

## Communication from Public

**Name:** Alison Waliszewski

**Date Submitted:** 09/12/2024 01:28 PM

**Council File No:** 21-0064

**Comments for Public Posting:** The 5 Gyres Institute strongly supports the Comprehensive Plastics Reduction Program and urges the Los Angeles City Council's Energy & Environment Committee to certify the Programmatic Environmental Impact Report (PEIR). Key recommendations include prioritizing washing machine filtration and textile disposal policies, eliminating single-use plastics, promoting reuse and refill systems, and taking immediate action to implement a Reuse for Dine-In Ordinance, refillable beverage bottle programs, and a ban on PFAS. Additionally, the 5 Gyres Institute calls for the avoidance of harmful downstream facilities such as advanced recycling and incineration, emphasizing the importance of upstream solutions like artificial turf and PVC regulation. The 5 Gyres Institute looks forward to collaborating with the City to ensure effective implementation of these initiatives.



# 5 GYRES

## SCIENCE TO SOLUTIONS

September 12, 2024

Los Angeles City Council  
Energy & Environment Committee  
200 N Spring St.  
Los Angeles, CA 90012

**RE: Energy & Environment September 13, 2024 Meeting Agenda Item #10, Council File 21-0064 - Bureau of Sanitation report relative to the Final Program Environmental Impact Report for the Comprehensive Plastics Reduction Program - SUPPORT**

Submitted electronically via: <https://cityclerk.lacity.org/publiccomment/?cfnumber=21-0064>

Dear Chair Yaroslovsky and Honorable Committee Members:

The **5 Gyres Institute**, has decades of experience in combating plastic pollution and its associated impacts. We have been working closely with the City Department of Sanitation and Environment (LASAN) on the development and implementation of the Comprehensive Plastics Reduction Program, and we are strongly supportive of this program. We deeply appreciate the City's ongoing efforts to combat the innumerable harms caused by plastic pollution on our communities. **We urge the Energy & Environment Committee to vote for certification of the Programmatic Environmental Impact Report (PEIR) for the Program and move forward with the staff recommended actions in the staff report. We also recommend that the Committee Members recommend directing the immediate drafting of a Reuse for Dine-In as a discretionary action.**

We have carefully reviewed the presented final PEIR and the responses to our comments and we respectfully offer further perspectives on several key issues along with more details on our recommended discretionary action as follows:

1. **Upstream Elements:** We urge the city to consider additional program elements such as regulations on artificial turf and Poly-Vinyl Chloride (PVC).
2. **Downstream Elements:** We strongly urge the city to avoid further consideration of harmful downstream facilities such as advanced recycling or incineration.
3. **Analysis and Policies:** We support the strong emphasis on eliminating single-use plastics and urge the city to focus on reuse and refill as a primary solution.

4. 5 Gyres recommends moving forward with dine-in reuse initiatives, implementation of refillable beverage bottle programs, and a ban on PFAS first.
5. **Recommended Discretionary Action:** Reuse for Dine In and Reuse and Refill Infrastructure

These comments and recommendations are further detailed below.

**Upstream Elements: We urge the city to consider additional program elements such as regulations on artificial turf and Poly-Vinyl Chloride (PVC)**

In response to our request for additional upstream elements, such as artificial turf and PVC, we understand that the City is not incorporating these elements into the current Program. We acknowledge that the scope of the Draft PEIR aligns with the Los Angeles City Council's recommendations from Council File #21-0064. We appreciate that future program elements may be considered as outlined in the Program Description, Section 2.2.6. However, we stress the importance of including a thorough analysis of these upstream elements in future iterations, as they are critical in achieving comprehensive waste reduction goals. We support the City's commitment to additional CEQA review for any new elements, ensuring that future discretionary actions are thoroughly assessed. The City is already moving forward with an effort to ban artificial turf and we strongly support that effort and urge this committee to vote for that action when it comes before them at a future committee meeting.

**Downstream Facilities: We strongly urge the city to avoid further consideration of harmful downstream facilities such as advanced recycling or incineration**

Regarding the downstream facilities, we recognize that the Notice of Preparation (NOP) for the Draft PEIR did not specify facility types due to the preliminary nature of the draft Program Description. We agree that further site-specific Environmental Impact Reports (EIRs) will be necessary for any future facilities to ensure comprehensive environmental analysis. Nonetheless, we urge the City to avoid endorsing or advancing waste-to-energy, incineration technologies, or other advanced recycling methods that have been historically problematic. Our support for the certification of the current PEIR does not imply endorsement of these technologies, and we will continue to advocate against their use in waste management strategies.

**Analysis and Policies: We support the strong emphasis on eliminating single-use plastics and urge the city to focus on reuse and refill as a primary solution.**

Master Response #6 emphasizes that the analysis of downstream effects relies on evidence from the Solid Waste Integrated Regional Plan (SWIRP) and acknowledges that the PEIR supports the City's goal of zero waste by 2050. We support the emphasis on reducing single-use plastics and promoting reusable alternatives. We also appreciate the incorporation of recent legislative developments, such as Assembly Bill 1857 (2022), which prohibits diversion credits for incinerators and requires rigorous evaluation of all feasible waste reduction methods.

**5 Gyres Institute's Priorities**

Our priorities have been carefully developed and are categorized in the table below (Table 1). We would like to emphasize our top near term priorities as the most pressing needs for the city and urge the city to move forward with these policies immediately.

Ranking	Policies
Top (Near-Term)	<ul style="list-style-type: none"> <li>• Textile disposal policies</li> <li>• Washing machine microfiber filtration</li> <li>• Refillable beverage bottles</li> <li>• Reuse for Dine In</li> <li>• PFAS Ban</li> </ul>
Middle (Mid-term)	<ul style="list-style-type: none"> <li>• Single-use plastic water bottles</li> <li>• Refillable plastic bottles</li> <li>• Single-use to-go foodware</li> <li>• Meal kit reuse and recycling</li> <li>• Coffee/beverage pods</li> <li>• City reusable foodware pilot projects</li> <li>• Single-use e-cigarettes</li> <li>• Single-use printer cartridges</li> <li>• Zero waste in food or beverage facilities</li> <li>• EPR program support</li> <li>• Public Outreach and Education</li> </ul>
Low (Long-Term)	<ul style="list-style-type: none"> <li>• Leashed lids on single-use plastic bottles</li> <li>• Single-use plastic beverage holder rings</li> <li>• Plastic tea bags</li> <li>• Plastic bag clips</li> <li>• Aerosol string</li> <li>• Plastic sandbags</li> <li>• Lighter-than-air balloons</li> </ul>

*Table 1: 5 Gyres' ranked priorities of upstream measures*

**We strongly recommend prioritizing the Reusable for Dine-In Ordinance and exploring the development of reusable infrastructure.** While the proposed policies for to-go foodware are important, further discussion and refinement are needed to address specific concerns raised by our members. Additionally, we advocate for a comprehensive PFAS ban across all packaging types.

**Recommended Discretionary Action: Reuse for Dine In and Reuse and Refill Infrastructure**

Based on our top, near-term priorities, we would urge further discretionary action on **the implementation of dine-in reuse initiatives, refillable beverage bottle programs, and a ban on intentionally added**

**PFAS.** This does not mean that we disapprove of the other recommendations as provided in Appendix I of the Inter-Departmental Correspondence from Director Barbara Romero (“the Appendix”) rather support those recommendations and urge this committee to also move forward with our recommended actions as well.

**Dine-in reuse initiatives:**

We urge the Council to take action to approve and disperse funds for the Pilot Program for Reusable and Returnable Take-out Foodware found in Page A1 of the Appendix. We concur with the justification and proposed implementation of the pilot. We urge the City to continue to work with a range of businesses that serve diverse communities.

Further, we urge the Council to adopt an ordinance as proposed on Page A6 of the Appendix to require Food or Beverage Facilities to provide only reusable foodware and foodware accessories, require condiments to be provided in reusable and refillable containers, and require single-use napkins to be made of 40% post-consumer recycled content.

**Implementation of refillable beverage bottle programs:**

We urge the Council to take action to approve and disperse funds for the proposed Refill Reuse Station Pilot Program as well as the Refillable Beverage Bottle Pilot Program found on Page A4 of the Appendix. We are appreciative of the recognition that the build-out of refill infrastructure is integral to transition over to refillable and reusable packaging.

Further, we urge the City to plan on additional water bottle refilling hydration stations as recommended on Page A8 of the Appendix.

**Ban on intentionally added PFAS:**

5 Gyres would like to encourage the City to adopt an ordinance to prohibit the sale and distribution of products that contain intentionally added PFAS as found on Page A13 of the Appendix.

**Closing**

The survey results indicate a clear focus on impactful environmental policies, particularly concerning single-use plastics and reuse systems. We support a staged approach to implementing these policies and are prepared to offer support for recommended motions that align with our priorities.

We look forward to collaborating further to refine these initiatives and ensure their effective implementation. Thank you for considering our comments and recommendations. Please feel free to reach out to us for any additional discussions or clarifications.

Sincerely,

Alison Waliszewski

Director of Policy & Programs

The 5 Gyres Institute

## **Communication from Public**

**Name:** Emily Parker, on behalf of Reusable LA and NGOs  
**Date Submitted:** 09/12/2024 03:01 PM  
**Council File No:** 21-0064  
**Comments for Public Posting:** please see our attached support letter



September 12, 2024

Los Angeles City Council  
Energy & Environment Committee  
200 N Spring St.  
Los Angeles, CA 90012

**RE: Energy & Environment September 13, 2024 Meeting Agenda Item #10, Council File 21-0064 - Bureau of Sanitation report relative to the Final Program Environmental Impact Report for the Comprehensive Plastics Reduction Program - SUPPORT**

*Submitted electronically via: <https://cityclerk.lacity.org/publiccomment/?cfnumber=21-0064>*

Dear Chair Yaroslavsky and Honorable Committee Members:

The undersigned organizations, including members and allies of the Reusable LA coalition, have combined decades of experience in combating plastic pollution and its associated impacts. We have been working closely with the City Bureau of Sanitation and Environment (LASAN) on the development and implementation of the Comprehensive Plastics Reduction Program and we are strongly supportive of this program. We deeply appreciate the City's ongoing efforts to combat the innumerable harms caused by plastic pollution to our communities. **We urge the Energy & Environment Committee to vote for certification of the Programmatic Environmental Impact Report (PEIR) and to move forward with the recommended actions in the staff report. We also ask that the Committee Members direct the immediate drafting of a Reuse for Dine-In as a discretionary action.**

The undersigned Reusable LA coalition members and allies have carefully reviewed the final PEIR and the response to comments. We support certification of the PEIR as written and we respectfully offer perspectives on next steps for several key issues along with more details on our recommended discretionary action as follows:

1. Upstream Elements: We urge the city to consider additional program elements beyond the PEIR such as regulations on artificial turf and Poly-Vinyl Chloride (PVC).
2. Downstream Elements: We strongly urge the city to avoid further consideration of harmful downstream facilities such as advanced recycling or incineration.
3. Analysis and Policies: We support the strong emphasis on eliminating single-use plastics and urge the city to focus on reuse and refill as a primary solution.

4. Reusable LA's Priorities: We recommend moving forward with dine-in reuse initiatives, implementation of refillable beverage bottle programs, and a ban on PFAS first.
5. Recommended Discretionary Action: Reuse for Dine In and Reuse and Refill Infrastructure

These comments and recommendations are further detailed below.

**Upstream Elements: We urge the city to consider additional program elements beyond the PEIR such as regulations on artificial turf and Poly-Vinyl Chloride (PVC)**

In response to our request for additional upstream elements, such as regulations on artificial turf and PVC, we understand that the City is not incorporating these elements into the current Program. We acknowledge that the scope of the Final PEIR aligns with the Los Angeles City Council's recommendations from Council File #21-0064. We appreciate that future program elements may be considered as outlined in the Program Description, Section 2.2.6. However, we stress the importance of including a thorough analysis of these upstream elements in future iterations, as they are critical in achieving comprehensive waste reduction goals. We support the City's commitment to additional CEQA review for any new elements, ensuring that future discretionary actions are thoroughly assessed. The City is already moving forward with an effort to ban artificial turf and we strongly support that effort and urge this committee to vote for that action when it comes before them at a future committee meeting.

**Downstream Facilities: We strongly urge the city to avoid further consideration of harmful downstream facilities such as advanced recycling or incineration**

Regarding the downstream facilities, we recognize that the Notice of Preparation (NOP) for the Draft PEIR did not specify facility types due to the preliminary nature of the draft Program Description. We agree that further site-specific Environmental Impact Reports (EIRs) will be necessary for any future facilities to ensure comprehensive environmental analysis. Nonetheless, we urge the City to avoid endorsing or advancing waste-to-energy, incineration technologies, or other advanced recycling methods that have been historically problematic. Our support for the certification of the current PEIR does not imply endorsement of these technologies, and we will continue to advocate against their use in waste management strategies.

**Analysis and Policies: We support the strong emphasis on eliminating single-use plastics and urge the city to focus on reuse and refill as a primary solution.**

Master Response #6 emphasizes that the analysis of downstream effects relies on evidence from the Solid Waste Integrated Regional Plan (SWIRP) and acknowledges that the PEIR supports the City's goal of zero waste by 2050. We support the emphasis on reducing single-use plastics and promoting reusable alternatives. We also appreciate the incorporation of recent legislative developments, such as Assembly Bill 1857 (2022), which prohibits diversion credits for incinerators and requires rigorous evaluation of all feasible waste reduction methods.

**Reusable LA's Priorities: We recommend moving forward with dine-in reuse initiatives, implementation of refillable beverage bottle programs, and a ban on PFAS first.**

Reusable LA is founded on the vision of a thriving culture of reuse and refill to combat plastic pollution in Los Angeles. Our coalition's priorities have been carefully developed and are categorized in the table



below (Table 1). We would like to emphasize our top near-term priorities as the most pressing needs for the city and urge the city to move forward with these policies immediately.

Ranking	Policies
Top (Near-Term)	Reuse for Dine-In Refillable Beverage Bottles Per- and polyfluoroalkyl substances (PFAS) Ban
Middle (Mid-term)	Refillable plastic bottles Single-use to-go foodware Meal kit reuse and recycling Coffee/beverage pods City reusable foodware pilot projects Textile disposal policies Washing machine microfiber filtration Single-use e-cigarettes Single-use printer cartridges Zero waste in food or beverage facilities EPR program support Public Outreach and Education Single-use plastic water bottles
Low (Long-Term)	Leashed lids on single-use plastic bottles Single-use plastic beverage holder rings Plastic tea bags Bioplastics ban Plastic bag clips Aerosol string Plastic sandbags Lighter-than-air balloons

*Table 1: Reusable LA ranked priorities of upstream measures*

**We strongly recommend prioritizing the Reusable for Dine-In Ordinance and exploring the development of reusable infrastructure.** While the proposed policies for to-go foodware are important, further discussion and refinement are needed to address specific concerns raised by our members. Additionally, we advocate for a comprehensive PFAS ban across all packaging types.

**Recommended Discretionary Action: Reuse for Dine In and Reuse and Refill Infrastructure**

Based on our top, near-term priorities, Reusable LA would urge further discretionary action on **the implementation of dine-in reuse initiatives, refillable beverage bottle programs, and a ban on intentionally added PFAS**. This does not mean that we disapprove of the other recommendations as provided in Appendix I of the Inter-Departmental Correspondence from Director Barbara Romero (“the Appendix”); rather, we support those recommendations and also urge this committee to move forward with our recommended actions as well.

*Dine-in reuse initiatives:*

We urge the Council to take action to approve and disperse funds for the Pilot Program for Reusable and Returnable Take-out Foodware found in Page A1 of the Appendix. We concur with the justification and proposed implementation of the pilot. We urge the City to continue to work with a range of businesses that serve diverse communities.

Further, we urge the Council to adopt an ordinance as proposed on Page A6 of the Appendix to require Food or Beverage Facilities to provide only reusable foodware and foodware accessories, require condiments to be provided in reusable and refillable containers, and require single-use napkins to be made of 40% post-consumer recycled content.

*Implementation of refillable beverage bottle programs:*

We urge the Council to take action to approve and disperse funds for the proposed Refill Reuse Station Pilot Program as well as the Refillable Beverage Bottle Pilot Program found on Page A4 of the Appendix. We are appreciative of the recognition that the build-out of refill infrastructure is integral to transitioning to refillable and reusable products.

Further, we urge the City to plan additional water bottle refilling hydration stations as recommended on Page A8 of the Appendix.

*Ban on intentionally added PFAS:*

RULA would like to encourage the City to adopt an ordinance to prohibit the sale and distribution of products that contain intentionally added PFAS as found on Page A13 of the Appendix.

**Closing**

The priorities of Reusable LA members indicate a clear focus on and support for impactful environmental policies, particularly concerning single-use plastics and reuse systems. We support a staged approach to implementing these policies and are prepared to offer support for recommended motions that align with our priorities. **We again urge the certification of the PEIR and recommend the council include our discretionary action in the immediate next steps of implementation.**

We look forward to collaborating further to refine these initiatives and ensure their effective implementation. Thank you for considering our comments and recommendations. Please feel free to reach out to us for any additional discussions or clarifications.

Sincerely,

Emily Parker  
Coastal & Marine Scientist  
Heal the Bay

Alex Choy  
Digital Campaigns Manager  
The Story of Stuff Project

Jack Eidt  
Co-Founder  
SoCal 350 Climate Action

Martha Camacho Rodríguez  
Director/Educator  
SEE (Social Eco Education)

Eugenia Ermacora  
Chapter Manager  
Surfrider Foundation Los Angeles

Jenn Engstrom  
State Director  
California Public Interest Research Group  
(CALPIRG)

Georgia Tunioli  
Environmental Engagement Program Director  
The Bay Foundation

Grace Lee  
National ReThink Disposable Director  
Clean Water Action

Aleksandar Pavlović  
Board President  
Resilient Palisades

Craig Cadwallader  
Policy Coordinator  
Surfrider South Bay Chapter

Natalie M. Freidberg  
Community Activist

Cc:  
COUNCILMEMBER KATY YAROSLAVSKY, CHAIR  
COUNCILMEMBER TIM McOSKER, VICE CHAIR  
COUNCILMEMBER BOB BLUMENFIELD  
COUNCILMEMBER KEVIN DE LEÓN  
COUNCILMEMBER NITHYA RAMAN

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