reliant on out-of-County disposal capacity, it would have little negotiating leverage against unfavorable pricing structures.

The increase in recycling rates is attributable in part to the privatization that is occurring within the solid waste industry. In the past, many municipalities provided solid waste collecting services, disposing of the waste in their own landfills. Today, solid waste has become a commodity that has supported the

[4] *City of Philadelphia v. New Jersey* ~~(1978)~~ 437 U.S. 617 ~~(1978)~~.

growth of the private solid waste-handling industry. In this free-enterprise system, private waste haulers compete to collect and dispose of solid waste largely because of the difficulty that municipalities have in approving new disposal sites. Private solid waste haulers dispose of their loads at landfills that provide them the greatest economic advantage (considering location, transportation cost, and disposal tipping fees). As local landfills reach capacity, economic forces will further drive the collection and disposal of solid waste.

Two landfills outside Los Angeles County that could receive Los Angeles area waste by rail car and provide long-term solid waste disposal capacity for Los Angeles have been proposed. The Mesquite Regional Landfill in southern Imperial County and the Eagle Mountain Landfill in Riverside County are both owned by the Sanitation Districts of Los Angeles County (Sanitation Districts) and can provide more than 100 years of disposal capacity for Los Angeles County.[5] The Mesquite Regional Landfill is ~~proposed to be operational in 2008, and~~ permitted to accept up to 20,000 tons of waste each day for the next 100 years. Construction of the rail spur and rail yard necessary to receive waste-by-rail is expected to be completed in 2011/2012. The Eagle Mountain Landfill, ~~which~~ also was permitted for 20,000 tons per day for 100 years; however, this landfill has been the subject of litigation. The most recent litigation was brought by a conservation association and two individuals (plaintiffs) challenging the Bureau of Land Management's (BLM) approval of the landfill developer's request to exchange certain private lands for several parcels of surrounding BLM-owned land. (See *National Parks Conservation Assn. v. Bureau of Land Management*, 586 F.3d 735 (9th Cir. 2009).) In this decision, the Ninth Circuit affirmed in part and reversed in part the district court's decision in favor of plaintiffs on Federal Land and Policy Management Act and NEPA claims. In short, the Ninth Circuit held that the BLM should have taken the probable use of public lands for a landfill into consideration as part of its highest and best use analysis in connection with the land exchange. It also found that BLM's EIS did not adequately consider project alternatives and the potential for eutrophication. ~~, recently received a federal ruling regarding the litigation between the National Parks Conservation, Donna and Larry Charpied, the Center for Community Action and Justice, and the Desert Protection Society as the plaintiffs, and Kaiser Eagle Mountain, Inc. and Mine Reclamation Corporation as defendants. The ruling, which was issued on September 20, 2005, cited, among other issues, deficiencies in the land exchange approved by the Bureau of Land Reclamation and the environmental analysis. Defendants are appealing the ruling.~~[6]

In addition to out-of-County landfills, incineration facilities may provide an alternative to in-County landfills, serving a dual function of disposing of solid waste and generating regional power supplies. If local landfills are not expanded or developed and solid waste is hauled to distant locations, incineration facilities also may become an economically attractive means of disposing of solid waste.

Because of the difficulty in predicting future solid waste generation and disposal alternatives, it became necessary in this EIS/EIR to formulate a method to evaluate impacts on the landfills that are most likely to serve the Project site. Specifically, this EIS/EIR section assesses the potential solid waste generation of the proposed Project relative to the capacity of the existing landfills operating within Los Angeles County that accept waste from unincorporated areas. This is considered a worst-case scenario relative to

[5] Sanitation Districts of Los Angeles County, Fiscal Year 2004-2005 in Review.

[6] ~~*Ibid.*~~

the availability of future in-County landfill capacity, as it does not assume the development of any new landfills, the use of out-of-County landfills, or the implementation of any other disposal options. It is unrealistic to assume that no changes would occur in this respect.

4.20.4.1 Existing Solid Waste Generation

Statewide Solid Waste Generation. In California, 71.8 million tons of solid waste were generated in 2002.[7] Some of the solid waste stream was diverted from landfills through various source reduction, recycling, and re-use efforts. The diversion rate in the state was 48 percent in 2002.[8]

Regional Solid Waste Generation. A total of 1.1 million tons of solid waste were disposed of within unincorporated Los Angeles County during the year 2000.[9] Some of the solid waste stream was diverted from landfills through various source reduction, recycling, and re-use efforts. The diversion rate in unincorporated Los Angeles County has increased since 1995. The diversion rate was 27 percent in 1995, 29 percent in 1996, 40 percent in 1998, and 40 percent in 1999.[10] The CIWMB granted the County an extension until December 2004 to comply with the required 50 percent diversion rate. The CIWMB reported that the 2004 diversion rate for Los Angeles County was 53 percent.[11]

Site-Specific Solid Waste Generation. The Project area is presently open area with some irrigated agricultural uses, cattle grazing, oil and gas operations, and natural and disturbed habitat. These operations contribute a quantitatively insignificant amount of solid waste to the Project area's waste stream.

4.20.4.2 Existing Solid Waste Collection and Disposal

Solid Waste Collection. Residential, commercial, and industrial trash collection in the unincorporated areas of Los Angeles County is handled by private haulers. These haulers operate in a free-enterprise system and make their profits by collecting disposal fees. When collected, the waste may be taken to any

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7 See *Statewide Waste Generated, Diverted and Disposed*, California Integrated Waste Management Board, available online at http://www.ciwmb.ca.gov/LGCentral/Rates/Graphs/RateTable.htm (last visited March 31, 2009).

8 *Ibid.*

9 See *Jurisdiction Profile for Los Angeles County (Unincorporated): Jurisdiction Disposal, Generation and Diversion Tonnages for Years with Board Approved Diversion Rates*, California Integrated Waste Management Board, available online at http://www.ciwmb.ca.gov/Profiles/Juris/JurChart.asp?RG=U&RES=0.484&JURID=274&JUR=Los+Angeles-Unincorporated&Chartname=DIVDISPGEN.ASP (last visited March 31, 2009).

10 See *Jurisdiction Profile for Los Angeles County (Unincorporated): Overall Waste Stream: Diversion*, California Integrated Waste Management Board, available online at http://www.ciwmb.ca.gov/Profiles/Juris/JurProfile2.asp?RG=U&RES=0.484&JURID=274&JUR=Los+Angeles-Unincorporated (last visited March 31, 2009)..

11 *Ibid.*

landfill that is willing to accept it. The private haulers are free to operate in any of the unincorporated areas of the County, as well as outside the County. In 2003, about 160 haulers were permitted by the County of Los Angeles Department of Health Services to collect residential, commercial, and industrial waste in unincorporated Los Angeles County.[12]

Solid Waste Disposal. In June 1996, Los Angeles County prepared a Siting Element to project waste generation and waste disposal capacity within the County. Projections are made for 15-year planning periods, and DPW updates the Siting Element annually. The most recent report is the Los Angeles County Integrated Waste Management Plan, 2003 Annual Report on the Countywide Summary Plan and Countywide Siting Element (March 2005).

Figure 4.20-1, Locations of Major Los Angeles County Landfill Sites, illustrates the locations of Los Angeles County landfills in relation to the Project site, while **Table 4.20-3**, Existing Landfill Capacity and Regional Needs Analysis for Los Angeles County, identifies the anticipated remaining capacity and anticipated remaining years of operation of each landfill.[13]

Recent expansions at the Chiquita Canyon, Antelope Valley, Lancaster, and Puente Hills Landfills are reflected in **Table 4.20-3**. A number of landfills in **Table 4.20-3** have an anticipated life expectancy that extends beyond 2020, which is the end of the current 15-year planning period based on the most recent Siting Element report (published March 2005). For example, the Lancaster Landfill was approved for expansion to extend the life of this landfill to 2030,[14] and the Burbank, Chiquita Canyon, Pebbly Beach, San Clemente, Scholl, and Whittier (Savage Canyon) Landfills are permitted until 2054, 2019, 2033, 2032, 2019, and 2025, respectively.[15] The capacity of each landfill is regulated by the amount of solid waste that each facility is permitted to collect per day, and by the total ultimate capacity.

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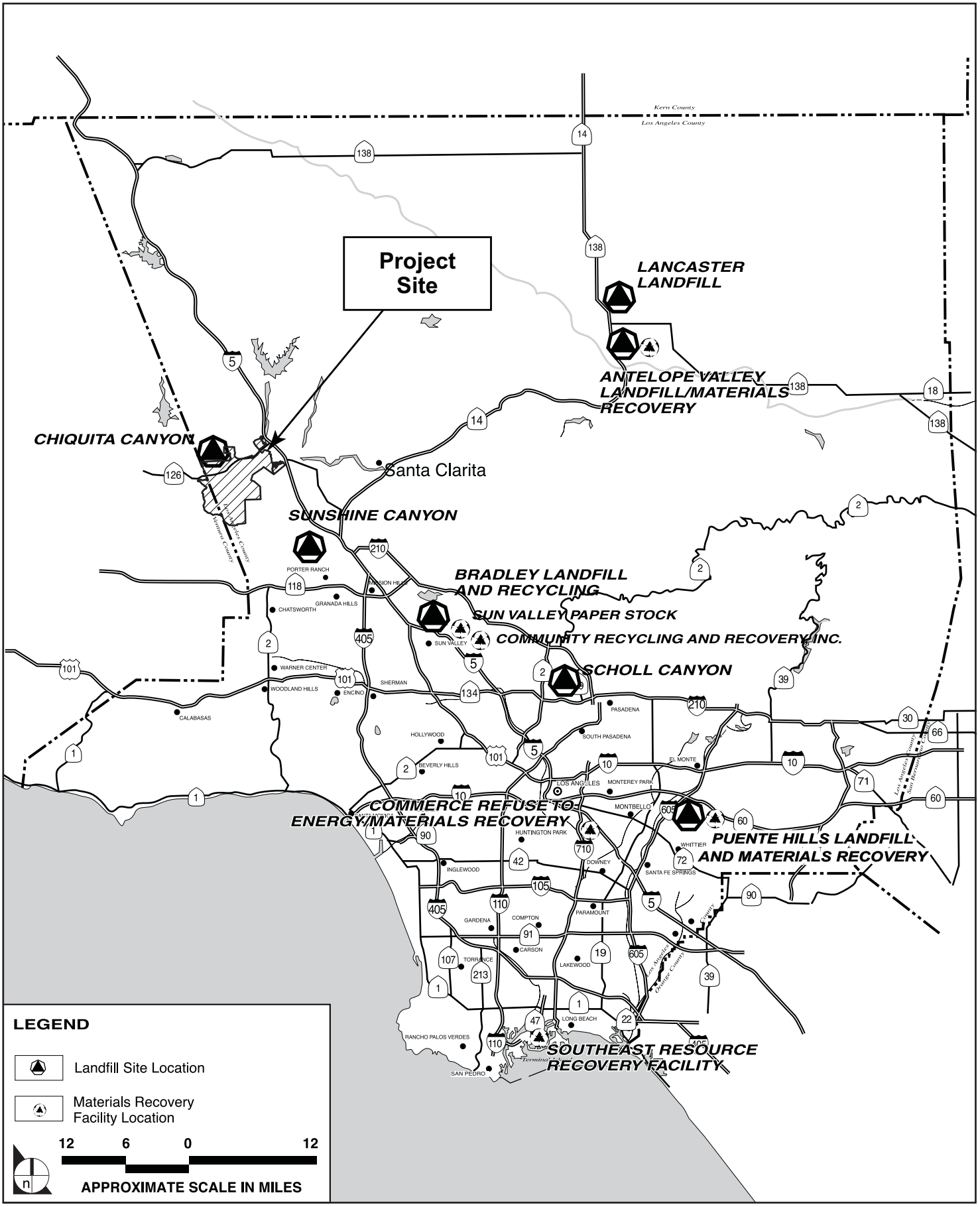
12 Telecommunication with George De La O, Civil Engineer, Los Angeles County Department of Public Works (March 7, 2008).

13 **Table 4.20-3** is based on the Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2003 Annual Report on the Countywide Summary Plan and Countywide Siting Element (March 2005).

14 Telecommunication with Kay Krumwied, Lancaster Landfill (December 4, 2002). A life expectancy to 2030 assumes the acceptance of the maximum daily tonnage of 1,700 tons of solid waste.

15 California Integrated Waste Management Board website (July 30, 2004).



SOURCE: Impact Sciences, Inc. – October 2004

FIGURE **4.20-1**

Locations of Major Los Angeles County Landfill Sites

Table 4.20-3
Existing Landfill Capacity and Regional Needs Analysis for Los Angeles County

Year	Waste Generation Rate	Percent Diversion	Total Disposal Need	Maximum Daily Transformation Capacity	Class III Landfill Disposal Need	1	2	3	4	5	6	7	8	9	10	11	12	Class III Landfill Daily Disposal Capacity Shortfall (Excess)
						EXISTING LANDFILLS												
						Antelope Valley	Bradley	R Burbank[6]	R Calabasas	Chiquita[6]	Lancaster[7]	Pebbly Beach[6]	L Puente Hills	R San Clemente	R Scholl[6]	Sunshine	Whittier[6, 8]	
						Expected Daily Tonnage 6 Day Average (tpd-6) Remaining Permitted Landfill Capacity at Year's End (Million Tons)													
	(tpd-6)		(tpd-6)	(tpd-6)	(tpd-6)													(tpd-6)
2002	73,866	50.00%	36,933			847	2,245	128	1,041	4,681	864	14.3	11,761	2.3	1,194	5.714	269	
						9.2	1.1	3.5	11.0	17.2	13.8	0.102	3.1	0.013	8.2	8.1	4.8	
2003	74,422	50.00%	37,211	2,069	35,142	1,800	1,800	129	1,049	5,000	1,700	14.4	12,000	2.3	1,203	6,000	271	4,172
													E					
						8.6	0.6	3.5	10.7	15.7	13.3	0.098	40.6	0.012	7.8	6.2	4.8	
2004	75,217	50.00%	37,609	2,069	35,539	1,800	1,500	131	1,060	5,000	1,700	14.5	13,200	2.4	1,216	11,000	274	(1,359)
																E		
						8.0	0.1	3.4	10.3	14.1	12.8	0.093	36.5	0.011	7.4	75.8	4.7	
2005	76,798	50.00%	38,399	2,069	36,330	1,800	2,000	134	1,082	5,000	1,700	14.8	13,200	2.4	1,242	11,000	280	(1,125)
							E											
						7.5	3.2	3.4	10.0	12.6	12.3	0.088	32.3	0.011	7.1	72.4	4.6	
2006	78,944	50.00%	39,472	2,069	37,403	1,800	5,000	137	1,112	5,000	1,700	15.2	13,200	2.5	1,277	11,000	288	(3,129)
						6.9	1.7	3.3	9.7	11.0	11.7	0.084	28.2	0.010	6.7	68.9	4.5	
2007	81,099	50.00%	40,550	2,069	38,480	1,800	5,000	141	1,143	5,000	1,700	15.7	13,200	2.5	1,311	11,000	296	(2,129)
						6.4	C	3.3	9.3	9.4	11.2	0.079	24.1	0.009	6.3	65.5	4.4	
2008	83,351	50.00%	41,675	2,069	39,606	1,800		145	1,175	5,000	1,700	16.1	13,200	2.6	1,348	11,000	304	3,916
						5.8		3.2	8.9	7.9	10.7	0.074	20.0	0.0083	5.8	62.1	4.3	
2009	85,470	50.00%	42,735	2,069	40,666	1,800		149	1,204	5,000	1,700	16.5	13,200	2.7	1,382	11,000	312	4,900
						5.2		3.2	8.6	6.3	10.1	0.069	15.9	0.074	5.4	58.6	4.2	
2010	87,522	50.00%	43,761	2,069	41,692	1,800		152	1,233	5,000	1,700	16.9	13,200	2.7	1,415	11,000	319	5,852
						4.7		3.2	8.2	4.8	9.6	0.063	11.7	0.0066	5.0	55.2	4.1	
2011	89,614	50.00%	44,807	2,069	42,738	1,800		156	1,263	5,000	1,700	17.3	13,200	2.8	1,449	11,000	327	6,823
						4.1		3.1	7.8	3.2	9.1	0.058	7.6	0.0054	4.5	51.8	4.0	
2012	91,623	50.00%	45,811	2,069	43,742	1,800		159	1,291	5,000	1,700	17.7	13,200	2.9	1,482	11,000	334	7,755

Table 4.20-3
Existing Landfill Capacity and Regional Needs Analysis for Los Angeles County

Year	Waste Generation Rate	Percent Diversion	Total Disposal Need	Maximum Daily Transformation Capacity	Class III Landfill Disposal Need	1	2	3	4	5	6	7	8	9	10	11	12	Class III Landfill Daily Disposal Capacity Shortfall (Excess)
						EXISTING LANDFILLS												
						Antelope Valley	Bradley	R Burbank[6]	R Calabasas	Chiquita[6]	Lancaster[7]	Pebbly Beach[6]	L Puente Hills	R San Clemente	R Scholl[6]	Sunshine	Whittier[6, 8]	
						Expected Daily Tonnage 6 Day Average (tpd-6) Remaining Permitted Landfill Capacity at Year's End (Million Tons)													
						3.5		3.1	7.4	1.6	8.5	0.052	3.5	0.0048	4.0	48.3	3.9	
2013	93,589	50.00%	46,795	2,069	44,726	1,800		163	1,319	5,000	1,700	18.1	13,200	2.9	1,513	11,000	341	8,668
						3.0		3.0	7.0	0.1	8.0	0.047	C	0.0039	3.6	44.9	3.8	
2014	95,838	50.00%	47,919	2,069	45,850	1,800		167	1,350	C	1,700	18.5		3.0	1,550	11,000	350	27,912
						2.4		3.0	6.5		7.5	0.041		0.0029	3.1	41.5	3.7	
2015	98,073	50.00%	49,036	2,069	46,967	1,800		163	1,319		1,700	18.1		2.9	1,5133	11,000	341	28,949
						1.9		2.9	6.1		7.0	0.035		0.0020	2.6	38.0	3.6	
2016	100,318	50.00%	50,159	2,069	48,090	1,800		174	1,414		1,700	19.4		3.1	1,622	11,000	350	29,975
						1.3		2.8	5.7		6.4	0.029		0.0011	2.1	34.6	3.5	
2017	102,300	50.00%	51,150	2,069	49,081	1,800		178	1,442		1,700	19.7		3.2	1,654	11,000	350	30,888
						0.7		2.8	5.2		5.9	0.023		0.0001	1.6	31.2	3.4	

Assumptions:

1. The Waste Generation Rate (excluding the inert waste being handled at permitted unclassified landfills) was estimated using the CIWMB's Adjustment Methodology, utilizing population projection available from State Department of Transportation, and employment and taxable sales projections available from UCLA.
2. Diversion Rate is 50 percent for years 2002 through 2017.
3. Expected Daily Tonnage Rates are based on permitted daily capacity for the Antelope Valley, Chiquita, Lancaster, Puente Hills, and Sunshine Landfills. The expected daily tonnage rate for Burbank, Calabasas, Pebbly Beach, San Clemente, Scholl, and Whittier (Savage) Landfills are based on the average daily tonnages for the period of 1/1/02 to 12/31/02.
4. Expected Daily Tonnage Rate for Bradley Landfill Expansion is based on the historical use of this landfill.
5. "tpd-6": tons per day, 6 day per week average.
6. Anticipated closures per *Facility/Site Summary Details*, CIWMB, available online at http://www.ciwmb.ca.gov/SWIS/search.aspx (last visited March 31, 2009): Burbank-2054; Chiquita-2019; Pebbly Beach-2033; San Clemente-2032; Scholl-2019.
7. Anticipated closure 2030, per telecommunication with Kay Krumwied, Lancaster Landfill (December 4, 2002).
8. Whittier Landfill has a disposal limitation of 350 tons per day per email communication with Nelly Castellanos (July 6, 2006).

Legend:

C	Closure due to exhausted capacity
E	Expansion becomes effective
L	Does not accept waste from the City of Los Angeles and Orange County
R	Restricted Wasteshed
CIWMB	California Integrated Waste Management Board

Source: Los Angeles County Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan 2002 Annual Report – Part II: Siting Element Assessment, Appendix E-2.7 (February 2004).

The landfills in **Table 4.20-3** are classified as major landfills, which are defined as those facilities that receive more than 50,000 tons of solid waste per year. Additionally, these landfills are classified as Class III landfills since they are permitted to accept only non-hazardous waste. As shown in **Table 4.20-3**, with the approval of the Antelope Valley, Bradley, Chiquita, Lancaster, and Puente Hills Landfill expansions, Los Angeles County's landfills have adequate capacity to service the existing population and planned growth until the year 2017. After that time, the amount of solid waste generated in Los Angeles County each day would exceed the daily disposal capacity at existing Los Angeles County landfills.

However, it is expected that capacity will extend beyond the year 2017, as noted above, particularly when combined with events that have expanded landfill capacity within the County. This includes recent agreements between Orange County and Waste Management, Inc. (WMI), which divert to Orange County 168,000 tons of waste per year that was previously imported into Los Angeles County from San Diego County. In addition, an agreement between Orange County and Taormina Industries, which mainly serves Los Angeles County, calls for 2,000 tons of solid waste per day to be diverted to Orange County landfills.[16]

Currently, solid waste collected from the Santa Clarita Valley area primarily goes to the Chiquita Canyon Landfill (located immediately to the north and east of the Specific Plan site) and/or to the Sunshine Canyon Landfill located in Sylmar. However, more distant landfills are capable of receiving solid waste from the area. For instance, the Antelope Valley Landfill in Palmdale, Bradley West Landfill in Sun Valley, Lancaster Landfill in Lancaster, and the Simi Valley Landfill in Simi Valley could all potentially accept waste from the Santa Clarita Valley.

4.20.4.3 Hazardous Materials Collection and Disposal

As discussed above, Los Angeles County has prepared a Household Hazardous Waste Element to provide for management of household hazardous waste generated by the residents within its jurisdiction.

Certain uses and activities generate hazardous waste that must be disposed at locations other than Class III or unclassified landfills. A generator is a person or business whose acts or processes produce hazardous waste or who, in some other manner, causes a hazardous substance or waste to become subject to the California Hazardous Waste Control Law (Health & Saf. Code, §§ 25100-25249). The hazardous waste must be transported to a licensed disposal or treatment facility. Generators that use hazardous materials and/or generate hazardous waste are responsible for the disposal of such waste. There are many licensed private contractors that transport and dispose hazardous waste.

DPW has indicated that existing hazardous waste management facilities within the County are inadequate to meet the hazardous waste currently generated within Los Angeles County.[17] However, there are

[16] Approaching an Integrated Solid Waste Management System for Los Angeles County, California (May 2, 1997) GBB, Solid Waste Management Consultants.

[17] Written correspondence from Rod Kubomoto, Watershed Management Division, County of Los Angeles Department of Public Works (April 21, 2004).

several Class I and II landfills that exist in Southern and Central California that can currently accept hazardous waste generated within the County. Each is described briefly below:

- **Laidlaw Landfill, Buttonwillow, Kern County, California:** This facility accepts hazardous and non-hazardous waste and is permitted as a Class I landfill. The facility has no restrictions for the amount of waste that can be accepted on a daily basis.

- **Kettleman Hills Landfill, Kettleman City, Kings County, California:** This is a Class I permitted landfill that accepts hazardous and non-hazardous waste with no capacity restrictions.

- **McKittrick Waste Treatment Site, McKittrick, Kern County, California:** This facility is a Class II permitted landfill that accepts hazardous and non-hazardous waste. The facility has a capacity restriction of 1,180 tons/day.[18]

Specific to household hazardous waste, the DPW Household Hazardous Waste and Electronic Waste Management Program operates household hazardous waste collection events, which are one-day, drive-through events where residents are invited to drive to a specific location to drop off their hazardous waste. Collection events are free, open to the public, and scheduled in different areas throughout the County.[19]

Household hazardous waste collected by the County is either re-used or packed in drums for disposal. Most of the paint is re-used for the County's anti-graffiti program. Motor oil is recycled/re-used as lubricant, marine diesel fuel, supplemental fuel, and tar byproducts, such as asphalt cover and re-refined motor oil. Miscellaneous solvents are re-used as supplemental fuel in the manufacture of cement.[20]

4.20.5 IMPACT SIGNIFICANCE CRITERIA

The significance criteria listed below are derived from Appendix G of the State CEQA Guidelines. The Corps has agreed to use the CEQA criteria presented below for purposes of this EIS/EIR, although significance conclusions are not expressly required under NEPA. The Corps also has applied additional federal requirements as appropriate in this EIS/EIR. The impacts to solid waste disposal services would be significant if implementation of the proposed Project or the alternatives would result in:

1. Service by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs (Significance Criterion 1); and/or

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18 See *Active Landfills Profile for McKittrick Waste Treatment Site (15-AA-0105)*, California Integrated Waste Management Board, available online at http://www.ciwmb.ca.gov/Profiles/Facility/LandFill/LFProfile1.asp?COID=15&FACID=15-AA-0105 (last visited March 31, 2009).

19 See *LA County DPW Household Hazardous Waste Guide*, Los Angeles County Department of Public Works, available online at http://ladpw.org/epd/hhw/collection.cfm (last visited March 31, 2009).

20 *Ibid.*

2. Noncompliance with federal, state, and local statutes and regulations related to solid waste (Significance Criterion 2).

4.20.6 IMPACTS OF THE PROPOSED PROJECT AND ALTERNATIVES

This section assesses the direct, indirect, and secondary impacts related to solid waste impacts based upon the regulatory setting, existing conditions, and significance criteria described above. Direct impacts are impacts that are a result of the construction, operation, and maintenance of the proposed Project and alternatives. Indirect impacts are impacts from the development facilitated by the Specific Plan, VCC, and a portion of the Entrada planning area. Secondary impacts are those that would occur beyond the Project site as a result of the proposed Project or alternatives.

4.20.6.1 Impacts of Alternative 1 (No Action/No Project)

Under Alternative 1, no action would be taken and the proposed Project would not be developed. Therefore, under this alternative, there would be no construction of bridges, bank stabilization, grade control structures, detention basins, or other infrastructure proposed under the RMDP component of the proposed Project. Consequently, Alternative 1 would not result in any direct impacts to the environment. Similarly, with respect to indirect and secondary impacts, under Alternative 1, no permits facilitating development within the Specific Plan area, VCC planning area, or portions of the Entrada planning area would be issued. Therefore, Alternative 1 would not result in construction or operational activities, which would create a demand for landfill capacity, or otherwise fail to comply with solid waste regulations indirectly or otherwise. In sum, Alternative 1 would not result in any of the solid waste-related impacts associated with the other Project alternatives.

4.20.6.2 Impacts of Alternative 2 (Proposed Project)

4.20.6.2.1 Direct Impacts

RMDP Direct Impacts. Construction activities associated with installation of the RMDP infrastructure would primarily include grading and excavation, installation of bank stabilization, bridges, and other drainage facility-related construction. During grading, the movement of earthen materials to allow for ultimate installation of improvements would occur on portions of the Specific Plan site. No off-site import or export of earthen materials is anticipated during this stage of Project construction. Grading would be followed by the installation of drains, bank stabilization, concrete bridges, *etc*. Once installed, certain RMDP components would be covered with earthen materials. Once in place, the infrastructure constructed under this alternative may generate an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities within Los Angeles County due to maintenance and repair activities on an as-needed basis.

These construction activities would occur at various locations within the Project area over the estimated 20-year build-out period, with individual construction periods estimated from six to twenty-four months; however, not all construction projects would unfold at the same time. For example, while buried bank stabilization for the Santa Clara River (see **Figure 4.15-10**) may be installed concurrently with

construction of the Long Canyon Road Bridge (as proposed for the Landmark Village development), the timing of many construction projects will not overlap. It also could be the case that buried bank stabilization would be installed near the Newhall Ranch WRP, while grading is occurring simultaneously to make way for drains and outfalls (see **Figure 4.15-11**) on the Mission Village portion of the Specific Plan site. However, there also may be a period during the 20-year build-out of the Specific Plan where no construction occurs.

In all instances, the types of construction activities are not high solid waste generators. For example, typical solid waste associated with mass grading activities and utility installation that could enter landfills includes ground and vegetation litter and construction debris. Even though these construction activities are not considered high solid waste generators, the waste generated by installation of the RMDP infrastructure would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities within Los Angeles County; this is considered a significant impact under Significance Criterion 1. This is because, while area landfills can accommodate the proposed Project's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent. (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative 2 would not result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The proposed SCP would dedicate 167.6 acres of privately-owned land within the Specific Plan area and Entrada planning area to CDFG as spineflower preserves. Implementation of the SCP component of the proposed Project would not result in the demand for solid waste services at the local landfills that serve the Project area. Therefore, implementation of the proposed SCP would not result in direct impacts under Significance Criteria 1 or 2.

4.20.6.2.2 Indirect Impacts

RMDP Indirect Impacts. The proposed Project would facilitate build-out of the Newhall Ranch Specific Plan. Build-out of the Specific Plan would occur on a tract-by-tract basis over an approximately 20-year period. Construction activities associated with the development of land uses allowed by the Specific Plan include grading and excavation, utility corridor construction, installation of utility infrastructure, construction of new roadways, realignment and improvement of existing roadways (within and outside of the Project area), and building construction. Ultimately, build-out of the Specific Plan under Alternative 2 would result in the development of 20,885 dwelling units and over 5.5 million square feet of nonresidential uses.

Both development phases -- construction and operation -- would result in a demand for solid waste disposal services. As estimated in the Newhall Ranch Specific Plan Program EIR, site preparation and construction activities would generate a total of approximately 550,000 tons, or approximately 22,000 tons per year, of construction waste over the 20-year build-out of the Specific Plan, assuming no recycling; or approximately 275,000 total tons, using recycling practices assuming a 50 percent diversion rate. These waste materials are expected to consist of typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green waste. Following build-out of the Specific Plan's land uses, the Specific Plan would generate approximately 293,281 pounds of solid waste per day, or 53,524 tons per year.

Although it is likely that solid waste generated during build-out of the Specific Plan would go to the Chiquita Canyon Landfill (located immediately to the north and east of the Specific Plan site), and/or to the Sunshine Canyon Landfill located in Sylmar, other more distant landfills are capable of receiving solid waste from the area. For instance, the Antelope Valley Landfill in Palmdale, Bradley West Landfill in Sun Valley, Lancaster Landfill in Lancaster, and the Simi Valley Landfill in Simi Valley could all potentially accept waste from the Project area.

The County of Los Angeles identifies landfill capacity in 15-year planning periods, the most recent of which ends in 2020.[21] Recent landfill expansion approvals and proposals for expansion at several County landfills indicate that solid waste disposal facilities and other waste management options will be available beyond this date. However, because Los Angeles County has not definitively identified an adequate supply of landfill space beyond 2020, for purposes of this analysis, ~~the~~ project-generated increases in solid waste ~~would cause a~~ that would necessarily occur beyond the County's 2020 planning horizon are considered to result in a significant indirect impact under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by the Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation resulting from residential and commercial uses developed on the Specific Plan site would generally consist of household-type wastes, such as garden and automotive products, lubricants, paints, cleaners, batteries, and electronic waste. Los Angeles County has implemented programs for the collection and management of these types of wastes, which are typically collected, recycled, or rendered non-hazardous in order to avoid disposal at hazardous waste landfill facilities. Therefore, development on the Specific Plan site facilitated by the RMDP would not result in significant hazardous waste disposal impacts under Significance Criteria 1 or 2.

[21] Los Angeles County Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan, 2005 Annual Report on the Countywide Summary Plan and Countywide Siting Element (May 2007) p. 4.

SCP Indirect Impacts. Implementation of the proposed SCP would indirectly facilitate development on the Specific Plan site, and within portions of the VCC and Entrada planning areas. Impacts of the Specific Plan development on solid waste disposal services are discussed above. Impacts associated with the development of the VCC and Entrada planning areas are described below.

Site preparation (vegetation removal and grading activities) and construction activities required to develop portions of the VCC and Entrada planning areas would generate a total of approximately 38,781 tons of construction waste.[22] As discussed above, the proposed Project would be required to comply with title 20, chapter 20.87 of the Los Angles County Municipal Code. Assuming a 50 percent diversion/ recycling rate, development of portions of the VCC and Entrada planning areas would result in the generation of approximately 19,390 tons of construction waste. These waste materials are expected to consist of typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green waste.

Approximately 3.4 million square feet of new nonresidential development would be facilitated within the VCC planning area. Following build-out of the VCC planning area, this development would generate approximately 46,027 pounds of solid waste per day, or 8,400 tons per year as shown in **Table 4.20-4**.

Table 4.20-4
Projected Daily VCC and Entrada Planning Areas Solid Waste Generation (No Recycling)

Land Use	Quantity/Units	Generation Rates (pounds/day)[1]	Total Waste Generation (pounds/day)	Total Waste Generation (tons/year)
VCC Planning Area				
Commercial [2]	3,400,000 sf	0.01	46,027	8,400
Entrada Planning Area				
Single-Family Detached	1,724 du	11.18	19,271	3,517
Commercial	450,000 sf	0.01	5,918	1,080
Subtotal			25,189	4,597
Total			**71,216**	**12,997**

du = dwelling unit, sq. ft. = square feet.

[1] The solid waste generation rates are derived from the Ventura County Solid Waste Management Department's Guidelines for the Preparation of Environmental Assessments for Solid Waste Impacts. The Los Angeles County solid waste generation factor of 11 pounds/capita/day was not used in this analysis because it is overly general and may not yield an accurate solid waste generation assessment for the proposed Project. The factors utilized do not reflect an adjustment for recycling activities.

[2] The commercial uses for the VCC and Entrada planning areas would include both retail and office uses. The retail generation rate was utilized in this analysis because it is a higher generation rate than commercial uses (0.0024 tons per year for retail and 0.0014 tons per year for commercial) and, therefore, overstates the amount of waste to be generated.

Source: Impact Sciences, Inc. (February 2008).

[22] Assumes a generation rate of 90 tons of construction waste per acre. The VCC planning area's gross acreage for approved land uses is 178.5 acres, not including open space and the Entrada planning area's gross acreage for proposed land uses is 252.4, not including open space, with a combined acreage of 430.9 (430.9 X 90 = 38,781). Please refer to Section 3.0, Project Description of the Newhall Ranch Specific Plan Program EIR.

Implementation of the proposed SCP also would facilitate the development of approximately 1,724 residential dwelling units and approximately 450,000 square feet of commercial development in a portion of the Entrada planning area. Solid waste generation associated with this development would generate approximately 25,189 pounds of solid waste per day, or approximately 4,597 tons per year. Total solid waste generation for both developments would be 71,216 pounds per day and 12,997 tons per year as shown in **Table 4.20-4**.

These solid waste generation estimates assume no landfill disposal reduction by recycling activities. However, the uses within these planning areas would be required to provide adequate areas for collecting and loading recyclable materials in accordance with the County's Model Ordinance. This recycling, implemented in concert with the Countywide efforts and programs, would substantially reduce the volume of solid waste entering landfills generated by the land uses facilitated within the VCC and Entrada planning areas.

However, as previously discussed, because Los Angeles County has not identified an adequate supply of landfill space beyond 2020, for the purposes of this analysis, the project-generated increase in solid waste disposal at landfills and other waste disposal facilities within Los Angeles County is considered significant under Significance Criterion 1.

Unless solid waste is managed in accordance with federal, state, and local laws and regulations, waste generated by facilitated development of the VCC and Entrada planning areas would result in a significant indirect impact under Significance Criterion 2. Implementation of Mitigation Measure VCC-SWS-1 for the VCC planning area would reduce this impact to a less-than-significant level. The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Significance Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada area would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

Commercial and industrial uses developed at VCC may generate a variety of hazardous wastes. The incremental increase in hazardous waste generation that may be caused by uses developed at VCC would not require a substantial amount of disposal capacity at existing hazardous waste treatment and disposal facilities, and not result in a significant impact under Significance Criteria 1 or 2.

4.20.6.2.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the RMDP would not facilitate new development located beyond the Specific Plan area boundary. The RMDP would not result in solid waste impacts to

any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the RMDP would not result in any additional secondary solid waste management impacts.

SCP Secondary Impacts. Implementation of the SCP would not facilitate new development located beyond the boundary of the Specific Plan, the VCC planning area, and the Entrada planning area. The SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-5 summarizes the solid waste disposal impacts that would occur as a result of the direct, indirect, and secondary impacts of Alternative 2 after the implementation of proposed mitigation measures.

Table 4.20-5
Alternative 2 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Significance Criterion 1**	**Significance Criterion 2**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.6.3 Impacts of Alternative 3 (Elimination of Planned Potrero Bridge and Additional Spineflower Preserves)

4.20.6.3.1 Direct Impacts

RMDP Direct Impacts. The RMDP component of Alternative 3 would reduce the amount of infrastructure developed on the Specific Plan site, with a corresponding decrease in facilitated residential and commercial development. (Additional information describing the characteristics of Alternative 3 is provided in **Section 3.0**, Description of Alternatives, of this EIS/EIR.) As less infrastructure would be installed, construction-related solid waste impacts associated with this alternative would be less than those associated with Alternative 2. Nonetheless, solid waste generated during construction of the infrastructure (*e.g.*, ground and vegetation litter, and construction debris) would result in solid waste material entering the local landfill. This is considered a significant direct impact under Significance Criterion 1 because, while area landfills can accommodate Alternative 3's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent. (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste.*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative 3 would result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The SCP component of Alternative 3 would dedicate 221.8 acres of privately owned land, within the Specific Plan area and Entrada planning area, to CDFG as spineflower preserves, representing a 53-acre increase when compared to the proposed Project. Implementation of the SCP under this alternative would not result in the demand for solid waste services at the local landfills that serve the Project area. Therefore, implementation of the SCP under Alternative 3 would not result in direct impacts under Significance Criteria 1 or 2.

4.20.6.3.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 3 would facilitate partial build-out of the Specific Plan. However, the Specific Plan development facilitated by Alternative 3 would be slightly reduced as compared to the development facilitated by the proposed Project. Alternative 3 would reduce solid waste generation estimated for Alternative 2 by 922 tons per year, or 5,052 pounds per day under operational conditions.[23] Additionally, the amount of solid waste generated during construction would be reduced since fewer dwelling units and less commercial area would be constructed under this alternative. However, as with Alternative 2, because Los Angeles County has not identified an adequate supply of landfill space beyond 2020, solid waste generated by the Specific Plan build-out facilitated by Alternative 3 is expected to result in a significant indirect impact under Significance Criterion 1 because the solid waste impacts would necessarily occur beyond the County's 2020 planning horizon.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation from the Specific Plan site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

SCP Indirect Impacts. Implementation of the SCP component of Alternative 3 would indirectly facilitate development on the Specific Plan site, and on portions of the VCC and Entrada planning areas. Impacts of Specific Plan build-out on solid waste facilities are discussed above.

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[23] The Single-Family Detached generation rate was utilized in this analysis because it is a higher generation rate than Multi-Family or Attached (2.0400 tons per year for Single-Family and 1.1700 tons per year for commercial; 11.18 pounds per day for Single-Family and 6.41 pounds per day for Multi-Family). ~~and, t~~Therefore, while this approach overstates the amount of waste to be generated, it represents a conservative methodology for purposes of the environmental analysis.

The amount of development on the VCC planning area facilitated by Alternative 3 would be identical to the amount of development facilitated by Alternative 2. Accordingly, as discussed in **Subsection 4.20.6.2.2**, build-out of the VCC planning area would result in the demand for additional landfill capacity; this is considered a significant indirect impact under Significance Criterion 1.

Implementation of Alternative 3 would facilitate the development of approximately 1,125 residential units and approximately 450,000 square feet of commercial development on the Entrada planning area, which is less than that facilitated by Alternative 2. Accordingly, this alternative would generate approximately 1,224 tons per year or 6,707 pounds per day less solid waste than Alternative 2.[24] Nonetheless, solid waste generation would result in a significant indirect impact under Significance Criterion 1 due to the County's inability to identify an adequate supply of landfill space beyond 2020.

Unless solid waste is managed in accordance with federal, state, and local laws and regulations, waste generated by build-out facilitated by Alternative 3 on the VCC and Entrada planning areas would result in a significant indirect impact under Significance Criterion 2. Implementation of Mitigation Measure VCC-SWS-1 for the VCC planning area would reduce this impact to a less-than-significant level. The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada area would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

Commercial and industrial developed at VCC may generate a variety of hazardous wastes. The incremental increase in hazardous waste generation that may be caused by uses developed at VCC would not require a substantial amount of disposal capacity at existing hazardous waste treatment and disposal facilities, and not result in a significant impact under Significance Criteria 1 or 2.

4.20.6.3.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the Alternative 3 RMDP would not facilitate new development located beyond the Specific Plan area boundary. The RMDP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the Alternative 3 RMDP would not result in any additional secondary solid waste management impacts.

[24] See, *supra*, footnote 23.

SCP Secondary Impacts. Implementation of the Alternative 3 SCP would not facilitate new development located beyond the boundary of the Specific Plan, the VCC planning area, and the Entrada planning area. The Alternative 3 SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-6 summarizes the solid waste disposal impacts expected to occur as a result of the direct, indirect, and secondary impacts of Alternative 3 after implementation of proposed mitigation measures.

Table 4.20-6
Alternative 3 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Landfill Capacity**	**Compliance with Solid Waste Regulations**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.6.4 Impacts of Alternative 4 (Elimination of Planned Potrero Bridge and Addition of VCC Spineflower Preserve)

4.20.6.4.1 Direct Impacts

RMDP Direct Impacts. The RMDP component of Alternative 4 would reduce the amount of infrastructure developed on the Specific Plan site, when compared to the proposed Project (Alternative 2), with a corresponding decrease in facilitated residential and commercial development. (Additional information describing the characteristics of Alternative 4 is provided in **Section 3.0**, Description of Alternatives, of this EIS/EIR.) As less infrastructure would be installed, construction-related solid waste generation impacts associated with this alternative would be less than those associated with Alternative 2. Nonetheless, solid waste generated during construction of the infrastructure (*e.g.*, ground and vegetation litter, and construction debris) would result in solid waste material entering the local landfill. This is considered a significant direct impact under Significance Criterion 1 because, while area landfills can accommodate Alternative 4's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent: (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative

4 would result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The SCP component of Alternative 4 would dedicate approximately 259.9 acres of privately owned land, within the Specific Plan area and VCC and Entrada planning areas, to CDFG as spineflower preserves, representing a 92-acre increase when compared to Alternative 2. Under this alternative, unlike Alternatives 2 through 3, a spineflower preserve would be established in the VCC planning area. Implementation of the SCP under this alternative would not result in the demand for solid waste services at the local landfills that serve the Project area. Therefore, implementation of the SCP under Alternative 4 would not result in direct impacts under Significance Criteria 1 and 2.

4.20.6.4.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 4 would facilitate partial build-out of the Specific Plan. However, the Specific Plan development facilitated by Alternative 4 would be slightly reduced, as compared to the development facilitated by the proposed Project. Alternative 4 would reduce solid waste generation estimated for Alternative 2 by 335 tons per year or 1,833 pounds per day under operational conditions.[25] Additionally, the amount of solid waste generated during construction would be reduced, since fewer dwelling units and less commercial area would be constructed under this alternative. However, as with Alternative 2, because Los Angeles County has not identified an adequate supply of landfill space beyond 2020, solid waste generated by the Specific Plan build-out facilitated by Alternative 4 is expected to result in a significant indirect impact under Significance Criterion 1 because the solid waste impacts would necessarily occur beyond the County's 2020 planning horizon.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation from the Specific Plan site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 or 2.

SCP Indirect Impacts. Implementation of the SCP component of Alternative 4 would indirectly facilitate development on the Specific Plan site, and on a portion of the Entrada planning area. Indirect impacts resulting from build-out of the Specific Plan are evaluated in the section above. Implementation of Alternative 4 would preclude build-out of the VCC planning area because the establishment of a spineflower preserve on the VCC planning area would make the grading required to develop the remainder of the VCC planning area infeasible.

[25] See, *supra*, footnote 23.

Implementation of Alternative 4 would facilitate the development of approximately 1,125 residential units and approximately 450,000 square feet of commercial development on the Entrada planning area. This alternative would generate approximately 1,224 tons per year or 6,707 pounds per day less solid waste than Alternative 2.[26] However, as with Alternative 2, solid waste generation would result in a significant indirect impact under Significance Criterion 1 due to the County's inability to identify an adequate supply of landfill space beyond 2020.

As for Significance Criterion 2, unless solid waste is managed in accordance with federal, state and local laws and regulations, waste generated by build-out of the Entrada planning area facilitated by Alternative 4 would result in a significant indirect impact. The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

4.20.6.4.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the Alternative 4 RMDP would not facilitate new development located beyond the Specific Plan area boundary. The RMDP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the RMDP would not result in any additional secondary solid waste management impacts.

SCP Secondary Impacts. Implementation of the Alternative 4 SCP would not facilitate new development located beyond the boundary of the Specific Plan or the Entrada planning area. The Alternative 4 SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-7 summarizes the solid waste disposal impacts that will occur as a result of the direct, indirect, and secondary impacts of Alternative 4 after the implementation of proposed mitigation measures.

[26] See, *supra*, footnote 23.

Table 4.20-7
Alternative 4 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Landfill Capacity**	**Compliance with Solid Waste Regulations**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.6.5 Impacts of Alternative 5 (Widen Tributary Drainages and Addition of VCC Spineflower Preserve)

4.20.6.5.1 Direct Impacts

RMDP Direct Impacts. The RMDP component of Alternative 5 would reduce the amount of infrastructure developed on the Specific Plan site, with a corresponding decrease in facilitated residential and commercial development, as compared with the proposed Project. (Additional information describing the characteristics of Alternative 5 is provided in **Section 3.0**, Description of Alternatives, of this EIS/EIR.) As less infrastructure would be installed, construction-related solid waste generation impacts associated with this alternative would be less than those associated with Alternative 2. Nonetheless, solid waste generated during construction (*e.g.*, ground and vegetation litter, and construction debris) would result in solid waste material entering the local landfill. This is considered a significant direct impact under Significance Criterion 1 because, while area landfills can accommodate Alternative 5's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative 5 would result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The SCP component of Alternative 5 would dedicate approximately 338.6 acres of privately owned land to CDFG as spineflower preserves, representing an approximate 170-acre increase when compared to the proposed Project. Under this alternative, spineflower preserves would be established in the Specific Plan area, and the VCC and Entrada planning areas. Implementation of the SCP under this alternative would not result in the demand for solid waste services at the local landfills

that serve the Project area. Therefore, implementation of the SCP under Alternative 5 would not result in direct impacts under Significance Criteria 1 or 2.

4.20.6.5.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 5 would facilitate partial build-out of the Specific Plan. However, the Specific Plan development facilitated by Alternative 5 would be slightly reduced, as compared to the development facilitated by the proposed Project. Alternative 5 would reduce solid waste generation estimated for Alternative 2 by 1,406 tons per year or 7,702 pounds per day under operational conditions.[27] Additionally, the amount of solid waste generated during construction would be reduced, since fewer dwelling units and less commercial area would be constructed under this alternative. However, as with Alternative 2, because Los Angeles County has not identified an adequate supply of landfill space beyond 2020, solid waste generated by the Specific Plan build-out facilitated by Alternative 5 is expected to result in a significant indirect under Significance Criterion 1 because the solid waste impacts would necessarily occur beyond the County's 2020 planning horizon.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation from the Specific Plan site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

SCP Indirect Impacts. Implementation of the SCP component of Alternative 5 would indirectly facilitate development on the Specific Plan site, and on a portion of the Entrada planning area. Impacts of Specific Plan build-out on solid waste facilities are discussed above. Implementation of Alternative 5 would preclude build-out of the VCC planning area because the establishment of a spineflower preserve on the VCC planning area would make the grading required to develop the remainder of the VCC planning area infeasible.

Implementation of Alternative 5 would facilitate the development of approximately 959 residential units and approximately 450,000 square feet of commercial development on the Entrada planning area. This alternative would generate approximately 1,561 tons per year or 8,551 pounds per day less solid waste than Alternative 2.[28] Nonetheless, as with Alternative 2, solid waste generation would result in a significant indirect impact under Significance Criterion 1 due to the County's inability to identify an adequate supply of landfill space beyond 2020.

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27 See, *supra*, footnote 23.

28 See, *supra*, footnote 23.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by build-out on the Entrada planning area would result in a significant indirect impact. The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

4.20.6.5.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the Alternative 5 RMDP would not facilitate new development located beyond the Specific Plan area boundary. The RMDP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the RMDP would not result in any additional secondary solid waste management impacts.

SCP Secondary Impacts. Implementation of the Alternative 5 SCP would not facilitate new development located beyond the boundary of the Specific Plan or Entrada planning area. The Alternative 5 SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-8 summarizes the solid waste disposal impacts that would occur as a result of the direct, indirect, and secondary impacts of Alternative 5 after the implementation of proposed mitigation measures.

Table 4.20-8
Alternative 5 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Landfill Capacity**	**Compliance with Solid Waste Regulations**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.6.6 Impacts of Alternative 6 (Elimination of Planned Commerce Center Drive Bridge and Maximum Spineflower Expansion/Connectivity)

4.20.6.6.1 Direct Impacts

RMDP Direct Impacts. The RMDP component of Alternative 6 would reduce the amount of infrastructure developed on the Specific Plan site, with a corresponding decrease in facilitated residential and commercial development, as compared to the proposed Project. (Additional information describing the characteristics of Alternative 6 is provided in **Section 3.0** of this EIS/EIR.) As less infrastructure would be installed, construction-related solid waste generation impacts associated with this alternative would be less than those associated with Alternative 2. Nonetheless solid waste generated during construction (*e.g.*, ground and vegetation litter, and construction debris) would result in solid waste material entering the local landfill. This is considered a significant direct impact under Significance Criterion 1 because, while area landfills can accommodate Alternative 6's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative 6 would result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The SCP component of Alternative 6 would dedicate approximately 891.2 acres of privately owned land to CDFG as spineflower preserves, representing an approximate 723-acre increase when compared to the proposed Project. Under this alternative, spineflower preserves would be established in the Specific Plan area, and the VCC and Entrada planning areas. Implementation of the SCP under this alternative would not result in the demand for solid waste services at the local landfills that serve the Project area. Therefore, implementation of the SCP under Alternative 6 would not result in direct impacts under Significance Criteria 1 or 2.

4.20.6.6.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 6 would facilitate partial build-out of the Specific Plan. However, the Specific Plan development facilitated by Alternative 6 would be slightly reduced as compared to development facilitated by the proposed Project. Alternative 6 would reduce solid waste generation estimated for Alternative 2 by 2,240 tons per year or 12,274 pounds per day under operational conditions.[29] Additionally, the amount of solid waste generated during construction would be reduced, since fewer dwelling units and less commercial area would be constructed under this alternative. However, as with Alternative 2, because Los Angeles County has not identified an adequate supply of

[29] See, *supra*, footnote 23.

landfill space beyond 2020, solid waste generated by Specific Plan build-out facilitated by Alternative 6 is expected to result in a significant indirect impact under Significance Criterion 1 because the solid waste impacts would necessarily occur beyond the County's 2020 planning horizon.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation from the Specific Plan site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

SCP Indirect Impacts. Implementation of the SCP component of Alternative 6 would indirectly facilitate developments on the Specific Plan site and the Entrada planning area. Impacts of Specific Plan build-out on solid waste facilities are discussed above. Implementation of Alternative 6 would preclude build-out of the VCC planning area because the establishment of a spineflower preserve on the VCC planning area would make grading required to develop the remainder of the VCC planning area infeasible.

Implementation of Alternative 6 would facilitate the development of approximately 425 residential units and approximately 450,000 square feet of commercial development on the Entrada planning area. This alternative would generate approximately 2,650 tons per year or 14,520 pounds per day less solid waste than Alternative 2.[30] Nonetheless, as with Alternative 2, solid waste generation would result in a significant indirect impact under Significance Criterion 1 due to the County's inability to identify an adequate supply of landfill space beyond 2020.

Unless solid waste is managed in accordance with federal, state, and local laws and regulations, waste generated by build-out facilitated by Alternative 6 on the Entrada planning area would result in a significant indirect impact under Significance Criterion 2. The County has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

[30] See, *supra*, footnote 23.

4.20.6.6.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the Alternative 6 RMDP would not facilitate new development located beyond the Specific Plan area boundary. The RMDP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the Alternative 6 RMDP would not result in any additional secondary solid waste management impacts.

SCP Secondary Impacts. Implementation of the Alternative 6 SCP would not facilitate new development located beyond the boundary of the Specific Plan or the Entrada planning area. The Alternative 6 SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-9 summarizes the solid waste disposal impacts that would occur as a result of the direct, indirect, and secondary impacts of Alternative 6 after the implementation of proposed mitigation measures.

Table 4.20-9
Alternative 6 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Landfill Capacity**	**Compliance with Solid Waste Regulations**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.6.7 Impacts of Alternative 7 (Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower)

4.20.6.7.1 Direct Impacts

RMDP Direct Impacts. The RMDP component of Alternative 7 would reduce the amount of infrastructure developed on the Specific Plan site, with a corresponding decrease in facilitated residential and commercial development, as compared to the proposed Project. (Additional information describing the characteristics of Alternative 7 is provided in **Section 3.0** of this EIS/EIR.) As less infrastructure would be installed, construction-related solid waste generation impacts associated with this alternative would be less than those associated with Alternative 2. Nonetheless solid waste generated during construction (*e.g.*, ground and vegetation litter, and construction debris) would result in solid waste material entering the local landfill. This is considered a significant direct impact under Significance Criterion 1 because, while area landfills can accommodate Alternative 7's solid waste disposal, the County may experience capacity shortfalls at landfills under long-term scenarios absent steps to increase

capacity at landfills over the long term. Thus, even with implementation of Mitigation Measure SWS-1, which requires that construction and demolition waste disposal be reduced by at least 50 percent. (*Mitigation Measures SP-4.15-1 through SP-4.15-5 do not pertain to construction waste.*), project impacts are considered significant and unavoidable under Significance Criterion 1.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. Thus, waste generated by installation of the RMDP infrastructure under Alternative 7 would result in a significant direct impact. Nonetheless, Mitigation Measure SWS-1 is recommended to ensure that impacts remain less than significant.

SCP Direct Impacts. The SCP component of Alternative 7 would dedicate approximately 660.6 acres of privately owned land to CDFG as spineflower preserves, representing an approximate 440-acre increase when compared to the proposed Project. Under this alternative, spineflower preserves would be established in the Specific Plan area, and the VCC and Entrada planning areas. Implementation of the SCP under this alternative would not result in the demand for solid waste services at the local landfills that serve the Project area. Therefore, implementation of the SCP under Alternative 7 would not result in direct impacts under Significance Criteria 1 or 2.

4.20.6.7.2 Indirect Impacts

RMDP Indirect Impacts. Alternative 7 would facilitate partial build-out of the Specific Plan. However, the Specific Plan development facilitated by Alternative 7 would be reduced slightly as compared to the development facilitated by the proposed Project. Alternative 7 would reduce solid waste generation estimated for Alternative 2 by 9,005 tons per year or 49,340 pounds per day under operational conditions.[31] Additionally, the amount of solid waste generated during construction would be reduced, since fewer dwelling units and less commercial area would be constructed under this alternative. However, as with Alternative 2, because Los Angeles County has not identified an adequate supply of landfill space beyond 2020, solid waste generated by the Specific Plan build-out facilitated by Alternative 7 is expected to result in a significant indirect impact under Significance Criterion 1 because the solid waste impacts would necessarily occur beyond the County's 2020 planning horizon.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by Specific Plan build-out would result in a significant indirect impact. Implementation of Mitigation Measures SP-4.15-1 through SP-4.15-4 and SP-4.15-5 would reduce solid waste disposal impacts under Significance Criterion 2 to a less-than-significant level.

Hazardous material use and waste generation from the Specific Plan site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

[31] See, *supra*, footnote 23.

SCP Indirect Impacts. Implementation of the SCP component of Alternative 7 would indirectly facilitate development within the Specific Plan site, and on a portion of the Entrada planning area. Impacts of Specific Plan build-out on solid waste facilities are discussed above. Implementation of Alternative 7 would preclude build-out of the VCC planning area because the establishment of a spineflower preserve on the VCC planning area would make the grading required to develop the remainder of the VCC planning area infeasible.

Implementation of Alternative 7 would facilitate development of approximately 852 residential units and approximately 51,000 square feet of commercial development on a three-acre portion of the 284-acre Entrada planning area. This alternative would generate approximately 1,860 tons per day or 10,194 pounds per day less solid waste than Alternative 2. Nonetheless, as with Alternative 2, solid waste generation would result in a significant indirect impact under Significance Criterion 1 due to the County's inability to identify an adequate supply of landfill space beyond 2020.

As for Significance Criterion 2, solid waste will be managed in accordance with federal, state, and local laws and regulations. However, waste generated by build-out on the Entrada planning area facilitated by Alternative 7 would result in a significant indirect impact. The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the Entrada planning area would comply with applicable waste management regulations, and, thus, impacts under Criterion 2 would be reduced to a less-than-significant level.

Hazardous material use and waste generation from the Entrada site would generally consist of household-type wastes. Existing programs for the collection and management of these types of wastes would be adequate to prevent significant hazardous waste disposal impacts under Significance Criteria 1 and 2.

4.20.6.7.3 Secondary Impacts

RMDP Secondary Impacts. Implementation of the Alternative 7 RMDP would not facilitate new development located beyond the Specific Plan area boundary. Therefore, the RMDP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. The RMDP would not result in any additional secondary solid waste management impacts.

SCP Secondary Impacts. Implementation of the Alternative 7 SCP would not facilitate new development located beyond the boundary of the Specific Plan or the Entrada planning area. The Alternative 7 SCP would not result in solid waste impacts to any off-site location not previously addressed by the analysis of direct and indirect impacts provided above. Therefore, the SCP would not result in any additional secondary solid waste management impacts.

Table 4.20-10 summarizes the solid waste disposal impacts that would occur as a result of the direct, indirect, and secondary impacts of Alternative 7 after the implementation of proposed mitigation measures.

Table 4.20-10
Alternative 7 Direct/Indirect/Secondary Impacts

Significance of Solid Waste Disposal Impacts		
Type of Impact	**Landfill Capacity**	**Compliance with Solid Waste Regulations**
Direct	Significant	Less than Significant
Indirect	Significant	Less than Significant
Secondary	No Secondary Impacts	No Secondary Impacts

4.20.7 MITIGATION MEASURES

4.20.7.1 Mitigation Measures Already Required by the Adopted Newhall Ranch Specific Plan EIR

The County of Los Angeles already has imposed solid waste disposal mitigation measures as part of the adoption of the Newhall Ranch Specific Plan (SP-4.15-1 through SP-4.15-4) and the Newhall Ranch WRP (**SP-5.0-59**). These measures are found in the previously certified Newhall Ranch Specific Plan Program EIR and the adopted Mitigation Monitoring Plans for the Specific Plan and WRP (May 2003), and are listed in **Table 4.20-1**, above. In addition, these mitigation measures are provided below and preceded by "SP," which stands for Specific Plan.

Specific Plan

SP-4.15-1 Each future subdivision which allows construction within the Newhall Ranch Specific Plan shall meet the requirements of all applicable solid waste diversion, storage, and disposal regulations that are in effect at the time of subdivision review. Current applicable regulations include recycling areas that are:

- compatible with nearby structures;
- secured and protected against adverse environmental conditions;
- clearly marked, and adequate in capacity, number and distribution;
- in conformance with local building code requirements for garbage collection access and clearance;
- designed, placed and maintained to protect adjacent developments and transportation corridors from adverse impacts, such as noise, odors, vectors, or glare;
- in compliance with federal, state, or local laws relating to fire, building, access, transportation, circulation, or safety; and
- convenient for persons who deposit, collect, and load the materials.

SP- 4.15-2 Future multi-family, commercial, and industrial projects within the Specific Plan shall provide accessible and convenient areas for collecting and loading recyclable materials. These areas are to be clearly marked and adequate in capacity, number, and distribution to serve the development.

SP-4.15-3 The first purchaser of each residential unit within the Specific Plan shall be given educational or instructional materials which will describe what constitutes recyclable and hazardous materials, how to separate recyclable and hazardous materials, how to avoid the use of hazardous materials, and what procedures exist to collect such materials.

SP-4.15-4 The applicant of all subdivision maps which allow construction within the Specific Plan shall comply with all applicable future state and Los Angeles County regulations and procedures for the use, collection, and disposal of solid and hazardous wastes.

Newhall Ranch WRP

SP-5.0-59 The operators of the WRP shall ensure that all solid waste diversion, storage, and disposal requirements that are in effect at the time the WRP is constructed, including AB 939 and all others, will be implemented so that the waste generated by the WRP will not impede the County's waste reduction and diversion requirements during construction and operation.

4.20.7.2 Mitigation Measures Already Required by the Adopted VCC EIR

The County of Los Angeles also adopted a solid waste-related mitigation measure as part of its approval of the VCC project. This measure is found in the previously certified VCC EIR (April 1990) and summarized above in **Table 4.20-2**, above. In addition, the mitigation measure is set forth in full below, and preceded by "VCC-SWS," which stands for Valencia Commerce Center-Solid Waste Services.

At the time of adoption, the VCC mitigation measure represented the best available mitigation imposed by Los Angeles County. Moreover, as noted in **Subsection 4.20.1.2.1**, above, additional environmental review will be conducted by Los Angeles County with respect to the VCC planning area, because the applicant recently submitted the last tentative parcel map for build-out of the VCC planning area. Finally, implementation of the previously adopted, applicable VCC mitigation measure and additional mitigation requirements (*i.e.*, measures similar to those identified in **Subsections 4.20.7.1** and **4.20.7.4**) would ensure that significant impacts to solid waste services within the VCC planning area would be reduced to the extent feasible.

VCC-SWS-1 Existing law requires a 25 percent reduction in the amount of solid waste going to landfills by 1995 and a 50 percent reduction by the year 2000. The users of the VCC will be required to comply with recycling programs. The County is currently researching and developing waste reduction/resource recovery/recycling programs. When said programs are finalized, their implementation will result in a proportionate extension of the lifespan of the state's landfills.

4.20.7.3 Mitigation Measures Relating to the Entrada Planning Area

The County of Los Angeles has not yet prepared or released an EIR for the proposed development within the portion of the Entrada planning area that would be facilitated by approval of the SCP component of the proposed Project. As a result, there are no previously adopted mitigation measures for the Entrada planning area. However, the adoption and implementation of mitigation measures similar to those set forth in **Subsections 4.20.7.1** and **4.20.7.4** would ensure that the impacts to solid waste disposal within the Entrada planning area would be reduced to the extent feasible.

4.20.7.4 Additional Mitigation Measures Proposed by this EIS/EIR

The following project-specific mitigation measure is recommended to further mitigate the significant solid waste disposal impacts that would occur with implementation of the proposed Project and the alternatives. This mitigation measure is in addition to those adopted by the Los Angeles County in connection with its approval of the Newhall Ranch Specific Plan and VCC project. The additional measure is preceded by "SWS," which stands for Solid Waste Services.

SWS-1 Prior to the issuance of grading permits, the project applicant shall prepare a Waste Management Plan pursuant to Los Angeles County Code, title 20, chapter 20.87, Construction and Demolition Debris Recycling. The Waste Management Plan shall include provisions for the recycling of a minimum of 50 percent of the construction and demolition debris, and the submittal of corresponding reports to the Los Angeles County Environmental Programs Division.

4.20.8 SUMMARY OF SIGNIFICANCE FINDINGS

Using the significance criteria identified above, it has been determined that the proposed Project and alternatives would result in significant and unavoidable impacts under Significance Criterion 1 (landfill capacity). However, application of the mitigation measures recommended in **Subsection 4.20.7** would ensure that all significant impacts of the proposed Project and alternatives under Significance Criterion 2 (regulatory compliance) would be reduced to a less-than-significant level change to correct and no further mitigation would be required. **Table 4.20-11** presents a summary of the significance criteria relating to each of the Project alternatives, and the reduced level of impact that would be achieved for each alternative by applying the above mitigation measures.

Table 4.20-11
Summary of Significant Solid Waste Services Impacts - Pre- and Post-Mitigation

Significance Criteria	Applicable Mitigation Measures	Planning Area	Impact of Alternatives - Pre/Post-Mitigation						
			Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 6	Alt 7
1. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	SP-4.15-1 through SP-4.15-4; SP-5.0-59; VCC-SWS-1; and SWS-1	NRSP	NS/NS	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU
		VCC	NS/NS	SI/SU	SI/SU	NI	NI	NI	NI
		Entrada	NS/NS	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU	SI/SU
2. Comply with federal, state, and local statutes and regulations related to solid waste.	SP-4.15-1, SP-4.15-4; SP-5.0-59; VCC-SWS-1; and SWS-1	NRSP	NS/NS	SI/M	SI/M	SI/M	SI/M	SI/M	SI/M
		VCC	NS/NS	SI/M	SI/M	NI	NI	NI	NI
		Entrada	NS/NS	SI/M	SI/M	SI/M	SI/M	SI/M	SI/M

SU = Significant unavoidable impact

SI = Significant impact

SI/M = Significant impact, but mitigated to less-than-significant level

NS = Not significant or adverse. No mitigation required.

NI = No impact, and no mitigation required

4.20.9 SIGNIFICANT UNAVOIDABLE IMPACTS

Implementation of the proposed Project and alternatives would result in significant and unavoidable impacts to landfill capacity even after the adoption of all identified feasible mitigation measures.