



California Environmental Quality Act Final Program Environmental Impact Report, & Comprehensive Plastics Reduction Program (Council File No. 21-0064)

STATE CLEARINGHOUSE (SCH) NO. 2023050007

LA Sanitation & Environment
Solid Resources Citywide Recycling Division

September 2024

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

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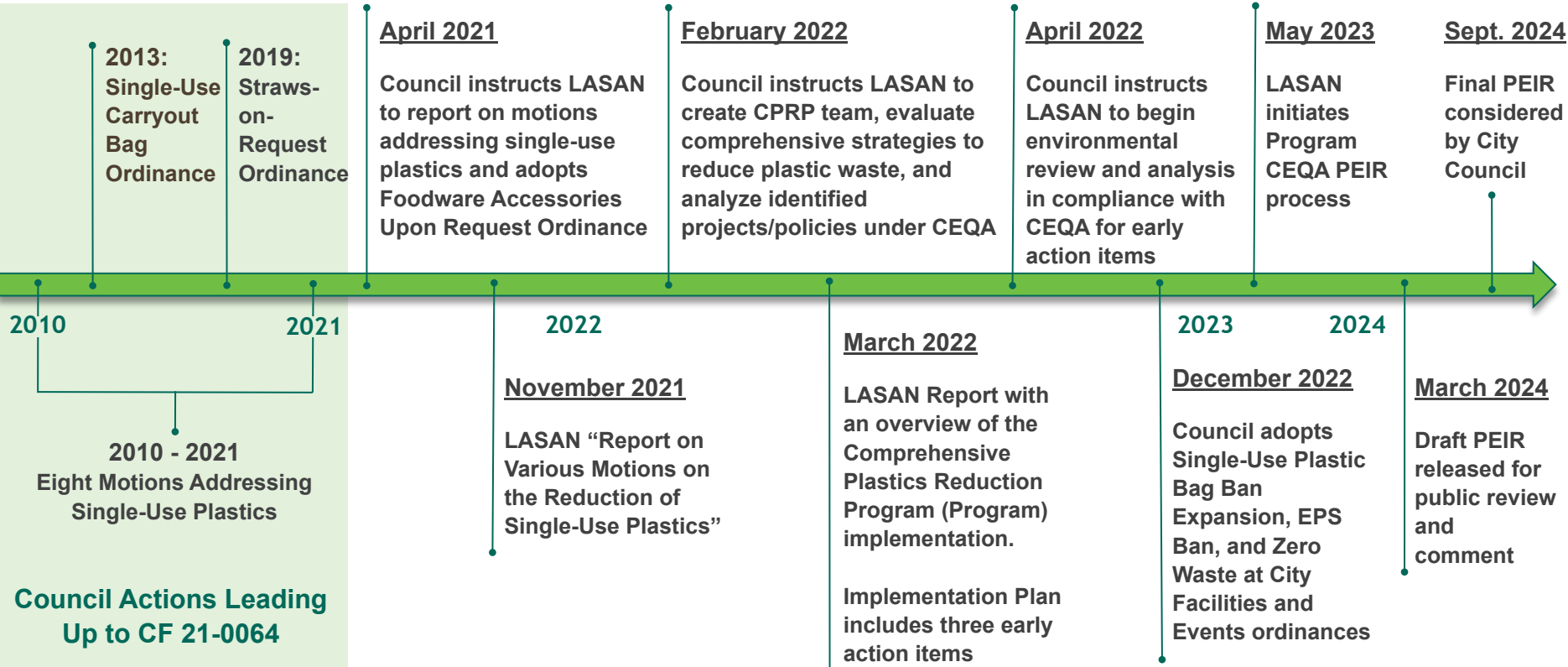


Background

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Council File 21-0064



How Has the City Responded to the Plastics Problem?

Leading the Way with Source Reduction Ordinances

2013

Single-use
Carryout
Bag
Ordinance
No.182604

2019

Straws Upon
Request
Ordinance
No.186028

2021

Foodware
Accessories
Upon
Request
Ordinance
No.187030

2022

Single-use
Carryout
Bag
Ordinance
(Expanded)
No.187716

2022

Expanded
Polystyrene
Ban
Ordinance
No.187717

2022

Zero Waste
at City
Facilities &
Events
No.187718



Program Overview

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Program Objectives

- Contribute to the City's goal of becoming zero waste by 2050
- Reduce the volume of single-use plastics, particularly those that cannot be composted or recycled in City-contracted facilities, into the City's waste stream
- Reduce the amount of plastic waste that is littered and pollutes water resources and has adverse effects on human health and wildlife
- Encourage and support the use of reusable alternative materials
- Reduce aesthetic degradation of the City due to plastic litter
- Develop downstream systems and facilities as needed to support the reuse, recycling, and composting of alternative products to single-use plastics



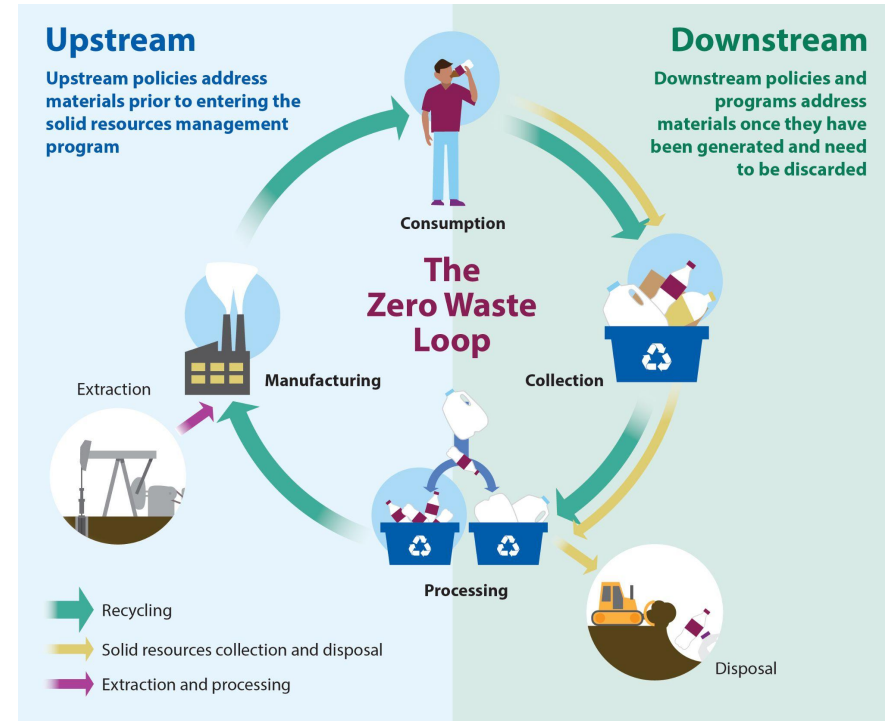
Program Location

- The proposed Program would occur throughout the entirety of the City of Los Angeles



Program Description

1. **Upstream measures** – reduce or eliminate production and use of single-use plastic products and encourage reuse of other items; and
2. **Downstream measures** – increase the City's ability to manage collecting, reusing, recycling, and composting of alternative materials and support reusable products



Program Description

Upstream Measures

Foodware

- Reusable foodware for dine-in services
- Single-use take-out foodware
- Meal kit reuse & recycling
- Bioplastics in foodware and food contact products
- Plastic in tea bags
- Single-use beverage pods

Plastic Bottles

- Single-use plastic water bottle
- Refillable plastic bottles
- Refillable beverage bottles
- Leashed lids on single-use plastic beverage bottles
- Single-use plastic beverage holder rings

Textiles

- Disposal of textiles
- Washing machine microfiber filtration

Other Products

- Plastic bag clips
- PFAS in products
- Aerosol string
- Plastic sandbags
- Lighter-than-air balloons
- Single-use e-cigarettes & vape cartridges
- Single-use printer cartridges

Program Description

Downstream Measures

Green Bin Facilities

- Anaerobic Digestion Facilities
- Aerobic Composting and Mulching Facilities

Blue Bin Facilities

- Clean Materials Recovery Facilities
- Resource Recovery Centers
- Construction and Demolition Materials Processing Facilities

Black Bin Facilities

- Mixed Materials Processing Facilities
- Advanced Thermal Recycling Facilities
- Non-combustion Thermal Technologies Facilities

Other Facilities

- Water Bottle Refilling Facilities / Hydration Stations
- Foodware and Linen Washing Facilities



CEQA Process & Environmental Analyses

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CEQA PEIR Process



● Opportunities for public input

Summary of Environmental Analyses

Potential Impacts of Upstream Measures

● No impacts

- Agriculture & Forestry Resources
- Cultural Resources
- Geology & Soils
- Land Use & Planning
- Mineral Resources
- Population & Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

● Less than significant impacts

- Aesthetics
- Air Quality
- Biological Resources
- Energy
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Noise
- Transportation
- Utilities & Service Systems

Summary of Environmental Analyses

Potential Impacts of Downstream Measures

● No impacts

- Population & Housing
- Recreation

● Less than significant impacts

- Energy
- GHG Emissions
- Public Services
- Mineral Resources
- Land Use & Planning

● Less than significant impacts with mitigation

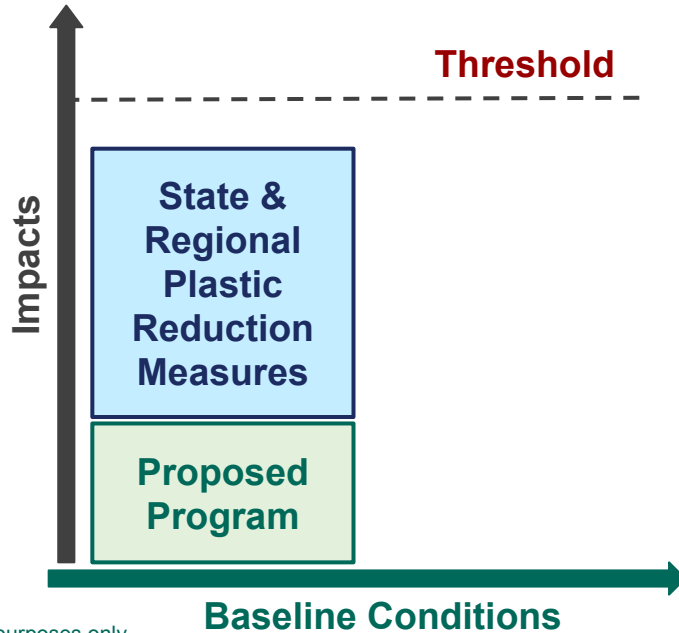
- Aesthetics
- Agriculture & Forestry
- Air Quality
- Geology & Soils
- Hydrology & Water Quality
- Utilities & Service Systems

● Significant & unavoidable impacts

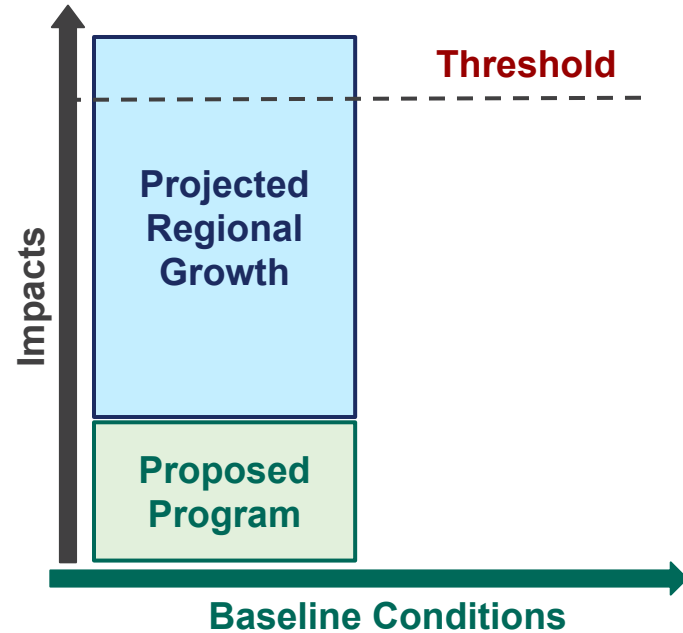
- Biological Resources
- Cultural Resources
- Hazards & Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources
- Wildfire

Cumulative Impacts Analysis

Upstream Measures No Significant Impacts



Downstream Measures Significant Impacts



*Illustrative purposes only.
Graphics are not to scale.

Alternatives Analysis

Alternatives

Alt 1: No
Program

Alt 2:
Extended
Producer
Responsibility

Response to Comments

- 131 written comment letters received
 - 99 from individuals
 - 2 from state and local agencies
 - 16 from environmental & environmental advocacy groups
 - 11 from industry & associations
 - 3 from neighborhood council groups
- The City has provided responses to all comments received



Findings of Fact, Statement of Overriding Considerations, & Mitigation Monitoring Plan

- **Findings of Fact:** Written findings for any identified significant environmental effects along with a brief explanation of the rationale for each finding.
- **Statement of Overriding Considerations:** PEIR identified potentially significant and unavoidable impacts, largely because the potential future locations of downstream facilities is not known at this time.

The benefits of the Program as approved outweigh its unavoidable significant effects, because the Program would fulfill the Program objectives.

- **Mitigation Monitoring Program:** Provides all mitigation measures identified for downstream facilities in the PEIR, steps and timeframe for compliance with the measures, and responsible monitoring agency.



Recommendations

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Pilot Programs for Consideration

- Reusable & Returnable Take-out Foodware
- Washing Machine Microfiber Filtration
 - Existing Clothes Washers
- Refillable Plastic and Beverage Bottles



Upstream Measures for Consideration

- Reusable Foodware for Dine-in Services
- Recyclable or Compostable Single-use Take-out Foodware
- Planning of Water Bottle Refilling Hydration Stations
- Single-use Electronic Smoking Device & Single-use Electronic Smoking Device Cartridge Ban
- Plastic Sandbag Ban
- Leashed Lids on Single-use Plastic Beverage Bottles
- Single-use Plastic Beverage Holder Ring Ban
- Single-use Printer Cartridge Ban
- Per- and polyfluoroalkyl substances (PFAS) in Products Ban
- Responsible Management of Returned and Unsold Apparel
- Plastic Bag Clip Ban
- Aerosol String (e.g., Silly String™) Ban
- Plastic in Tea Bag Ban
- Single-use Beverage Pod Ban
- Lighter-than-air Balloon Ban



Measures Requiring Additional Time

Not for Immediate Consideration

Upstream Measures

- **Additional planning and development is needed**
 - Single-use Plastic Water Bottle Ban
 - Washing Machine Microfiber Filtration - New Clothes Washers
 - Bioplastics in Foodware & Food Contact Products
 - Responsible Management of Excess Textiles & Apparel
 - Meal Kit Reuse & Recycling

Downstream Measures

- **Additional planning and CEQA is needed**
 - Green Bin Facilities
 - Blue Bin Facilities
 - Black Bin Facilities
 - Water Bottle Refilling Hydration Stations
 - Foodware & Linen Washing Facilities

Staffing Resources for Consideration

Key to Successful, Effective Implementation

Businesses visited	1200+
Outreach events attended	40+
Inquiries responded	100+
Ordinance Mailers Distributed	210,000+
CEQA Documents Prepared	4
Reusable Foodware Microgrants Distributed	\$600K



Recommendations for Council Action

1. **REVIEW** and **CONSIDER** the information contained in the Final PEIR for the proposed Program, comprised of the Draft PEIR with minor modifications indicated, comment letters received on the Draft PEIR and responses to those comments, and any other information in the record of proceedings; and **CERTIFY** that the Final PEIR was completed in compliance with the CEQA; that potentially significant environmental effects of the proposed Program have been disclosed and evaluated in compliance with the CEQA; and that the Final PEIR reflects and expresses the City of Los Angeles' independent judgment and analysis as the CEQA Lead Agency.
2. **ADOPT** the proposed Program's CEQA Findings, including the Statement of Overriding Considerations in Section 4 of the CEQA Findings and the Mitigation Monitoring Report in Section 5 of the CEQA Findings.
3. **SPECIFY** that the documents constituting the record of proceedings in this matter are located at the Office of the City Clerk, 200 North Spring Street, 3rd Floor, Los Angeles, CA 90012; the Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division, 1149 South Broadway, 5th Floor, Los Angeles, CA 90015; and any other relevant City departments.

Recommendations for Council Action

4. **APPROVE** the proposed Program as described in Section 2 of the Final PEIR, on a programmatic basis subject to subsequent City Council approval for the individual proposed Program items
5. **DIRECT** BOS, to report back on proposed definitions, impacted entities, implementation schedules, and enforcement for the upstream source reduction measures as specified by the City Council. The information provided by BOS should be based on the upstream measures evaluated in the Final PEIR, and their experience in implementing source reduction ordinances citywide, and current waste management operations within the City. The report is to be submitted to the Energy and Environment Committee for their review and consideration.
6. **DIRECT** the BOS to implement the upstream source reduction pilot program(s) as specified by the City Council. The pilot program(s) should be based on the upstream measures evaluated in the Final PEIR. BOS is to report back to the Energy and Environment Committee at the conclusion of the pilot program(s) with its findings and recommendations.
7. **DIRECT** the BOS to prepare an outreach program to inform and educate consumers and businesses about the proposed draft ordinances, as requested by City Council.

Recommendations for Council Action

8. **INSTRUCT** the City Administrative Officer (CAO) to report on the feasibility of regularizing the following six (6) positions and adding one (1) position in Fiscal Year 2025-2026, and to identify these positions as critical to public health and the environment.
 - a. The six (6) Resolution Authority positions:
 - i. One (1) Environmental Affairs Officer
 - ii. One (1) Environmental Supervisor II
 - iii. Three (3) Environmental Specialists II
 - iv. One (1) Principal Public Relations Representative
 - b. Add one (1) Environmental Compliance Inspector



Thank You

LA Sanitation and Environment
Solid Resources Citywide Recycling Division

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