

## **4.9 UTILITIES AND SERVICE SYSTEMS**

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The following sections address water supply, sewage conveyance, collection and treatment, and solid waste. Information from the 2010 Urban Water Management Plan prepared by the Glendale Water and Power Department on domestic water supply is incorporated in this section. Information on sewage conveyance and treatment referred to in this section was collected from public agencies providing service to the City of Glendale. Solid waste information was collected from public agencies providing service to the City.

### ENVIRONMENTAL SETTING

#### Existing Conditions

##### *Water Supply*

The Glendale Water and Power Department provides water service for domestic, irrigation, and fire protection purposes to the City of Glendale. The City currently has three sources of water to meet demands: local groundwater, water imported from the Metropolitan Water District (MWD), and recycled water.

The City of Glendale consumed approximately 31,543 acre-feet of water during fiscal year 2012–2013.<sup>1</sup> Of this total, approximately 10,910 acre-feet, or 35 percent, was pumped from local groundwater basins; approximately 18,761 acre-feet, or 59 percent, was provided by the Metropolitan Water District (MWD); and approximately 1,873 acre-feet, or 6 percent, was supplied by the City’s water reclamation system.<sup>2,3</sup> Each of the City’s water sources is described as follows.

##### **Local Groundwater Supplies**

The City receives its groundwater supply from the San Fernando and Verdugo Groundwater Basins. The rights of the City to San Fernando and Verdugo Basin groundwater supplies are defined by the 1975 decision of the California Supreme Court in *The City of Los Angeles vs. The City of San Fernando, et al.* In addition, a 10-year agreement between the cities of Glendale, Burbank, and Los Angeles, effective October 1, 2007, also affects the parties’ pumping rights in the San Fernando Basin. In the stipulated judgment, the Court found that under “pueblo” water rights, the City of Los Angeles owns all San Fernando Basin surface and groundwater supplies, and that Glendale is entitled to an annual 21 percent “return flow credit” from the San Fernando Basin. Pueblo rights are the highest water right in California and establish a priority of usage by the City of native water. The 21 percent figure is based on the assumption that 21 percent of the water used by the City percolates into the groundwater table and ranges from 5,000 to 5,400 acre-feet per year, depending on the overall municipal use each year. This return flow credit is the City’s primary water right in the San Fernando Basin. Per this judgment, the City is also allowed to accumulate these credits if its water rights are not used.

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1 City of Glendale Water & Power, *2011-2012 Annual Report, Water Utility Operating Statistics* (2012).

2 City of Glendale Water & Power, *2010 Urban Water Management Plan (2010 UWMP)* (adopted June 2011), Table 3-2, 28.

3 An acre-foot is the amount of water that will cover 1 acre to a depth of 1 foot and equals approximately 326,000 gallons, which represents the needs of two average families in and around the home for 1 year.

In the water year starting on October 1, 2010, the City has accumulated approximately 50,861 acre-feet of unused return flow credits in the San Fernando Groundwater Basin.<sup>4</sup> Much of this accumulation was a result of the City's not being able to pump from the basin because of the groundwater contamination. Glendale also has the right to extract additional water subject to payment to the City of Los Angeles at a cost generally equivalent to the cost of MWD alternative supplies. This right to produce water in excess of the return flow credit and the accumulated credits are significant to the operation of the Glendale Water Treatment Plant, which is part of a US Environmental protection Agency (USEPA) Superfund cleanup project in the City. Significant production from the basin and delivery to Glendale has occurred since the system began operation in 2000.<sup>5</sup>

Pursuant to the 10-year agreement, Glendale, in any one year, may extract a limited portion of these accumulated stored water credits. The amount that can be extracted is determined annually by the watermaster and is based on a formula that ensures the parties' combined pumping does not cause water levels in the San Fernando Basin aquifer to drop below a defined level (-655,370 acre-feet). The agreement also provides that Los Angeles will invest in capital projects to improve the recharge of groundwater into the San Fernando Basin. The agreement further provides that the parties will agree on the scope of a study to reevaluate the amount of water that can safely be extracted without harming the San Fernando Basin. In the future, this may affect the parties' groundwater rights.

In addition to current extractions of return flow water and stored water, in any one year Glendale may extract from the San Fernando Basin an amount not to exceed 10 percent of its last annual credit for import return water, which is surface and subsurface water that leaves a field following the application of irrigation activities and is subject to an obligation to replace such over-extraction by reduced extraction during the next water year.

Water in the San Fernando Basin is currently available for municipal use. The City currently uses 7,701 acre-feet from the basin annually.<sup>6</sup> The Glendale Water Treatment Plant and eight extraction wells pump, treat, and deliver water from the basin to Glendale via its Grandview Pumping Station. The plant, with a capacity of 5,000 gallons per minute, can reliably provide a maximum of 7,800 acre-feet per year (afy) for municipal use in Glendale.<sup>7</sup>

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4 City of Glendale Water & Power, 2010 UWMP (2010)

5 US Environmental Protection Agency (USEPA), Pacific Southwest, Region 9: Superfund, "San Fernando Valley (area 2 Glendale)," [http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/San+Fernando+Valley+\(Area+2+Glendale\)?OpenDocument](http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/San+Fernando+Valley+(Area+2+Glendale)?OpenDocument).

6 City of Glendale Water & Power, 2010 UWMP (2010), Table 3-2, 28.

7 City of Glendale Water & Power, 2010 UWMP (2010), 20.

The groundwater supplies from the Verdugo Groundwater Basin also contribute to the City's water supplies. The judgment described previously also gives Glendale the right to extract 3,856 afy from this basin annually. The City currently utilizes approximately 2,100 afy from the basin. Production of water has been highly variable in the past because of water quality problems, groundwater levels, and limited extraction capacity. The Verdugo Park Water Treatment Plant and five extraction wells pump, treat, and deliver water to the City for municipal use. The existing wells and Verdugo Park Water Treatment Plant produce approximately 2,000 afy.<sup>8</sup> However, because of extraction problems, additional extraction capacity will need to be developed in order for the City to utilize its full rights to the basin.<sup>9</sup>

### **Metropolitan Water District**

For the 5 fiscal years ended June 30, 2010, Glendale received an average of approximately 21,090 afy of MWD supplies, which constituted approximately 66 percent of Glendale's total water supply. MWD supplies are delivered to Glendale through three service connections with capacities of 48, 10, and 20 cubic feet per second (cfs), respectively.<sup>10</sup>

### **Recycled Water System**

The Los Angeles/Glendale Water Reclamation Plant provides recycled water to Glendale for nonpotable uses such as irrigation. The reclamation plant has a capacity of 20 million gallons per day (gpd) and has been delivering recycled water to the City since the late 1970s. Based on a contract between the cities of Los Angeles and Glendale, Glendale is entitled to 50 percent of any effluent produced at the plant. In 2010, the City utilized approximately 1,785 afy from the reclamation plant for nonpotable uses. Treated wastewater not utilized by either Glendale or Los Angeles is discharged into the Los Angeles River. Glendale currently has a "backbone" recycled water distribution system consisting of 21 miles of mains, six pumping plants, and five storage tanks to deliver recycled water to users.<sup>11</sup>

### **Potable Water System**

Currently, 58 percent of the potable water used in the City comes from the MWD.<sup>12</sup> The main water distribution system in Glendale includes 397 miles of water mains, 28 pumping plants, and 30 reservoirs and water tanks. Together, the Glendale Water Treatment Plant and the Verdugo Park Water Treatment Plant provide treatment for up to 9 million gpd of water.<sup>13</sup> Of the approximately 31,543 acre-feet of

8 City of Glendale Water & Power, *2010 UWMP* (2010), 21.

9 City of Glendale Water & Power, *2010 UWMP* (2010).

10 City of Glendale Water & Power, *2010 UWMP* (2010), 27.

11 City of Glendale Water & Power, *2010 UWMP* (2010), 55.

12 City of Glendale Water & Power, *2011–2012 Annual Report, Water Utility Operating Statistics* (2012).

13 Glendale Water & Power, *Annual Report: 2011-2012 Water Utility Operating Statistics*, [http://www.glendalewaterandpower.com/reports/annual\\_reports.aspx](http://www.glendalewaterandpower.com/reports/annual_reports.aspx).

water consumed by users in fiscal year 2012–2013, residential customers used approximately 76 percent, commercial customers used approximately 16 percent, and industrial customers used approximately 3 percent; the remaining approximately 5 percent was used for irrigation.

The nine parcels on the Project site are currently served by several 2-inch water lines, which extend and connect to an 8-inch water main, located in Broadway.

### **Existing Water Use**

The Project site is developed with a single-story commercial retail store, a large surface parking lot, a 2-story apartment building, and a garage facing Kenilworth Avenue. **Table 4.9.1-1, Existing Water Demand**, provides an estimate of water use by existing land uses on the Project site. Total water demand generated by existing uses on the site is estimated at 1,358,056 gallons per year, or approximately 4.16 afy.

**Table 4.9.1-1  
Existing Water Demand**

<b>Use</b>	<b>Area (sq. ft.)</b>	<b>Factor</b>	<b>Daily Demand (gallons/day)</b>	<b>Annual Demand (gallons/year)</b>	<b>Annual Demand (afy)</b>
Retail store (Office Depot)	25,302	100 gpd/ 1,000 sq. ft.	2,530.20	923,523.00	2.83
Apartment building	4,770	250 gpd/ 1,000 sq. ft.	1,190.50	434,532.50	1.33
<b>Total</b>			<b>3,720.70</b>	<b>1,358,055.50</b>	<b>4.17</b>

*Source: Los Angeles Bureau of Sanitation, Sewage Loading Factors (1996).  
Note: afy = acre-feet per year; gpd = gallons per day; sq. ft. = square feet.  
125 percent sewage generation loading factor.*

## **Regulatory Setting**

### **Federal**

#### **Safe Drinking Water Act**

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation’s public drinking water supply.<sup>14</sup> Amended in 1986 and 1996, the law requires a variety of actions to protect drinking water and its sources. SDWA authorizes the USEPA to set national

<sup>14</sup> Safe Drinking Water Act, sec. 300f.

health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. The USEPA, state EPA, State agencies, and water purveyors work together to ensure that SDWA standards are met.

### **Clean Water Act**

The federal Clean Water Act (CWA), Section 401 regulates the discharges of pollutants into “waters of the US” from any point or nonpoint source.<sup>15</sup> Individual permits are issued for certain defined sources of discharge, while nonpoint source runoff from construction sites and urban development is regulated under a series of general permits. Construction that disturbs 1 acre or more is regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater program. In the State of California, the program is administered by the local Regional Water Quality Control Board (RWQCB).

### **Federal Pretreatment Regulations**

Part 403 in the Code of Federal Regulations<sup>16</sup> establishes the responsibilities of federal, State, and local government, industry, and the public in implementing National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works (POTW), or that may contaminate sewage sludge.

## ***State***

### **Title 17 Potable Water**

Potable water supplies are protected by Title 17 of State law, which controls cross-connections with potential contaminants, including nonpotable water supplies such as recycled water. Title 17 specifies the minimum backflow protection required on the potable water system for situations in which there is potential for contamination to the potable water supply.<sup>17</sup>

### **Title 20 Water Efficiency Standards**

Title 20<sup>18</sup> establishes water efficiency standards (i.e., maximum flow rates) for specific appliances including all new showerheads (2.5 gallons per minute at 80 pounds per square inch), lavatory and kitchen sink faucets (2.2 gallons per minute at 60 pounds per square inch), and commercial prerinse

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15 Clean Water Act, sec. 404.

16 Code of Federal Regulations, Protection of Environment, Part 403, “General Pretreatment Regulations for Existing and New Sources of Pollution.”

17 California Code of Regulations, Group 4, Article 2, “Protection of Water System,” Table 1.

18 California Code of Regulations, sec. 1605.1 and 1605.3, “Federal and State Standards for Federally-Regulated Appliances,” and “State Standards for Non-Federally Regulated Appliances.”

spray valves (1.2 gallons per minute at 60 pounds per square inch). Title 20 also establishes maximum water consumption standards for urinals and water closets (1.6 gallons per flush per unit for most units).

### **Title 22 Recycled Water**

Title 22<sup>19</sup> sets bacteriological water quality standards based on the expected degree of public contact with recycled water. Title 22 establishes the quality and/or treatment processes required for an effluent to be used for a specific nonpotable application. The following categories of recycled water are identified:

- Disinfected tertiary recycled water
- Disinfected secondary-2.2 recycled water<sup>20</sup>
- Disinfected secondary-23 recycled water<sup>21</sup>
- Undisinfected secondary recycled water

In addition to recycled water uses and treatment requirements, Title 22 addresses sampling and analysis requirements at the treatment plant, preparation of an engineering report prior to production or use of recycled water, general treatment design requirements, reliability requirements, and alternative methods of treatment.

### **Urban Water Management Planning Act**

The Urban Water Management Planning Act<sup>22</sup> (UWMPA) requires urban water suppliers that provide water for municipal purposes to more than 3,000 customers, or more than 3,000 acre feet of water, to prepare an Urban Water Management Plan (UWMP). The intent of the UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands.

The UWMP must include a water supply and demand assessment comparing total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that the management plans be updated every 5 years.

The most recent UWMP is the 2010 UWMP, and relevant information was incorporated by reference in this water supply evaluation. The 2010 UWMP is a revision of the 2005 UWMP, outlining the numerous changes that have occurred in the City for the last 5 years. The City has been actively developing local

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19 California Code of Regulations, Title 22, Division 4, Chapter 3, "Water Recycling Criteria."

20 The 2.2 refers to the coliform count requirement for the water – 2.2 most probable number (MPN)/100 mL.

21 The 23 refers to the coliform count requirement for the water – 23 MPN/100 mL.

22 Department of Water Resources, Urban Water Management Planning Act (commonly referred to as SB 610), California Water Code, sec. 10610–10656.

water resources and advocating the greater use of recycled water, and has also been implementing many of the Best Management Conservation Practices.

The 2010 UWMP provides a summary of water supply and demand for the City. The UWMP is also intended to be used as a tool to ensure water reliability given the existing and anticipated future demands. The City of Glendale currently has three sources of water available to meet demands, which include ground water, imported water from MWD, and recycled water. **Table 4.9.1-2, Project Water Demand by Category (af)**, illustrates the water demand forecast by land use category.

**Table 4.9.1-2**  
**Projected Water Demand by Category (af)**

Land Use	2010	2015	2020	2025	2030	2035
Single-family residential	10,165	10,703	10,752	10,802	10,852	10,903
Multifamily residential	9,620	10,130	10,177	10,224	10,271	10,319
Commercial/Institutional	3,698	3,894	3,912	3,930	3,948	3,967
Industrial	468	493	495	497	499	502
Irrigation	982	1,034	1,039	1,044	1,049	1,053
Other	1,515	2,613	2,572	2,573	2,578	2,580
<b>TOTAL</b>	<b>26,448</b>	<b>28,866</b>	<b>28,946</b>	<b>29,070</b>	<b>29,198</b>	<b>29,323</b>

Source: City of Glendale Water & Power, 2010 Urban Water Management Plan (adopted June 2011), Table 2-1.

Note: af = acre-feet.

Annual weather adjustments factors can be determined by projecting water demands and assuming long-term normal weather, and then comparing to actual demands. Adjusting for economic and drought conditions, projected water demands can vary by approximately 3 percent in any year due to average historical weather variability.<sup>23</sup> This means water demands under dry weather conditions can be as much as 3 percent higher than normal demands on average. On the other hand, water demands under wet weather conditions can be as much as 3 percent lower than normal demands on average.

### California Water Quality Control Board

The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) are the principal state agencies with primary responsibility for the coordination and control of water quality. In the Porter-Cologne Water Quality Control Act<sup>24</sup> (Porter-Cologne), the California State

23 City of Glendale Water & Power, 2010 UWMP (2010), Section 2.2, Water Demand Forecast by Weather.

24 State Water Resources Control Board, "Porter Cologne Water Quality Control Act," California Water Code, Division 7, Water Quality (effective January 1, 2008).



Legislature declared that the “state must be prepared to exercise its full power and jurisdiction to protect the quality of the waters in the state from degradation.” Porter-Cologne grants the boards authority to implement and enforce water quality laws, regulations, policies, and plans to protect the State’s groundwater and surface waters.

The Project is located within the Los Angeles Region of the California Regional Water Quality Control Board (Los Angeles RWQCB), which provides guidelines for sewage disposal from land developments. The guidelines provide an explanation of the principal statutory authority and administrative procedures under which the RWQCB will fulfill its responsibilities to protect against pollution, nuisance, contamination, unreasonable degradation of water quality, and violation of water quality objectives, as each may occur from the disposal of sewage from land developments.

### **Comprehensive Water Legislation**

In November 2009, four legislative bills (Senate Bill [SB]X7-1, SBX7-6, SBX7-7, and SBX7-8) and the supporting bond bill (SBX7-2) were approved by Governor Arnold Schwarzenegger, creating a comprehensive water package designed to meet California’s water challenges.<sup>25</sup> The legislation establishes the governmental framework to achieve the coequal goals of providing a more reliable water supply to California and restoring and enhancing the Sacramento-San Joaquin Delta ecosystem. The package includes requirements to improve the management of our water resources by monitoring groundwater basins, developing agricultural water management plans, reducing statewide per capita water consumption by 20 percent by 2020, and reporting water diversions and uses in the delta. It also appropriates \$250 million for grants and expenditures for projects to reduce dependence on the delta if the bond issue is approved by the voters in the future.

The Safe, Clean, and Reliable Drinking Water Supply Act of 2014 (SBX7-2) will come before the California voters in November 2014. This act is the product of the 2009 comprehensive legislative package crafted in 2009 to meet California’s growing water challenges. This act may be modified in the future depending on climatic conditions in California. If enacted, it would provide funding, \$10.15 billion, for California’s aging water infrastructure and for projects and programs to improve the ecosystem and water supply reliability for California. The bond bill includes \$4 billion for local resources development, \$4 billion for ecosystem restoration, and \$3 billion for public benefits associated with new surface and groundwater storage projects. These investments will help to reduce seismic risk to delta water supplies, will protect drinking water quality, and will reduce conflict between water management and environmental protection.

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25 Department of Water Resources, California Water Plan Update 2009, Volume 4 (December 2009). Reference Guide, Legislation, 2009 Comprehensive Water Package, Special Session Policy Bills and Bond Summary (November 2009).

Part of the comprehensive water package included SBX7-7, Statewide Water Conservation. This bill creates a framework for future planning and actions by urban and agricultural water suppliers to reduce California's water use. This bill requires the development of agricultural water management plans and requires urban water agencies to reduce statewide per capita water consumption 20 percent by 2020.

## **Metropolitan Water District of Southern California**

### ***Primary Source of Water***

GWP relies on MWD sales of water to meet most of its current water supply requirements. For the fiscal years ended June 30, 2013 water deliveries from the MWD was 16.8 million gpd (approximately 18,761 afy), which constituted approximately 59 percent of the GWP's total water supply. The GWP expects to continue reliance on MWD sales of water to meet most of its future water supply requirements.

### ***History and Background***

The MWD was created in 1928 by vote of the electorates of 11 Southern California cities, including the City, under authority of the Metropolitan Water District Act (California Statutes 1927, Chapter 429, as reenacted in 1969 as Chapter 209, as amended [herein referred to as the "Metropolitan Act"]). The Metropolitan Act authorizes MWD to levy property taxes within its service area; establish water rates; impose charges for water standby and service availability; incur general obligation bonded indebtedness and issue revenue bonds, notes, and short-term revenue certificates; execute contracts; and exercise the power of eminent domain to acquire property. In addition, the Metropolitan's Board of Directors ("Metropolitan's Board") is authorized to establish terms and conditions under which additional areas may be annexed to MWD's service area.

The MWD's primary purpose is to provide a supplemental supply of water for domestic and municipal uses at wholesale rates to its member public agencies. The City is one of the 26 MWD member public agencies. If additional water is available, such water may be sold for other beneficial uses. MWD serves its member agencies as a water wholesaler and has no retail customers.

MWD's charges for water sales and availability are fixed by MWD's Board and are not subject to regulation by the California Public Utilities Commission or any other State or federal agency. MWD imports water from two principal sources: Northern California via the Edmund G. Brown California Aqueduct (the "California Aqueduct") of the State Water Project owned by the State of California, and the Colorado River via the Colorado River Aqueduct owned by MWD. MWD owns and operates the Colorado River Aqueduct and has a long-term contract for water (the "State Water Contract") with the Department of Water Resources to receive water from the State Water Project.

## **State Water Project**

One of MWD's two major sources of water is the State Water Project (SWP), which is owned by the State and operated by the State Department of Water Resources (DWR). The SWP transports water from the San Francisco Bay/Sacramento-San Joaquin River Delta (Bay-Delta) south via the California Aqueduct to MWD. The total length of the California Aqueduct is approximately 444 miles.

The State Water Contract, under a 100 percent allocation, provides MWD with 1,911,500 acre-feet of water. Water received from the SWP by MWD during the 10 years from 2002 through 2011, including water from water transfer, groundwater banking, and exchange programs delivered through the California Aqueduct, varied from a low of 908,000 acre-feet in calendar year 2009 to a high of 1,800,000 acre-feet in 2004.

For calendar year 2012, DWR's initial allocation estimate to SWP contractors was 60 percent of contracted amounts. This estimate was reduced to 50 percent of contracted amounts on February 21, 2012, and adjusted upward to 60 percent of contracted amounts as of April 16, 2012. The allocation was increased again on May 23, 2012, to 65 percent of contracted amounts due to April's wetter-than-usual weather. For MWD, the increased 2012 allocation provided 1,242,475 acre-feet, or 65 percent of its 1,911,500 acre-foot contractual amount. In addition, MWD began 2012 with 200,000 acre-feet of carryover supplies in the San Luis Reservoir, a joint-use facility of the SWP and federal Central Valley Project (CVP), from which water could be drawn in 2012.

For calendar year 2013, DWR's allocation to SWP contractors was 35 percent of contracted amounts, reflecting significantly below average precipitation over the entire Sierra Nevada range and well below average statewide snowpack. The 35 percent allocation provided MWD up to 669,025 acre-feet of its 1,911,500 acre-foot contractual amount. As of 2014, California is in a state-declared water drought which is further detailed below.

## ***Bay-Delta Regulatory and Planning Activities***

The California State Water Resources Control Board is responsible for setting water quality standards and administering water rights throughout the State, and its decisions can affect the availability of water to the MWD from the SWP. The California State Water Resources Control Board exercises its regulatory authority over the Bay-Delta by means of public proceedings leading to regulations and decisions. These include the Bay-Delta Water Quality Control Plan ("WQCP"), which establishes the water quality objectives and proposed flow regime of the estuary and water rights decisions, which assign responsibility for implementing the objectives of the WQCP to users throughout the system by adjusting their respective water rights. The California State Water Resources Control Board is required by law to

periodically review its WQCP to ensure that it meets the changing needs of this complex system. Since 2000, the California State Water Resources Control Board's Water Rights Decision 1641 ("D-1641") has governed the SWP's ability to export water from the Bay-Delta for delivery to MWD and other agencies receiving water from the SWP. D-1641 was challenged in a dozen lawsuits, filed primarily by Bay-Delta interests and environmental groups. D-1641 was, for the most part, affirmed by the California Courts of Appeal, and the California Supreme Court denied petitions for review of the Courts of Appeal's decision. In December 2006, the California State Water Resources Control Board adopted limited amendments to D-1641 and identified additional issues to review, which could result in future changes in water quality objectives and flows that in turn could affect exports of water by the SWP. The California State Water Resources Control Board is in the process of reviewing salinity objectives in the Bay-Delta intended to protect Bay-Delta farming, and inflow requirements upstream of the Delta to protect aquatic species. In July 2012, the governor of California and the US secretary of the interior outlined revisions and alternative proposals to the proposed Bay Delta Conservation Plan (BDCP). Subsequently, the California Natural Resources Agency released four draft chapters of the BDCP in March 2013. Most recently, on December 9, 2013, the State released an updated BDCP, along with a draft EIR/Environmental Impact Statement (EIS) for formal public review. The formal public review and comment period for the draft EIR/EIS was from December 13, 2013 through July 29, 2014. The public comment period closed on July 29, 2014. Comments received on or before July 29, 2014 will be considered in the Final Draft EIR/EIS decision-making process and published with the Final EIR/EIS.<sup>26</sup>

### ***Environmental Considerations***

The listing of several fish species as threatened or endangered under the federal and/or California Endangered Species Acts (ESA and CESA, respectively; collectively, "the ESAs") has impacted operations by the SWP and limited its flexibility.

### ***Federal ESA Litigation***

Litigation filed by several environmental interest groups (*NRDC v. Kempthorne* and *Pacific Coast Federation of Fishermen's Associations v. Gutierrez*) in the US District Court for the Eastern District of California alleged that the 2004 and 2005 biological opinions and incidental take statements inadequately analyzed impacts on listed species under the ESA.

On May 25, 2007, Federal District Judge Oliver Wanger issued a decision on summary judgment in *NRDC v. Kempthorne*, finding the US Fish and Wildlife Service's (USFWS's) biological opinion for Delta smelt to

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<sup>26</sup> Bay Delta Conservation Plan, Public Review, "Public Review Draft BDCP EIR/EIS" (2014), <http://baydeltaconservationplan.com/PublicReview/PublicReviewDraftEIR-EIS.aspx>.

be invalid. The USFWS released a new biological opinion on the impacts of the SWP and CVP on Delta smelt on December 15, 2008. The MWD, the San Luis & Delta Mendota Water Authority, the Westlands Water District, the Kern County Water Agency, the Coalition for a Sustainable Delta, and State Water Contractors (SWC; a California nonprofit corporation formed by agencies contracting with DWR for water from the SWP), the Family Farm Alliance, and the Pacific Legal Foundation on behalf of several owners of small farms in California's Central Valley filed separate lawsuits in federal district courts challenging the biological opinion, which the federal court consolidated under the caption Delta Smelt Consolidated Cases. Collectively, these agencies and organizations are referred to as "environmental interveners."

On December 14, 2010, Judge Wanger issued a decision on summary judgment finding that there were major scientific and legal flaws in the Delta smelt biological opinion. The court found that some but not all of the restrictions on project operations contained in the 2008 Delta smelt biological opinion were arbitrary, capricious, and unlawful. On May 18, 2011, Judge Wanger issued a final amended judgment directing the USFWS to complete a new draft biological opinion by October 1, 2011, and a final biological opinion with environmental documentation by December 1, 2013. Later stipulations and orders changed the October 1, 2011 due date for a draft biological opinion to December 14, 2011. A draft biological opinion was issued on December 14, 2011. The draft biological opinion deferred specification of a reasonable and prudent alternative and an incidental take statement pending completion of an EIR under the National Environmental Policy Act (NEPA). The federal defendants and environmental interveners appealed the final judgment invalidating the 2008 Delta smelt biological opinion to the US Court of Appeals for the Ninth Circuit. The SWP and CVP contractor plaintiffs, including MWD, have cross-appealed from the final judgment. Those appeals and cross-appeals are currently pending in the Ninth Circuit.

On February 25, 2011, the federal court approved a settlement agreement modifying biological opinion restrictions on Old and Middle River flows that would have otherwise applied in spring 2011. The settlement agreement expired on June 30, 2011. SWP and CVP contractors also moved to enjoin certain fall salinity requirements in the biological opinion that were set to become operable in September and October 2011. After an evidentiary hearing on the water contractors' motion in July 2011, Judge Wanger issued a decision on August 31, 2011, modifying the fall salinity-related requirements in the biological opinion. The effect of the injunction was to reduce water supply impacts from the biological opinion's fall salinity requirements. The federal defendants and the environmental interveners appealed the injunction on fall salinity requirements, but the federal defendants subsequently dismissed their appeal in October 2011. The environmental interveners' appeal to the Ninth Circuit on the fall salinity requirement injunction is pending. The SWP and CVP contractors have moved to dismiss the

environmental interveners' appeal of the fall salinity requirement on the ground that the salinity requirement for 2011 has expired and is therefore invalid.

On April 16, 2008, in *Pacific Coast Federation of Fishermen's Associations v. Gutierrez*, the court invalidated the 2004 National Marine Fisheries Service's (NMFS's) biological opinion for the salmon and other fish species that spawn in rivers flowing into the Bay-Delta. Among other things, the court found that the no-jeopardy conclusions in the biological opinion were inconsistent with some of the factual findings in the biological opinion; that the biological opinion failed to adequately address the impacts of SWP and CVP operations on critical habitat; and that the biological opinion failed to consider how climate change and global warming might affect the impacts of the projects on salmonid species.

The NMFS released a new biological opinion for salmonid species to replace the 2004 biological opinion on June 4, 2009. The 2009 salmonid species biological opinion contains additional restrictions on SWP and CVP operations. The NMFS calculated that these restrictions will reduce the amount of water the SWP and CVP combined will be able to export from the Bay-Delta by 5 to 7 percent. DWR had estimated a 10 percent average water loss under this biological opinion. Six lawsuits were filed challenging the 2009 salmon biological opinion. These various lawsuits have been brought by the San Luis & Delta Mendota Water Authority, the Westlands Water District, the Stockton East Water District, the Oakdale Irrigation District, the Kern County Water Agency, the State Water Contractors, and the Metropolitan Water District. The court consolidated the cases under the caption "Consolidated Salmon Cases."

On May 25, 2010, the court granted the plaintiffs' request for preliminary injunction in the Consolidated Salmon Cases, restraining enforcement of two requirements under the salmon biological opinion that limit exported water during the spring months based on San Joaquin River flows into the Bay-Delta and reverse flows on the Old and Middle Rivers. Hearings on motions for summary judgment in the Consolidated Salmon Cases were held on December 16, 2010. On September 20, 2011, Judge Wanger issued a decision on summary judgment, finding that the salmon biological opinion was flawed, and that some but not all of the project restrictions in the biological opinion were arbitrary and capricious. On December 12, 2011, Judge Lawrence O'Neill (who was assigned the case following Judge Wanger's retirement) issued a final judgment in the Consolidated Salmon Cases. The final judgment remands the 2009 salmon biological opinion to the NMFS and directs that a new draft salmon biological opinion be issued by October 1, 2014, and also directs that a final biological opinion be issued by February 1, 2016, after completion of an EIR under NEPA. On January 19, 2012, Judge O'Neill approved a joint stipulation of the parties specifying how to comply with one of the salmon biological opinion restrictions that applies to water project operations in April and May of 2012. In January and February 2012, the federal defendants and environmental interveners filed appeals of the final judgment in the Consolidated

Salmon Cases, and the SWP and CVP contractors filed cross-appeals. Those appeals and cross-appeals are now pending in the Ninth Circuit.

On November 13, 2009, the Center for Biological Diversity filed separate lawsuits challenging the USFWS's failure to respond to a petition to change the Delta smelt's federal status from threatened to endangered and the USFWS's denial of federal listing for the longfin smelt. On April 2, 2010, the USFWS issued a finding that uplisting the Delta smelt was warranted but precluded by the need to devote resources to higher priority matters. This "warranted but precluded" finding did not change the regulatory restrictions applicable to Delta smelt. For the longfin smelt litigation, a settlement agreement was approved on February 2, 2011. Under the agreement, the USFWS agreed to complete a range-wide status review of the longfin smelt and consider whether the Bay-Delta longfin smelt population, or any other longfin smelt population from California to Alaska, qualifies as a "distinct population" that warrants federal protection. On April 2, 2012, the USFWS issued its finding that the Bay-Delta longfin smelt population warrants protection under the ESA but is precluded from listing as a threatened or endangered species by the need to address other, higher-priority listing actions. The review identified several threats facing longfin smelt in the Bay-Delta, including reduced freshwater Bay-Delta outflows. The finding includes the determination that the Bay-Delta longfin smelt will be added to the list of candidates for ESA protection, where its status will be reviewed annually.

### ***California ESA Litigation***

In addition to the litigation under the ESA, other environmental groups sued DWR on October 4, 2006, in the Superior Court of the State of California for Alameda County, alleging that DWR was "taking" listed species without authorization under CESA. This litigation (*Watershed Enforcers, a project of the California Sportfishing Protection Alliance v. California Department of Water Resources*) requested that DWR be mandated to either cease operation of the SWP pumps, which deliver water to the California Aqueduct in a manner that results in such taking of listed species, or obtain authorization for such taking under CESA. On April 18, 2007, the Alameda County Superior Court issued its Statement of Decision finding that DWR was illegally taking listed fish through operation of the SWP export facilities. The Superior Court ordered DWR to "cease and desist from further operation" of those facilities within 60 days unless it obtained take authorization from the California Department of Fish and Game.

DWR appealed the Alameda County Superior Court's order on May 7, 2007. This appeal stayed the order pending the outcome of the appeal. The Court of Appeal stayed processing of the appeal in 2009 to allow time for DWR to obtain incidental take authorization for the Delta smelt and salmon under CESA, based on the consistency of the federal biological opinions with California ESA requirements ("Consistency Determinations"). After the California Department of Fish and Game issued the

Consistency Determinations under CESA, authorizing the incidental take of both Delta smelt and salmon, appellants DWR and SWP contractors dismissed their appeals of the Watershed Enforcers decision. The Court of Appeal subsequently issued a decision finding that DWR was a “person” under CESA and subject to its take prohibitions, which was the only issue left in the case. The State Water Contractors and Kern County Water Agency have filed suit in State courts challenging the Consistency Determinations under CESA that have been issued for both Delta smelt and salmon. Those lawsuits challenging the Consistency Determinations are pending. The parties are continuing discussions of adjustments to the incidental take authorizations in light of the summary judgment ruling in the Delta Smelt Consolidated Cases and the Consolidated Salmon Cases, discussed under the heading “Federal ESA Litigation,” discussed previously.

The California Fish and Game Commission listed the longfin smelt as a threatened species under CESA on June 25, 2009. On February 23, 2009, in anticipation of the listing action, the California Department of Fish and Game issued a California ESA section 2081 incidental take permit to DWR authorizing the incidental take of longfin smelt by the SWP. This permit authorizes continued operation of the SWP under the conditions specified in the section 2081 permit. The State Water Contractors filed suit against the California Department of Fish and Game on March 25, 2009, alleging that the export restrictions imposed by the section 2081 permit have no reasonable relationship to any harm to longfin smelt caused by SWP operations, are arbitrary and capricious, and are not supported by the best available science. The lawsuit is pending and the administrative record for the cases has been completed. The Ninth Circuit has scheduled oral arguments in this case for February 10, 2014 in San Francisco.

### ***State Water Project Operational Constraints***

DWR has altered the operations of the SWP to accommodate species of fish listed under the ESAs. These changes in project operations have adversely affected SWP deliveries. The impact on total SWP deliveries attributable to the Delta smelt and salmonid species biological opinions combined is estimated to be 1 million acre-feet in an average year, reducing SWP deliveries from approximately 3.3 million acre-feet to approximately 2.3 million acre-feet for the year under average hydrology, and are estimated to range from 0.3 million acre-feet during critically dry years to 1.3 million acre-feet in above normal water years. SWP deliveries to contractors were reduced by approximately 285,000 acre-feet of water in calendar year 2011 as a result of pumping restrictions, with 135,000 acre-feet of export reductions in January and February, and 150,000 acre-feet in the fall. Despite operational restrictions in 2011, high flows from above normal precipitation in late 2010 and early 2011 reaching the Bay-Delta resulted in above average storage levels remaining in Lake Oroville through May 2012. As of January 2014, the storage levels remaining in Lake Oroville are 36 percent of total capacity as a result of well below average precipitation and snowpack levels.



Operational constraints likely will continue until long-term solutions to the problems in the Bay-Delta are identified and implemented. The Delta Vision process, established by then governor Schwarzenegger, was aimed at identifying long-term solutions to the conflicts in the Bay-Delta, including natural resource, infrastructure, land use, and governance issues. In addition, State and federal resource agencies and various environmental and water user entities are currently engaged in the development of the Bay-Delta Conservation Plan, which is aimed at addressing ecosystem needs and securing long-term operating permits for the SWP, and includes the Delta Habitat Conservation and Conveyance Program (DHCCP) (together, the “BDCP”). The DHCCP’s current efforts consist of the preparation of the environmental documentation and preliminary engineering design for Bay-Delta water conveyance and related habitat conservation measures under the BDCP. In July 2012, Governor Jerry Brown of California and then US secretary of the interior Ken Salazar outlined revisions and alternative proposals to the proposed Bay Delta Conservation Plan (BDCP). Subsequently, the California Natural Resources Agency released four draft chapters of the BDCP in March 2013. Most recently on December 9, 2013, the State released an updated BDCP, along with a draft EIR/Environmental Impact Statement (EIS) for formal public review. The formal public review and comment period for the draft EIR/EIS was from December 13, 2013 through July 29, 2014.

Other issues, such as the decline of some fish populations in the Bay-Delta and surrounding regions and certain operational actions in the Bay-Delta, may significantly reduce MWD’s water supply from the Bay-Delta. SWP operational requirements may be further modified under new biological opinions for listed species under the ESA or by the California Department of Fish and Wildlife’s issuance of incidental take authorizations under CESA. Biological opinions or incidental take authorizations under the ESAs might further adversely affect SWP and CVP operations. Additionally, new litigation, listings of additional species, or new regulatory requirements could further adversely affect SWP operations in the future by requiring additional export reductions, releases of additional water from storage, or other operational changes impacting water supply operations. MWD has indicated that it cannot predict the ultimate outcome of any of the litigation or regulatory processes described previously, but believes they could have a materially adverse impact on the operation of the SWP pumps, MWD’s SWP supplies, and MWD’s water reserves.

### ***“Area of Origin” Litigation***

Four SWP contractors located north of the SWP’s Bay-Delta pumping plant filed litigation against DWR on July 17, 2008, asserting that since they are located in the “area of origin” of SWP water, they are entitled to receive their entire contract amount before any water is delivered to contractors south of the Bay-Delta. If the plaintiffs are successful in this litigation, SWP water available to MWD in a drought period could be reduced by approximately 25,000 afy of a multiyear drought or by as much as 40,000

acre-feet in an exceedingly dry year. MWD and 12 other SWP contractors located south of the Bay-Delta filed motions to intervene in this litigation, which were granted on February 25, 2009. In May 2012, the parties reached an agreement, in principle, that plaintiffs will dismiss the action with prejudice and agree to certain limitations on asserting area of origin arguments in the future; in return, DWR and the interveners will agree to operational changes that will increase the reliability of plaintiffs' SWP supplies at little or minimal cost to other SWP water contractors. The DWR completed and adopted a Final Initial Study/Mitigated Negative Declaration (IS/MND) in September 2013 for the SWP Allocation Settlement Agreements. The Final IS/MND, which describes the potential environmental impacts as a result of the proposed changes to SWP operations, determined there were no potentially significant impacts.

### ***Colorado River Aqueduct***

MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. Water from the Colorado River or its tributaries is also available to other users in California, as well as to users in the states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, resulting in both competition and the need for cooperation among these holders of Colorado River entitlements. The Colorado River Aqueduct, which is owned and operated by MWD, transports water from the Colorado River approximately 242 miles to its terminus at Lake Mathews in Riverside County.

Historically, MWD had been able to take full advantage of the availability of surplus water and apportioned but unused water. However, other users increased their use of water from the Colorado River beginning in 1998. Although the use of water is expected to fluctuate annually, this trend is projected to continue in the future. In addition, a severe drought in the Colorado River Basin has reduced water supplies.

MWD has taken steps to augment its share of Colorado River water through agreements with other agencies that have rights to use such water. Under a 1988 water conservation agreement between Metropolitan and the Imperial Irrigation District (IID), IID has constructed and is operating a number of conservation projects that are currently conserving approximately 100,000 afy of water.

### ***Management of California's Colorado River Water Supply***

In 2003, California had to reduce its use of Colorado River water; since that time, the State has been limited to its basic apportionment of 4.4 million afy. To maintain reliable deliveries to urban agencies, the State has implemented a number of agricultural to urban water conservation and transfer programs. Those programs included the lining of the All-American and Coachella Canals, funding water conservation measures in the Imperial Valley, and implementing a land fallowing and crop rotation

program with Palo Verde Irrigation District. Additionally, in 2007, agencies were allowed to store conserved water in Lake Mead for future use. As of 2012, MWD has more than 500,000 acre-feet of storage credits in Lake Mead.

### ***SWP Water Delivery Reliability***

In the *Draft State Water Project Delivery Reliability Report 2013*, DWR presents its method for calculating SWP delivery reliability, the factors affecting SWP delivery reliability, and the limitations to estimating future water delivery reliability. In the report, "water delivery reliability" is defined as the annual amount of water that can be expected to be delivered with a certain numeric frequency. SWP delivery reliability is calculated using CALSIM II, a computer model jointly developed by DWR and Reclamation, which simulates operation of the CVP/SWP system based on 82 years of historic data. The annual amounts of SWP water deliveries are ranked from smallest to largest, and a probability is calculated for each amount. These results are then displayed graphically as an exceedance plot and presented in tabular format.

The amount of SWP water supply delivered to the SWP Contractors in a given year depends on the demand for the supply; the amount of rainfall, snowpack, runoff, water in storage, and pumping capacity from the Delta; and legal constraints on SWP operation. According to DWR, more generally, water delivery reliability depends on three general factors: (1) the availability of water at the source, (2) regulatory restrictions on SWP Delta exports (imposed by federal biological opinions and State water quality plans), and (3) the effects of climate change.

### ***SWP Availability of Source Water***

As to the availability of source water, the factors of uncertainty include the inherent annual variable location, timing, amount, and form of precipitation in California. The second source of uncertainty is due to global climate change. Current literature suggests that global warming is likely to significantly impact the hydrological cycle, changing California's precipitation pattern and amount from that shown by the historical record. According to DWR, there is evidence that some changes have already occurred, such as an earlier beginning of snowmelt in the Sierras, an increase in water runoff as a fraction of the total runoff, and an increase in the frequency of winter flooding. More variability in rainfall—wetter at times and drier at others—would place more stress on the reliability of existing flood management and water supply systems, such as the SWP.

### ***SWP Ability to Convey Source Water***

With regard to the ability to convey source water to the desired point of availability, DWR reports that an uncertainty factor exists with respect to SWP operations because they are closely regulated by Delta

water quality standards established by the State Water Resources Control Board and set forth in D-1641. DWR also reports other factors of uncertainty resulting from the continuing, unexplained decline in many pelagic (open-water) fish species, including the Delta smelt since the early 2000s, and the legal challenges to SWP operations and ongoing planning activities related to the Delta. Other uncertainties include future sea-level rise associated with global climate change, which could increase salinity in the Delta, and the risk of interruptions in SWP diversions from the Delta because of levee failures. The referenced litigation challenges are described in more detail in the *Draft State Water Project Delivery Reliability Report 2013*.

### ***Demand for System Water***

With respect to estimating future demand for SWP water, DWR has identified a number of uncertainty factors, including population growth, water conservation, recycling efforts, other supply sources, and global climate change. In addition to the previously identified factors affecting water delivery reliability, DWR has reported other limitations and assumptions, all of which are explained in the *Draft State Water Project Delivery Reliability Report 2013*. This report has also identified the status of two large-scale plans—the Delta Plan and the Bay-Delta Conservation Plan—for the Delta as underway, with objectives related to providing a sustainable Delta over the long term. These planning efforts may propose changes to SWP operations, which in turn could affect SWP delivery reliability. According to DWR, each planning effort could affect SWP and CVP operations in the Delta, and each are explained in detail in report.

### **California Drought**

On January 17, 2014, California Governor Brown declared a drought state of emergency, and directed state officials to take all necessary actions to prepare for these drought conditions.<sup>27</sup> State agencies, led by the Department of Water Resources, are in the process of executing a statewide water conservation campaign, calling on Californians to reduce their water usage by 20 percent. On April 25, 2014, Governor Brown issued an executive order to strengthen the state’s ability to manage water and habitat in drought conditions and called on all Californians to redouble their efforts to conserve water.<sup>28</sup>

On July 15, 2014, an emergency regulation to increase conservation practices for all Californians went into effect. This regulation establishes the minimum level of activity that residents, businesses, and water suppliers must meet as the drought deepens, and will be in effect for 270 days unless extended or repealed. Larger water suppliers are required to activate their Water Shortage Contingency Plan to a

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27 Office of the Governor, “Governor Brown Declares Drought State of Emergency” (January 17, 2014), <http://gov.ca.gov/news.php?id=18368>.

28 Office of the Governor, “Governor Brown Issues Executive Order to Redouble State Drought Actions” (April 25, 2014), <http://www.ca.gov/drought/topstory/top-story-6.html>.

level where outdoor irrigation restrictions are mandatory. In communities where no water shortage contingency plan exists, the regulation requires that water suppliers either limit outdoor irrigation to twice a week or implement other comparable conservation actions. Finally, large urban water suppliers must report water use on a monthly basis to track progress beginning August 15.<sup>29</sup>

As of June 17, 2014, the statewide snowpack's water content, which normally provides about a third of the water for California's farms and cities, is at 18 percent of the average for the date. The northern Sierra snowpack, which helps fill the State's major reservoirs—currently only half full—shows just 7 percent of average water content.<sup>30</sup> Although water conservation efforts by a majority of water suppliers in California show that water use has declined statewide by 5 percent, measured water use has not yet met the 20 percent voluntary reduction of water use called for by Governor Brown.<sup>31</sup>

### **City of Glendale**

Glendale's water system is also interconnected with those of the City of Burbank and the Crescenta Valley Water District (CVWD) for short-term/emergency water service.<sup>32</sup> When the need arises, these connections can be opened to deliver water into the Glendale distribution system to supplement demands and vice versa. These should be viewed as only short-term transfer of water.

For the long term, MWD is engaged in "out-of-area" dry transfer and exchanges to improve local water supply reliability. These are discussed in MWD's *Regional 2010 UWMP* and are summarized in Chapter 3, "Implementing the Plan." Glendale does not have the basic capability to implement these types of programs; it relies on MWD to perform these activities.

The interconnection with CVWD was installed in 2004 and allows for CVWD to receive up to 5.0 cfs from Glendale. The preliminary design for an interconnection with Los Angeles has begun.

### **Glendale General Plan Policies**

Goals and policies that relate to water services are set forth by the City of Glendale in the General Plan Community Facilities Element. An analysis of the consistency of these applicable goals and policies with the proposed Project is provided in **Section 4.3, Land Use and Planning**. As discussed in **Section 4.3**, the Project does not conflict with the City's General Plan.

29 Office of the Governor, "State Water Board Approves Emergency Regulation to Ensure Agencies and State Residents Increase Water Conservation" (July 29, 2014), <http://www.ca.gov/Drought/news/story-59.html>.

30 Office of the Governor, "Year's Final Snow Survey Comes Up Dry" (May 1, 2014), <http://www.ca.gov/Drought/news/story-41.html>.

31 Office of the Governor, "Water Use Declines 5 Percent Statewide" (June 17, 2014), <http://www.ca.gov/Drought/topstory/top-story-8.html>.

32 2010 Urban Water Management Plan, (2010), Figure 3.2.

## **Glendale Water Conservation Policies**

Glendale has adopted a Mandatory Water Conservation Plan. During drought periods, or periods of mandatory water conservation and implementation of the City’s Mandatory Water Conservation Plan, penalties are imposed on customers who do not comply with the water conservation provisions.<sup>33</sup> The City’s Water Conservation Ordinance, Section 13.36 of the Glendale Municipal Code describes programs the City is implementing to reduce the demand for water. For example, this section of the Code contains a “no water waste” policy, which outlines prohibited uses of water, such as hosing of sidewalks, walkways, driveways, or parking areas. This section also prohibits landscape irrigation between 9:00 AM and 6:00 PM, limits the days of the week for landscape irrigation, imposes penalties for failure to repair leaks of any sort within 3 days, and forbids the use of water fountains without a recirculating water system.<sup>34</sup>

The City has encouraged voluntary conservation through the implementation of Phase I of the Water Conservation Ordinance, preventing wasteful water use. As noted previously, the emergency regulation, which was approved on July 15, 2014, requested that all water agencies and customers increase water conservation. Therefore, the Glendale City Council declared Phase II of the GWP Water Conservation Ordinance and water use restrictions, which became effective August 1, 2014. Phase II of the Mandatory Water Conservation Ordinance limits outside water use (e.g. watering landscapes) to three days a week, Tuesdays, Thursdays, and Saturdays for 10 minutes at each watering station.<sup>35</sup>

All commercial and industrial customers of the Public Service Department using 25,000 billing units per year (1 unit equals 748 gallons) or more must submit a quarterly water conservation plan to the City Manager’s Office and the Director of Glendale Water and Power.

The existing recycled water system is only available in limited sections of the City. Where recycled water use is feasible, the City requires its use in lieu of potable water. Service connections and extensions to areas outside of this system are subject to approval by the Director of Public Works. Recycled water facilities are required in new developments when it is determined that recycled water would be supplied in the future, regardless of whether or not the area is being served by the City’s recycled water system during new construction.

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33 City of Glendale Water and Power, The Urban Water Management Plan for the City of Glendale (Adopted 2011), Figure 3.2.

34 City of Glendale Municipal Code, sec. 13.36.060, “No Water Waste Policy.”

35 City of Glendale, Glendale Water and Power, “Glendale City Council Approves Phase II of Mandatory Water Conservation Ordinance (July 30, 2014),

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

To assist in determining whether a project would have a significant effect on the environment, the City determines a project may be deemed to have a significant impact on water supply, if it would:

- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed
- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects (issue is addressed in **Section 6.0, Effects Found Not to Be Significant**)

### Methodology

Existing and future water demand calculations were based on water use factors by land use previously used and approved by Glendale Water and Power. The water use factors were determined by assuming 125 percent of the wastewater generation rates provided by the City of Los Angeles. To demonstrate how water demand resulting from implementation of the Project would be accommodated, the evaluation was based on the conceptual development program described in **Section 3.0, Project Description**.

### Impact Analysis

**Threshold:** Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed

#### ***Construction Water Demand***

Demolition of the existing buildings, grading, and construction activities associated with the Project would require the use of water for dust control and clean-up purposes. The use of water for construction purposes would be short term in nature, and the amount would be much less than water consumption during Project operation. All applicable local, State, and federal requirements and Best Management Practices (BMPs) would be incorporated into construction of the Project. Therefore, construction activities are not considered to result in a significant impact on the existing water system or available water supplies.

#### ***Operational Water Demand***

As noted previously, residential land uses require significantly more water consumption than commercial uses. New development on the Project site would result in an increase in demand for indoor

potable uses, including landscape irrigation, maintenance, and other activities on the site. As indicated in **Table 4.9.1-3, Project Water Demand**, shows the projected water demand for the Project site..

**Table 4.9.1-3  
Project Water Demand**

Use	Size of Use	Demand Factor	Daily Demand (gpd)	Annual Demand (gallons)	Annual Demand (afy)
One-bedroom unit	117 du	150/unit <sup>1</sup>	17,550	6,405,750	19.66
Two-bedroom unit	60 du	200/unit <sup>1</sup>	12,000	4,380,000	4.93
Studio unit	3 du	100/unit <sup>1</sup>	300	109,500	0.34
Live/Work	4 du	80 gal/unit <sup>1</sup>	320	116,800	0.36
Commercial space	18,200 sq. ft.	150/1,000 sq. ft. <sup>1</sup>	2,730	54,750	0.17
Irrigation	14,910 sq. ft.	–	773.3	282,246	0.87
<i>Subtotal</i>			33,673.3	11,349,046	26.33
<i>Credit (Existing Development)</i>			3,720.7	(1,358,055.5)	(4.17)
<b>Total</b>			<b>29,952.6</b>	<b>9990990.50</b>	<b>22.16</b>

Note: du = dwelling unit; gpd = gallons per day; sq. ft. = square feet.

<sup>1</sup> 125 percent sewage generation loading factor.

This amount represents an estimated net increase of 22.16 afy for the Project site compared with existing uses. The Project would add 180 residential units to the site, which currently has 10 dwelling units in the existing residential apartment building and 18,200 square feet of commercial space.

According to the City's UWMP, water supplies in the City would remain adequate through the year 2035 to meet the demands of existing uses and projected growth, with a small surplus at that time. For this reason, the impact of the Project on the City's water supply will be less than significant.

### **Normal Weather Conditions**

Glendale has identified an adequate supply of water to meet future City demands under normal conditions. As indicated in **Table 4.9.1-4, Normal Weather Water Supply and Demand Comparison**, a surplus exists that provides a reasonable buffer of approximately 1,500 to 2,200 afy of water. Future water demand in the City is based on projected development contained in the General Plan. As discussed previously, the Project water demand was accounted for in the 2010 UWMP, except for the



additional four dwelling units. For purposes of this assessment, the demand of the Project was assumed not to have been included in this demand projection. However, even with the addition of 13.93 afy of demand generated by the Project, there is ample supply to meet remaining City demand under normal weather conditions.

**Table 4.9.1-4  
Normal Weather Water Supply and Demand Comparison**

Source	2010	2015	2020	2025	2030	2035
Supply						
San Fernando wells	7,701	7,800	7,800	7,800	7,800	7,800
Verdugo wells	2,087	3,856	3,856	3,856	3,856	3,856
MWD	16,550	17,620	17,755	17,890	18,025	18,162
Recycled water	1,662	1,662	1,662	1,662	1,662	1,662
Total supply	28,000	30,938	31,073	31,208	31,343	31,480
Demand	26,448	28,866	28,946	29,070	29,198	29,323
<b>Difference (Surplus)</b>	<b>1,552</b>	<b>2,072</b>	<b>2,127</b>	<b>2,138</b>	<b>2,145</b>	<b>2,157</b>

Source: Glendale Water & Power, 2010 Urban Water Management Plan (adopted June 2011), Tables 3-3 and 3-4.  
Note: MWD = Metropolitan Water District of Southern California.

### **Dry Weather Conditions**

**Table 4.9.1-5, Multiple Dry Year Period Water Supply and Demand Comparison**, provides a multiple-year water supply that Glendale has identified under average drought conditions. Water supply would increase during all 5 years due to additional imported supplies. If there is a need for significant demand reduction efforts, various voluntary or mandatory conservation efforts would be implemented.

**Table 4.9.1-5  
Multiple Dry Year Period Water Supply and Demand Comparison**

	2016	2017	2018	2019	2020
Supply	30,696	31,006	31,319	31,636	31,955
Demand	28,640	28,929	29,221	29,517	29,815
<b>Difference (Surplus)</b>	<b>2,056</b>	<b>2,077</b>	<b>2,098</b>	<b>2,119</b>	<b>2,141</b>

Source: Glendale Water & Water, 2010 Urban Water Management Plan (adopted June 2011), Table 3-11.

Water supplies from the San Fernando and Verdugo Basins and recycled water would remain unaffected by drought conditions. If there is a shortage in water supply from MWD, the Glendale distribution system could be affected. However, MWD's completion of the Diamond Valley Reservoir near Hemet

added to the reliability of MWD's supplies. This reservoir plus other MWD storage/banking operations would be able to meet demands reliably. MWD is also proposing contracts with its member agencies to supply water, including supply during drought conditions. These contracts will define, by agreement, the MWD's obligation to provide "firm" water supply to the City.

It is anticipated that during any multiple-year drought, the City would have sufficient water supply to meet demand. According to the 2010 UWMP, the City would use a smaller percentage of MWD water supplies in the future compared to its current use. With the City's reduction of dependency on imported MWD supplies, there would be a higher level of reliable water supplies to meet demand during drought conditions.

As indicated in **Table 4.9.1-5**, the City would continue to have adequate supply to meet citywide demand under drought conditions. Similar to normal weather conditions, even with the addition of 20.21 afy of demand generated by the Project, there is sufficient supply to meet City demand under drought conditions.

As indicated previously, even with implementation of the Project, the City would continue to have adequate supply to meet Citywide demand under normal and drought conditions.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

## Cumulative Impacts

**Threshold:** Have sufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements needed

As indicated in **Table 4.9.1-6, Water Demand of Related Projects**, development of related projects would result in a demand of approximately 1,016.56 afy. Combined with the increase of 22.16 afy generated by the Project, the cumulative amount demanded by the Project and related projects would generate an overall future water demand of approximately 1,038.72 afy.

**Table 4.9.1-6  
Water Demand of Related Projects**

<b>Use</b>	<b>Unit</b>	<b>Demand Factor<sup>1</sup></b>	<b>Daily Demand (gpd)</b>	<b>Annual Demand (gpy)</b>	<b>Annual Demand (afy)</b>
Multifamily residential	4,030	200/unit	806,000	294,190,000	902.84
Live/Work	47	100/unit	4,700	1,715,500	5.26
Commercial	337,129	100/1,000 sq. ft.	33,712.90	12,305,208.50	37.76.
Restaurant	4,599	100/1,000 sq. ft.	459.90	167,863.5	0.5
Hotel	266	162.5/room	43,225	15,777,125	48.5
Cinema/Studio	9,690	1 gallon/sq. ft.	9,690	3,536,850	10.8
Church	9,500	200/ 1,000 sq. ft.	1,900	693,500	2.1
Office	17,802	187.5/1,000 sq. ft.	3,337.9	1,218,324.3	3.7
Medical office	18,000	250/1,000 sq. ft.	4,500	1,642,500	5.0
<b>Total</b>			<b>907,525.70</b>	<b>331,246,871.4</b>	<b>1,016.56</b>

*Note: afy = acre-feet per year; gpd = gallons per day; gpy = gallons per year; sq. ft. = square feet.*

<sup>1</sup> 125 percent sewage generation loading factor.

Glendale has identified sufficient water supplies to meet the additional demands associated with the Project and through General Plan build-out, which includes related projects. According to the City's UWMP, water supplies in the City would remain adequate through the year 2035 to meet the demands of existing uses and projected growth, with a small surplus at that time. The City has identified local supplies that could be accessed to make up for any deficiency in imported (MWD) water. In addition, MWD water has been and continues to become a more reliable source through the construction of new water storage facilities and agreements with member agencies. Therefore, the cumulative impact of the Project and related projects to the water supply is less than significant, and the Project's contribution to this impact would not be cumulatively considerable.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

### ENVIRONMENTAL SETTING

#### Existing Conditions

The City of Glendale Public Works Department provides sewer collection and treatment services in the City of Glendale. Sewage from Glendale and other jurisdictions is treated by the City of Los Angeles Hyperion system, which includes the Los Angeles/Glendale Water Reclamation Plant (WRP), located outside the Glendale City limits in Los Angeles, and the Hyperion Treatment Plant (HTP), located in Playa del Rey.<sup>36</sup> The City of Glendale and the City of Los Angeles jointly own and share operating capacity of the Los Angeles/Glendale Water Reclamation Plant. Glendale entered into an amalgamated treatment and disposal agreement (Amalgamated Agreement) with the City of Los Angeles, which eliminates entitlements and reduces limitations on the amount of sewage discharged into the Hyperion system. Any Glendale sewage not treated at the Los Angeles/Glendale Water Reclamation Plant is treated at the Hyperion Treatment Plant.

Sewage from the Project would be treated by the HTP, which has a dry-weather design capacity of 450 million gallons per day (gpd) and is currently operating below that capacity, at 362 million gpd.<sup>37</sup> Glendale has access to this excess capacity upon payment of Amalgamated Sewerage System Facilities Charges to the City of Los Angeles.

Approximately 360 miles of underground sewer mains, ranging in size from 8 inches to 42 inches in diameter, are located throughout Glendale.<sup>38</sup> The City owns and maintains the sewer lines within its public rights-of-way. These sewer mains collect sewage and convey it to trunk lines and into regional interceptor sewers for conveyance to either the Los Angeles/Glendale WRP or the HTP for treatment. The sewer system uses the rolling topography in Glendale to allow gravity to convey the majority of its sewage with minimum pumping costs. Sewage from connections located north of the Los Angeles/Glendale WRP generally flows to this facility, and connections located south of the Los Angeles/Glendale Water Reclamation Plant flow to the HTP. However, if the Los Angeles/Glendale WRP is at capacity, sewage generated in the northern portion of the City will be pumped to the HTP.<sup>39</sup>

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36 City of Glendale Water & Power, 2010 Urban Water Management Plan (adopted June 2011), 52.

37 City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Facts and Figures, <http://www.lacitysan.org/wastewater/factsfigures.htm>.

38 City of Los Angeles Department of Public Works, Bureau of Sanitation.

39 Maurice Oillataguerre, Senior Environmental Program Specialist, City of Glendale, Public Works Department, personal communication with Meridian Consultants, October 2013.

To estimate the amount of sewage currently generated by existing uses at each site, sewage generation factors were applied to each existing use by land use type. As indicated in **Table 4.9.2-1, Estimated Existing Sewage Generation**, the current on-site sewage generation is approximately 2,978 gpd.

**Table 4.9.2-1  
Estimated Existing Sewage Generation**

Use	Area (sq. ft.)	Loading Factor	Daily Demand (gpd)	Annual Demand (gpy)
Apartment Building	4,770	200 gpd /1,000 sq. ft.	954	348,210
Retail Store (Office Depot)	25,302	80 gpd/1,000 sq. ft.	2,024	738,760
<b>Total</b>			<b>2,978</b>	<b>1,086,970</b>

*Source: Los Angeles Bureau of Sanitation Sewage Loading Factors.*

*Note: gpd = gallons per day; gpy = gallons per year; sq. ft. = square feet.*

## Regulatory Setting

Goals and policies that relate to the City's sewage collection and treatment system are set forth by the City in the General Plan Community Facilities Element. An analysis of the consistency of these applicable goals and policies with the Project is provided in **Section 4.3, Land Use and Planning**. As discussed in **Section 4.3**, the Project does not conflict with applicable General Plan goals and policies relating to the City's sewage collection and treatment system.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

To assist in determining whether a project would have a significant effect on the environment, the City determines a project may be deemed to have a significant impact on wastewater if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (issue is addressed in **Section 6.0, Effects Not Found to Be Significant**)
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

## Methodology

The impact of the Project on the existing sewage collection and treatment system was determined by evaluating existing sewage treatment and sewage conveyance capacity. To perform this evaluation, estimates of both existing and future sewage amounts were calculated. The projected increase in sewage from the Project site was then compared against existing system capacity to determine if sufficient capacity would be available to serve the Project.

## Project Impacts

**Threshold:**                    **Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects**

As discussed previously, sewage from the Project site goes to the Hyperion Treatment Plant, which Glendale has access to through the Amalgamated Agreement. With the Hyperion Treatment Plant currently operating at 88 million gpd below capacity, adequate capacity exists to treat Project-generated average effluent of 23,092 gpd (see **Table 4.9.2-2, Proposed Project Sewage Generation**). Therefore, the Project would not require the expansion or construction of sewage treatment facilities, the construction of which could cause significant environmental effects.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

**Threshold:**                    **Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments**

As shown in **Table 4.9.2-2, Proposed Project Sewage Generation**, the Project would, on average, generate 23,092 gpd of sewage.

**Table 4.9.2-2  
Proposed Project Sewage Generation**

<b>Use</b>	<b>Units</b>	<b>Average Loading Factor</b>	<b>Daily Generation (gpd)</b>
One-bedroom unit	117	120 gpd/unit	14,040
Two-bedroom unit	60	160 gpd/unit	9,600
Studio units	3	80 gpd/unit	240
Commercial space	18,200 sq. ft.	120 gpd/1,000 sq. ft.	2,184
Subtotal			26,064
Credit ( <i>Existing Development</i> )			(2,978)
<b>Total</b>			<b>23,092</b>

*Notes: Sewage generation rates were based on the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table, effective June 6, 1996.  
gpd = gallons per day; sq. ft. = square feet.*

Sewage generated on the Project site would be conveyed to the HTP for treatment, as discussed previously. With the HTP currently operating at 88 million gpd below capacity, the addition of approximately 23,092 gallons of average Project sewage per day would not result in the plant exceeding capacity. Therefore, adequate capacity exists to treat the sewage increase generated by the Project, and the impact of the Project on the sewage treatment system is less than significant.

In addition, the City imposes a sewer capacity increase fee on new developments, based on a computer modeling assessment of the Glendale's sewer system's hydraulic capacity. The fee is charged when development of a parcel leads to an increase in the volume of wastewater discharged to the collection system. The City has elected to calculate these fees based on proportional increases in wastewater flow, to impose the fee in an equitable manner.

The City's methodology for assessing the fee began with dividing Glendale's sewer system into eight drainage basins, and then determining the capital budget required to expand the capacity of each basin over the next 20 years, and the corresponding future peak flow for each basin.<sup>40</sup> The Project would be responsible for a percentage of the total capital budget for the associated sewer basin, which would result in a capital mitigation fee assessed to the Project.

The collected fees, which would be charged for each proposed development, will be deposited into a specially created account to be used to fund capacity improvements of the City-wide sewer system.

<sup>40</sup> City of Glendale Municipal Code, Chapter 13.40 Sewer System, Article II.

In the event the City receives proposals for new developments not considered in the current hydraulic analysis, intermediate and more frequent hydraulic analyses will be performed to evaluate capacity in the given drainage basin. As part of the City's annual Capital Improvement Program (CIP), the City Council annually budgets CIP programs, including when necessary funds for the balance of the cost of increasing the sewer capacity for any of the drainage basins. The City's Public Works Engineering Department designs and constructs the necessary improvements using the impact fees. The payment of this fee is available to reduce potential impacts of the Project on the sewer conveyance system; therefore, Project impacts would be less than significant with implementation of the sewer conveyance system mitigation fee.

**Level of Significance before Mitigation:** Significant.

**Mitigation Measures:** The following mitigation measure would reduce Project-related sewer impacts.

**4.9.2-1** The Project applicant shall pay a sewer capacity increase fee for the Project's sewage increase to the lines within the specific drainage basin where the particular Project is located to alleviate sewer impacts. These collected fees shall be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements to the drainage basin.

**Level of Significance after Mitigation:** Less than significant.

## Cumulative Impacts

**Threshold:** **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

As discussed previously, when the Los Angeles/Glendale WRP reaches capacity, the HTP, which Glendale has access to through the Amalgamated Agreement, would treat a majority of the waste generated by the Project and related projects. As shown in **Table 4.9.2-3, Generation of Sewage by Related Projects**, with the HTP currently operating at 88 million gpd below capacity, adequate capacity exists to treat the 565,014.54 gpd of effluent generated by cumulative development. Therefore, the Project and related projects would not require the expansion or construction of sewage treatment facilities, the construction of which could cause significant environmental effects. The cumulative impact of the Project and related projects is less than significant.

Development of the related projects may also require relocation/upgrades of existing sewer lines. These relocations/upgrades could result in short-term service interruptions for service area users, representing



a significant impact as well. Project impacts were determined to be less than significant. However, the City would require capacity upgrades to the sewer conveyance system prior to occupancy to avoid overloading the system on a project-by-project basis. Similarly, the City would also require that temporary sewer lines be installed and operational prior to construction to avoid service interruptions on a project-by-project basis. The inclusion of these requirements would reduce cumulative impacts to less than significant. Because the Project would require the provision of temporary replacement sewer lines, the Project's contribution would not be cumulatively considerable and, therefore, is less than significant.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

**Threshold:** **Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments**

As shown in **Table 4.9.2-3**, development of related projects would add approximately 922,023.20 gpd to the HTP or the City's sewage conveyance system. Combined with the increase of 23,092 gpd generated by the Project, the Project and related projects would generate an overall cumulative sewage demand of approximately 945,115.20 gpd.

**Table 4.9.2-3  
Generation of Sewage by Related Projects**

<b>Use</b>	<b>Units</b>	<b>Average Loading Factor (gpd/ 1,000 sq. ft.)</b>	<b>Daily Generation (gpd)</b>
Multifamily residential	4,030	160	644,800
Live/Work	47	160	7,520
Commercial	337,129	80	269,703.2
Restaurant	4,599	80	367.92
Hotel	266	130	34,580
Cinema/Studio	9,690	800	7,752
Church	9,500	200	1,900
Office	17,802	150	2,670.3
Medical office	18,000	250	4,500
<b>Total</b>			<b>922,023.2</b>

*Notes: Sewage generation rates were based on the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table, effective June 6, 1996.  
du = dwelling units; sq. ft. = square feet; gpd = gallons per day.*

As discussed previously, when the Los Angeles/Glendale WRP reaches capacity, the HTP would treat the remaining generated sewage. Therefore, a majority of the waste generated by the Project and related projects would be treated by the HTP. With the HTP currently operating at 88 million gpd below capacity, the additional 945,115.20 gpd of sewage generated by cumulative development would not exceed the plant's capacity. With excess capacity available to Glendale upon payment of fees to the City of Los Angeles, adequate capacity exists to treat sewage generated by the Project and related projects. Therefore, the cumulative impact of the Project and related projects on available sewage treatment capacity is less than significant.

Development of the related projects would place additional demand on the City's sewage conveyance system. Sewage conveyance infrastructure serving the individual related projects may not have adequate capacity to handle additional sewage loads, and such a lack of capacity may represent a significant impact. In an effort to alleviate sewer impacts, the City will impose a sewer capacity increase fee on all future developments adding demand for sewer system capacity within the City. The fee will be charged when development of a parcel leads to an increase in the volume of wastewater discharged to the collection system. The City has elected to calculate these fees based on proportional increases in wastewater flow. The collected fees will be deposited into a specially created account that will be used to fund capacity improvements of the Citywide sewer system. In the event the City receives proposals

for new developments not considered in the current hydraulic analysis, intermediate and more frequent hydraulic analyses will be performed to evaluate capacity in the given drainage basin. The Public Works Director will request consideration from the City Council to budget the funds for the balance of the cost of increasing the sewer capacity for any of the drainage basins, as part of its annual CIP when it determines such action to be appropriate and justifiable. The City's Public Works Engineering Division will then be able to design and construct the necessary improvements.

**Level of Significance before Mitigation:** Significant.

**Mitigation Measures:** The following mitigation measure would reduce potential cumulative sewer impacts.

**4.9.2-2** Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the specific drainage basin where the particular project is located. Fees would be determined based on the City's sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the specific drainage basin.

**Level of Significance after Mitigation:** Less than significant.

### ENVIRONMENTAL SETTING

#### Existing Conditions

##### *Regional Facilities*

Over 250 private waste haulers and several City governments collect solid waste in Los Angeles County. The City of Glendale Integrated Waste Management Division is the primary hauler for single-family residences, and all but a small percentage of 1- to 4-unit residential buildings in Glendale. It is estimated that the City is the collector for up to 80 percent of multifamily properties with 5 or more units and approximately 15 percent of nonresidential commercial land uses in Glendale. Accordingly, private companies haul waste for approximately 20 percent of the multifamily residential properties and approximately 85 percent of the nonresidential commercial land uses in Glendale.<sup>41</sup> The majority of the waste is disposed of at various landfills within the County. However, some of the waste is delivered to waste-to-energy transformation facilities or to intermodal facilities for transport to facilities outside of Los Angeles County.

Within Los Angeles County, there are four classifications of solid waste disposal facilities: (1) Class III landfills, (2) unclassified landfills, (3) transformation facilities, and (4) materials recovery facilities (MRF). Class III landfills accept all types of nonhazardous solid waste, while unclassified landfills accept only inert waste, including soil, concrete, asphalt, and other construction and demolition debris, as defined by *California Code of Regulations*, Title 23, Section 2554. Transformation facilities incinerate municipal solid waste to generate energy. MRFs recover recyclable materials from other waste to provide for the efficient transfer of the residual waste to permitted landfills for proper disposal.

The *County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report*, prepared by the County of Los Angeles Department of Public Works, indicates that residents and businesses in Los Angeles County (both incorporated cities and unincorporated areas) disposed of 8.81 million tons of solid waste in landfills in and out of Los Angeles County and at inert waste facilities in 2012. Of this amount, approximately 6.30 million tons were disposed of at Class III landfills within Los Angeles County; approximately 1.84 million tons were exported to out-of-county Class III landfills;

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41 Mike Wiederkehr, Assistant Integrated Waste Management Administrator, City of Glendale, Public Works Department, personal communication with Meridian Consultants, August 20, 2014.

approximately 89,142 tons were disposed of in unclassified (inert) landfills; and approximately 569,539 tons were disposed of at waste-to-energy facilities.<sup>42</sup>

The estimated remaining capacity of permitted Class III landfills at the end of 2012 in Los Angeles County was approximately 129.2 million tons.<sup>43</sup> Based on the 2012 average disposal rate of 28,237 tons per day (6 days a week), including waste being imported to the County, local permitted Class III landfills will be at capacity in the year 2027. However, ultimate landfill capacity would be determined by several factors, including (1) expiration of various permits (e.g., land use permits, waste discharge requirements permits, solid waste facilities permits, and air quality permits); (2) restrictions to accepting waste generated only within a landfill's particular jurisdiction and/or watershed boundary; and (3) operational constraints.

The capacities of inert landfills are affected by these same factors, but not to the same extent. The total estimated remaining capacity of inert landfills at the end of 2012 in Los Angeles County was approximately 64.1 million tons.<sup>44</sup> Based on a 2012 average disposal rate of 286 tons of inert waste per day (6 days per week), there is remaining capacity for approximately 718 years.

Currently, most solid waste collected within Los Angeles County by private haulers is disposed of within the County. However, it is likely that independent solid waste haulers do and will continue to take solid wastes to facilities outside 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.

According to the 2012 Annual Report on the Countywide Summary Plan and Countywide Siting Element, there will be a shortage of permitted solid waste disposal capacity in the County, the result of a lack of suitable sites for developing new landfills, limited potential expansion of existing landfills, and strong public opposition to the siting of proposed solid waste management facilities. To address this issue, several landfills in the County have been recently expanded or proposed to be expanded, including the Chiquita Canyon, Lancaster, Scholl Canyon, and Whittier (Savage Canyon) Landfills. In addition, the County transports solid waste out of county to the El Sobrante Landfill in Riverside County, three landfills in Orange County, the Simi Valley Landfill & Recycling Center in Ventura County, and the

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42 County of Los Angeles Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan, 2012 Annual Report (August 2013), 16.

43 County of Los Angeles Department of Public Works (August 2013), 24.

44 County of Los Angeles Department of Public Works (August 2013), 25.

Mesquite Regional Landfill in Imperial County.<sup>45</sup> The combined out-of-County landfills would accept up to 21,350 tons per day from the County.

### **Local Facilities**

In 1989, residential and nonresidential uses in Glendale disposed of approximately 345,000 tons of solid waste.<sup>46</sup> By 2006, Glendale had reduced the amount of disposed solid waste by approximately 53 percent.<sup>47</sup> Similar to the disposal patterns Countywide, the decline can be attributed primarily to waste diversion programs, including waste reduction, recycling, and composting.

The City's Department of Public Works, Integrated Waste Management Division disposed of approximately 86,000 tons of solid waste in the 2012–2013 fiscal year.<sup>48</sup> The breakdown of the solid waste is as follows: 34,821 tons from residential units, which consist of single-family units and multifamily units with 4 units or less; 32,660 tons from commercial uses and multifamily units with 5 or more units; and 18,474 tons of green waste from residential uses.

In 2012, the report to California Department of Resources Recycling and Recovery (CalRecycle; formerly the California Integrated Waste Management Board) indicated that the City disposed of 135,367.0 tons of solid waste.<sup>49</sup> In 2012, the population for the City of Glendale was 192,654. The per capita disposal rate was 3.9 pounds per person per day (PPD). The per-resident disposal target rate is 5.5 PPD. The per-employment disposal rate was 9.4 PPD. The per-employee disposal target rate is 14.3 PPD.

**Table 4.9.3-1, Disposal Capacities of Primary Landfills Serving the City of Glendale**, provides the annual disposal quantity, annual capacity, remaining capacity, and permit status for the five landfills that receive the majority of the City's waste. As shown in **Table 4.9.3-1**, the combined remaining capacity of the five landfills was approximately 139.4 million tons.

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45 County of Los Angeles Department of Public Works (August 2013), 42.

46 City of Glendale, Source Reduction and Recycling Element (June 1991), ES-2.

47 California Department of Resources Recycling and Recovery (CalRecycle), "Jurisdictional Diversion/Disposal Rate Summary (1995–2006), Jurisdiction Glendale," <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversion.aspx>.

48 Mike Wiederkehr, electronic communication with Meridian Consultants, October 2013.

49 CalRecycle, "Jurisdiction/Diversion Rate Detail," <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=176&Year=2012>.

**Table 4.9.3-1**  
**Disposal Capacities of Primary Landfills Serving the City of Glendale**

Landfill Site	Location	Annual Permitted Capacity (million tons)	Annual Disposal (million tons)	Remaining Permitted Capacity (million tons)	Remaining Capacity (Years)
Chiquita Canyon	Valencia	1.8	0.9	4	2
Proposed Chiquita Canyon Expansion	Valencia	3.7	–	35.1	26
Nu-Way Arrow	Irwindale	2.3	0.5	–	–
Puente Hills	Near City of Industry	4.1	2.1	6.1	1
Scholl Canyon	Glendale	1.0	0.2	3.4	16
Proposed Scholl Expansion	Glendale	1.1	–	6.0	21
Sunshine Canyon	Valencia	3.8	2.2	74.4	20
<b>Total Remaining Capacity (2012)</b>				<b>87.9</b>	<b>39</b>

Source: County of Los Angeles Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan, 2012 Annual Report (August 2013), Appendix E-2, Table 1.

Notes: The proposed expansion capacities of Chiquita Canyon and Scholl Canyon are not included in the total remaining capacity.

CalRecycle has not reported the Nu-Way Arrow facility remaining permitted capacity.

Scholl Canyon Landfill, which is located at 3100 Scholl Canyon Road, is the main facility that receives the City's solid waste; however, other landfills in Los Angeles County may accept solid waste from Glendale's private haulers.<sup>50</sup> This site consists of 530 acres, of which Los Angeles County owns 25 acres, Southern California Edison owns 30 acres, and the City of Glendale owns the remaining 475 acres. According to the Glendale Municipal Code, Chapter 8.56, only solid waste generated by residential and nonresidential uses in the Scholl Canyon Watershed can be disposed at the Scholl Canyon Facility.

Approximately one-half, or about 128,000 tons, of the solid waste disposed of at the Scholl Canyon landfill came from outside sources. This landfill has a remaining permitted capacity of 3.4 million tons, or an estimated remaining life of approximately 16 years. The City, if needed, would have access to all the remaining capacity of the landfill by no longer accepting solid waste from other jurisdictions, thereby extending the life of the landfill.

<sup>50</sup> Maurice Oillataguerre, personal communication with Meridian Consultants, January 22, 2013.

Another local facility that the City of Glendale owns is the Brand Park Recycling Facility, which is located at 1602 West Mountain Street in Glendale. Use of this recycling facility is limited to City work crews; it is not open to the public. The facility collects concrete and asphalt from street renovation projects, which are stockpiled for recycling.<sup>51</sup>

Construction debris generated by projects in the area is recycled at certified mixed-debris recycling facilities. The City's Integrated Waste Management Division identifies six such facilities: California Waste Services in Los Angeles, Community Recycling in Sun Valley, Direct Disposal in Los Angeles, Interior Removal Specialist in South Gate, Looney Bins/Downtown Diversion in Los Angeles, and Looney Bins/East Valley Diversion in Sun Valley. As shown in **Table 4.9.3-2, Annual Permitted Capacities of Certified Recycling Facilities**, the permitted annual capacities at these six facilities range from 37,440 to 530,400 tons.

**Table 4.9.3-2  
Annual Permitted Capacities of Certified Recycling Facilities**

<b>Landfill Site</b>	<b>Location</b>	<b>Annual Permitted Capacity (tons)</b>
California Waste Services	Los Angeles	300,000
Community Recycling	Sun Valley	530,400
Direct Disposal <sup>1</sup>	Sun Valley	37,440
Interior Removal Specialist	South Gate	n/a
Looney Bins, Downtown Diversion	Los Angeles	525,000
Looney Bins, East Valley Diversion	Los Angeles	273,750

Source: CalRecycle, SWIS Facility/Site Search (accessed 2014),

<http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx>; County of Los Angeles Countywide Integrated Waste Management Plan, 2012 Annual Report (accessed 2014), <http://dpw.lacounty.gov/epd/swims/docs/pdf/CIWMP/2012.pdf>.

<sup>1</sup> Used a conversion factor of 1,200 pounds per cubic yard. 200 cubic yards per day × 1,200 pounds per cubic yard = 240,000 pounds per day / 2,000 pounds per ton = 120 tons per day.

51 Maurice Oillataguerre, personal communication with Meridian Consultants, January 22, 2013.



## Project Site Generation

The amount of solid waste generated by the existing uses on the Project site was estimated using solid waste generation factors provided by CalRecycle.<sup>52,53</sup> As indicated in **Table 4.9.3-3, Estimated Existing Solid Waste Generation**, it is estimated that the existing uses at the Project site currently dispose 33,545 tons of waste per year into landfills.

**Table 4.9.3-3**  
**Estimated Existing Solid Waste Generation**

Use	Sq. Ft./units	Generation Rate (lb./sq. ft./day)	Waste Generated (lb./day)	Waste Generated (tons/year)
Retail-Commercial	25,302 sq. ft.	0.006	151.8	27,705.7
Multifamily	8 units	4.0	32.0	5,840.0
<b>Total</b>			<b>183.8</b>	<b>33,545.7</b>

Source: CalRecycle, *Waste Characterization: Estimates Solid Waste Generation and Disposal Rates* (2013).

Note: lb. = pounds; sq. ft. = square feet.

## Regulatory Setting

### California Integrated Waste Management Act

Because many of the landfills in the state are approaching capacity and the siting of new landfills becomes increasingly difficult, the need for source reduction, recycling, and composting has become readily apparent. In response to this growing solid waste problem, in September 1989, the State assembly passed Assembly Bill (AB) 939, known as the California Integrated Waste Management Act. This statute emphasizes conservation of natural resources through the reduction, recycling, and reuse of solid waste. AB 939 required cities and counties in the State to divert 25 percent of their solid waste stream from landfills by 1995 and 50 percent by year 2000, or face potential fines of millions of dollars per year. On June 30, 2008, the State Assembly amended Senate Bill 939 to include additional waste diversion goals of 60 percent by the year 2015 and 75 percent by the year 2025.<sup>54</sup>

The California Integrated Waste Management Act also requires that all cities conduct a Solid Waste Generation Study and prepare a Source Reduction Recycling Element. Glendale prepared a Solid Waste Generation Study in 1990 that established 1989 as the baseline for use in measuring diversion required

52 CalRecycle does not officially endorse any specific rate. However, they are provided for general information and planning purposes.

53 CalRecycle, *Waste Characterization, Estimated Solid Waste Generation and Disposal Rates*, <http://www.calrecycle.ca.gov/wastechar/wastegenrates/default.htm> (August 2014).

54 CalRecycle, formally known as the California Integrated Waste Management Board, *Senate Bill 1252 Amendment* (June 30, 2008).

under AB 939. The study measured current and projected quantities of waste that will be generated, disposed, and diverted from disposal in Glendale. In addition, the City also prepared a Source Reduction Recycling Element in 1991 to describe how it has attained the diversion goals established by AB 939 through source reduction, recycling, and composting. The following describes each of the Source Reduction Recycling Element's components.

### **Source Reduction**

The City identified five methods to reduce waste at the source: (1) in-house local government programs such as purchasing preferences and specifications for durable and reusable products, waste evaluation and employee education, increased use of electronic mail, and low-maintenance landscaping; (2) encourage source reduction in the private sector through technical assistance, business evaluation, education, and promoting backyard and institutional composting; (3) use recycled materials that would require waste reduction planning through the business license process and banning products that cannot be recycled or reused; (4) rate structure modifications; and (5) economic incentives to encourage waste reduction.

### **Recycling**

Recycling goals include (1) the development of materials recovery facilities; (2) the continuation and expansion of commercial recycling activities; (3) the development of a municipal buy-back center and drop-off center within the same facility; (4) the expansion of the Civic Center office paper recycling program; (5) increasing the frequency of the curbside recycling program; and (6) implementing a salvaging program at Scholl Canyon for white goods (e.g., paper), metals, and wood.

### **Composting**

The City has developed its own yard waste composting facility, which will potentially involve neighboring cities. The City is also investigating the feasibility of composting mixed solid waste. The City currently has an active backyard composting effort underway. City-collected yard trimmings are not composted but are ground and used as alternative daily cover at the Scholl Canyon Landfill.

### **SB 1016**

With the implementation of Senate Bill 1016, approved in June, 2012, CalRecycle no longer calculates diversion rate based on actual disposal and estimated annual generation using CalRecycle's adjustment methodology. Diversion rate is the prevention and reduction of generated waste through source reductions. As a result, Countywide diversion rates are no longer calculated. The last diversion rates approved by CalRecycle were for 2006. Considering each jurisdiction's approved diversion rate, a Countywide diversion rate for 2006 was estimated to be 58 percent.

Under SB 1016, a target per capita disposal rate, which is equivalent to a 50 percent diversion rate, is calculated using an approved jurisdiction specific average of per capita generation rates for the years 2003 to 2006. To establish compliance with AB 939, each jurisdiction's per capita disposal rate is calculated for each reporting year and compared with their individual target rates.

Using projections of population, employment, and real taxable sales from the University of California, Los Angeles, it is estimated that to meet the per capita disposal requirements, jurisdictions in Los Angeles County would need to continue their diversion programs as well as other disposal reduction strategies.

### ***California's 75 Percent "Recycling" Goal***

On October 6, 2011, Governor Brown signed AB 341, establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandated that local jurisdictions implement commercial recycling by July 1, 2012. The first review of jurisdictions' that are in a biennial review cycle on its implementation of regulation will occur in August, 2014.

### ***Local Regulations***

Chapter 8.58 of the Glendale Municipal Code requires that all construction and demolition debris be taken to a "certified mixed-debris recycling facility," or a recycler must divert all accepted waste from the landfill. A certified mixed-debris recycling facility is a processing facility that is certified as having obtained all applicable federal, State, and local permits and diverts a minimum of 50 percent of all incoming mixed construction and demolition debris.<sup>55</sup> In addition, project applicants must pay a diversion security deposit and prepare a waste reduction and recycling plan. The diversion security deposit is refundable upon request within 1 year of the certificate of occupancy and upon the determination by the director that the applicant has complied with the diversion requirements and submitted a waste reduction and recycling plan.

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55 Glendale Municipal Code, sec. 8.58.010, amended October 23, 2008.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

To assist in determining whether a project would have a significant effect on the environment, the City determines that a project may be deemed to have a significant impact on solid waste if the following could occur:

- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs
- Comply with federal, State, and local statutes and regulations related to solid waste

### Methodology

Solid waste generation associated with Project operation was estimated using CalRecycle factors determined by land use type. The factors are provided in pounds of solid waste generated per residential unit. The estimated existing solid waste generation was subtracted from the estimated amount of solid waste generated for the Project to determine the net increase of solid waste that would be generated by the proposed Project. The increase associated with operation of the Project was then compared with landfill capacity to evaluate potential impacts on solid waste disposal capacity.

### Project Impacts

**Threshold:**                    **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs**

#### ***Construction***

Construction of the Project would involve site preparation activities (e.g., demolition of existing buildings and surface parking) that would generate approximately 11,720 cubic yards of waste materials. The Project Applicant would be required to take all the construction and demolition debris to a certified mixed-debris recycling facility, which recycles a minimum of 50 percent of all waste received, or a recycler must divert all accepted waste from the landfill. Construction debris generated on the Project site would be disposed of at one of the recommended facilities or at a recycling facility that diverts all construction and demolition waste, in accordance with Chapter 8.58 of the Glendale Municipal Code. As shown in **Table 4.9.3-2**, the permitted annual capacities at the six certified mixed-debris recycling facilities can accept a range of annual permitted capacity from 37,440 to 530,400 tons. The one-time disposal of 11,720 cubic yards of demolition debris generated by the Project would be served by the certified facilities; therefore, the impact of the Project on the certified facilities would be less than significant.

In addition, construction of the proposed structure would generate waste materials. A majority of the construction waste would be readily recyclable materials such as wood, concrete, metals, and soil. This material will be collected on site in accordance with the City's Construction and Demolition Debris Recycling Ordinance and sent to commercial facilities located in Los Angeles County. Therefore, the impact of waste generated during the construction of the proposed structure is less than significant.

### Operation

Project implementation would result in an increase in residential development on site. **Table 4.9.3-4, Estimated Solid Waste Generation**, provides the projected amount of solid waste that would be generated by the Project. The Project would generate approximately 151 tons per year of solid waste. With implementation of the Project, the citywide projected solid waste disposal would be 143,055.3 tons per year, and the City's per capita disposal population rate would be 3.9 PPD, which would be under the 5.5 PPD population target for the City.

**Table 4.9.3-4  
Estimated Solid Waste Generation**

Use	Units	Generation Rate (lb./sq. ft./day)	Waste Generated (lb./day)	Waste Generated (tons/year)
Multifamily residential	180 du	4	720	131.4
Commercial	18,200 sq. ft.	0.006	109.2	19.9
<b>TOTAL</b>			<b>829.2</b>	<b>151.3</b>

Source: CalRecycle, *Waste Characterization: Estimates Solid Waste Generation and Disposal Rates (2013)*.

Note: du = dwelling units; lb. = pounds; sq. ft. = square feet.

Solid waste generated on the Project site would be deposited at the Scholl Canyon Landfill, which is owned by the City of Glendale, or at one of the landfills located within the County of Los Angeles. As indicated in **Table 4.9.3-1**, the annual disposal rate at the Scholl Canyon facility is 200,000 tons per year. Combined with the increase of 151.3 tons per year in solid waste generated by the Project, the annual disposal amount would increase to approximately 200,151.3 tons per year. With a total remaining capacity of 3.4 million tons, the Scholl Canyon facility would meet the needs of the City and the Project for approximately 16 years. Furthermore, once the permitted capacity is exhausted at the Scholl Canyon facility, approximately 6 million tons of potentially available capacity would still remain at the site.<sup>56</sup> Because the Project would be required to implement a waste-diversion program aimed at reducing the

<sup>56</sup> County of Los Angeles Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan, 2012 Annual Report (August 2013), 59.

amount of solid waste disposed in the landfill, the amount of solid waste generated would likely be less than the amount estimated. Examples of waste diversion efforts would include recycling programs for cardboard boxes, paper, aluminum cans, and bottles through the provision of recycling receptacles within garbage disposal areas.

The Scholl Canyon facility would have sufficient capacity to continue to accommodate the demand for Class III disposal facilities generated by the Project site. As such, the increase in solid waste generation associated with the operation of the Project would not exacerbate landfill capacity shortages in the region to the point of altering the projected timeline of any landfill to reach capacity. Therefore, the impact of the Project on permitted landfill capacity is less than significant.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

**Threshold:** Comply with federal, State, and local statutes and regulations related to solid waste

As part of the Project, the Applicant would implement a waste diversion program in an effort to help the City meet its waste diversion goal of 50 percent as mandated by State law (AB 939 and SB 1016). The proposed Project would enclose trash collection areas and would provide a recycling area to reduce the amount of solid waste sent to the landfill. It is anticipated that waste carts for household trash, recycling, and green waste will be provided. No federal statutes apply to the Project site. Therefore, the impact of the Project on compliance with federal, State, and local statutes and regulations is less than significant.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.

## Cumulative Impacts

**Threshold:** Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs

As shown in **Table 4.9.3-5, Projected Cumulative Solid Waste Generation**, the development of related projects would dispose of a projected 3,005.52 tons of solid waste into landfills every year. Combined with the additional annual tonnage of solid waste generated by the Project, the cumulative amount generated by new projects would be approximately 3,151.82 tons of solid waste per year.

**Table 4.9.3-5  
Projected Cumulative Solid Waste Generation**

Land Use	Sq. Ft./Unit	Generation Rate (lb./sq. ft.)/day	Waste Generated (tons/year)
Multifamily residential	4,030	4	2,514.7
Live/work	47	4	29.3
Commercial	337,129	0.005	262.96
Restaurant	4,599	0.005	4.2
Hotel	266	2	97.1
Cinema and studio	9,690	0.046	81.3
Church	9,500	0.006	8.9
Office	17,802	0.006	19.5
Medical office	18,000	0.006	16.8
<b>Total</b>			<b>3,005.52</b>

Source: CalRecycle, "Waste Characterization: Estimated Solid Waste Generation Rates," <http://www.calrecycle.ca.gov/wastechar/wastegenrates/default.htm>.  
Note: lb. = pounds; sq. ft. = square feet.

The current capacity of the Scholl Canyon Landfill is adequate to accommodate the solid waste disposal needs of the Project, and development of all related projects, for at least 16 years, if not longer. The City also utilizes four additional landfills, all of which are still currently accepting materials. The combined remaining capacity of the four landfills is estimated to last 94 years.

The County of Los Angeles landfills are a part of the Sanitation Districts of Los Angeles County (CSDLAC). The CSDLAC provides solid waste management for more than half the population in Los Angeles County. CSDLAC's service area covers approximately 815 square miles and encompasses unincorporated County territory, as well as 78 cities, including Glendale. CSDLAC operates a comprehensive solid waste

management system that includes landfills, recycling centers, transfer/materials recovery facilities, and gas-to-energy facilities.

Although insufficient permitted disposal capacity exists within the current system serving Los Angeles County to provide for its long-term disposal needs, additional capacity would be potentially available by expanding local landfills; by studying, promoting, and developing conversion technologies; by expanding the transfer and processing infrastructure; and, outside of Los Angeles County, via a regional waste-by-rail system and remote landfills. As currently proposed by CSDLAC, this regional system would utilize disposal capacity at the planned Mesquite Regional Landfill (MRL) in Imperial County.

CSDLAC entered into Purchase and Sale Agreements in August 2000 for the MRL, which is one of the only fully permitted rail-haul landfills in California.. MRL was completed in late 2008 and is permitted to accept up to 10,000 tons of waste per day in the first 10 years, with the option of increasing to 20,000 tons of waste each day from Los Angeles County. The permitted capacity of 460 million tons and a total capacity of 708 million tons would be able to provide approximately 100 years of disposal capacity for Los Angeles County.<sup>57</sup>

Further, there is presently insufficient permitted disposal capacity within the existing system serving Los Angeles County. The Project, in combination with other development, could contribute to insufficient permitted disposal capacity by contributing additional solid waste to regional landfills. Development under the Project would also contribute construction debris to regional landfills, increasing the cumulative effect. Therefore, the Project's contribution to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable impact.

**Level of Significance before Mitigation:** Significant.

**Mitigation Measures:** None feasible.

**Level of Significance after Mitigation:** Significant and unavoidable.

**Threshold:** **Comply with federal, State, and local statutes and regulations related to solid waste**

The City will continue to implement programs for source reduction and recycling and will require that subsequent projects complete environmental reviews to minimize solid waste disposal at disposal facilities. Furthermore, the State has set a goal to recycle, source-reduce, or compost 75 percent of solid

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<sup>57</sup> County of Los Angeles Department of Public Works, Los Angeles County Countywide Integrated Waste Management Plan, 2012 Annual Report (August 2013), 54.



waste generated. In addition, related projects are also required to comply with applicable municipal codes. As a result, the cumulative impact of the Project and related projects regarding compliance with applicable state and local solid waste statutes and regulations is less than significant.

**Level of Significance before Mitigation:** Less than significant.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance after Mitigation:** Less than significant.