FORM GEN. 160 (Rev. 6-80)

**CITY OF LOS ANGELES**
**INTER-DEPARTMENTAL CORRESPONDENCE**

**DATE:** August 27, 2026

**TO:** Honorable Adrin Nazarian, Chair
Honorable Katy Yaroslavsky
Honorable Ysabel Jurado
Honorable Nithya Raman
Honorable Imelda Padilla

**FROM:** Joone Kim-Lopez
Executive Director and General Manager
LA Sanitation and the Environment (LASAN)

**SUBJECT: CONSIDERATION OF CEQA ADDENDUM NO. 4 TO 2014 CERTIFIED PROGRAM EIR FOR CITYWIDE EXCLUSIVE FRANCHISE SYSTEM FOR MUNICIPAL SOLID WASTE FROM PRIVATELY SERVED COMMERCIAL AND MULTIFAMILY (RECYCLA) AND CONSIDERATION OF AMENDMENTS TO THE LOS ANGELES MUNICIPAL CODE AND LOS ANGELES ADMINISTRATIVE CODE PROVISIONS TO IMPLEMENT RECYCLA PROGRAM UPDATES.**

On June 9, 2026, the Los Angeles City Council requested the City Attorney, in coordination with LA Sanitation and Environment (LASAN), to prepare and present an ordinance modifying the City's exclusive waste hauling and recycling franchise system for commercial and multi-family properties, known as the recycLA Program, based on the information contained in LASAN's report under Council File No. 23-1032.

The City Council also directed LASAN to conduct the required environmental review pursuant to the California Environmental Quality Act (CEQA) for all discretionary actions associated with the proposed recycLA ordinance amendments and related program changes. This report transmits the Addendum No. 4 to the previously certified Program Environmental Impact Report for consideration and approval, and recommends adoption of the ordinance attached to the Council file transmitted by the City Attorney on July 29, 2026.

<u>RECOMMENDATIONS</u>

1. Find, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, including the Environmental Impact Report for the Citywide Exclusive Solid Waste Collection and Handling system (SCH #2013021052), certified on April 8, 2014 (2013 PEIR)

and Addendum No. 4 to the 2013 PEIR dated July 31, 2026; and pursuant to CEQA Guidelines, Section 15162 and 15164 and Addendum No. 4, dated July 31, 2026, that no major revisions to the 2013 PEIR are required and no subsequent EIR, or negative declaration is required for approval of the Project, as amended by Addendum 4.

2. Present and adopt the accompanying Ordinance, dated July 29, 2026, attached to Council File No. 23-1032, relative to amending Article 6, Chapter VI of the Los Angeles Municipal Code to modify the City's exclusive waste hauling and recycling franchise system, clarify minimum level of service requirements for non-City-serviced commercial establishments and multi-family dwellings, and establish a special fund within the Treasury of the City of Los Angeles named the "recycLA Administration Fee Special Fund.".

ATTACHMENT

1. Addendum No. 4 – CEQA Consistency Review for recycLA Program Updates: Amendments to Los Angeles Municipal Code Sections 66.03 and 66.33 and Establishment of the recycLA Administration Fee Special Fund with City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling PEIR (SCH #2013021052)

**BACKGROUND**

On April 8, 2014, the Los Angeles City Council certified the Final Program Environmental Impact Report (2013 PEIR) for the Citywide Exclusive Solid Waste Collection and Handling system and adopted Ordinance No. 182986, establishing an exclusive waste hauling and recycling franchise system for commercial and multi-family properties within the City, known as the recycLA Program.

On December 13, 2016, the City Council approved the award of Exclusive Franchise Agreements to seven franchise haulers, also known as recycLA Service Providers (RSPs), under Council File No. 10-1797-S17. All seven franchise agreements were executed on February 1, 2017. Pursuant to Article 14 of the franchise agreements, the contracts have an initial ten-year term, with two optional five-year renewal periods exercisable at the City's sole discretion. The initial term of the existing franchise agreements is set to expire on January 31, 2027, at which time the City may elect to renew any or all of the contracts for another five-year term.

In anticipation of the January 2027 contract expiration and the City's potential non-renewal of the existing agreements, on March 15, 2024, the City Council directed LA Sanitation and Environment (LASAN) to develop a new Request for Proposals (RFP) for the recycLA Program (Council File No. 23-1032). On September 15, 2025, the Board of Public Works authorized LASAN to issue a new RFP, providing solid waste collection companies the opportunity to submit proposals for new eight-year franchise agreements with the City.

On the same date, the Board of Public Works (Board) adopted California Environmental Quality Act (CEQA) Addendum No. 3 to the certified Program Environmental Impact Report and prior addenda for the 2025 recycLA RFP. The Board found that the issuance of a new RFP was within the scope of the previously certified Program EIR, that no new environmental impacts or mitigation measures would result, and that no additional environmental documentation was required. The Board also re-adopted the Mitigation Monitoring and Reporting Program, CEQA Findings, and Statement of Overriding Considerations originally adopted by the City on April 8, 2014, and approved the issuance of the new RFP.

Since its implementation, the recycLA Program has achieved many of its core objectives, including advancing environmental justice, reducing diesel particulate matter emissions, expanding recycling services to all customers, improving infrastructure through new and upgraded facilities, and enhancing working conditions for solid waste employees. While the program has been successful, its implementation has also revealed certain challenges. Lessons learned from the current franchise period have informed the development of the new RFP and will be incorporated into the next generation of recycLA franchise agreements. Some of these changes require updates to the LAMC and LAAC, including modifications to the structure of the franchise fee, the establishment of a special fund, and provisions related to the potential award and bundling of the small franchise zones.

**California Environmental Quality Act**

The proposed actions consist of targeted amendments to the Los Angeles Municipal Code (LAMC) and related Los Angeles Administrative Code (LAAC) provisions to implement recycLA Program updates and establish the recycLA Administration Fee Special Fund, including amendments to LAMC Sections 66.33.4, 66.33.5, and 66.03(d), and LAAC Section 5.121.5. These actions are discretionary actions subject to the California Environmental Quality Act.

The environmental impacts of the City's exclusive franchise system for commercial solid waste collection and handling were previously analyzed in the 2013 PEIR for the Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, State Clearinghouse No. 2013021052. The 2013 PEIR was certified by the Los Angeles City Council on April 8, 2014, and served as the CEQA document supporting implementation of the original recycLA Program beginning in 2017. The 2013 PEIR has been subsequently modified and evaluated through Addenda Nos. 1, 2, and 3.

To evaluate the proposed recycLA Program updates addressed in this report, Addendum No. 4 to the 2013 PEIR was prepared pursuant to CEQA Guidelines §§15162 and 15164. Addendum No. 4 evaluates whether the proposed LAMC and LAAC amendments would require preparation of a subsequent or supplemental EIR, or whether the proposed actions remain within the scope of the environmental analysis previously certified in the 2013 PEIR.

Addendum No. 4 evaluated the following proposed actions:

1. Amendment of LAMC Section 66.33.5 to replace the negotiated annual franchise fee with an annual administration fee and a one-time implementation fee to recover City costs associated with staffing salaries and benefits, compensated time off, overtime, supplies, services, transportation costs, equipment, professional and technical services, centralized services in accordance with the Controller's Cost Allocation Plan, contract administration, compliance monitoring, inspections, data management, billing dispute resolution, reporting, enforcement activities, and other program-related functions approved by the City Council;
2. Establishment of the recycLA Administration Fee Special Fund to receive payments of the annual administration fee and one-time implementation fee;
3. Amendment of LAMC Section 66.33.4 to redesignate the three "Single" Franchise Zones to "Small" Franchise Zones and allow a Small Franchise Zone to be awarded in combination with one or more other Small Franchise Zones, but not in combination with the other eight Franchise Zones; and
4. Amendment of LAMC Section 66.03(d) to clarify that the minimum level of service for non-City serviced Commercial Establishments and Multi-Family Dwellings includes an adequate number, size of containers, and collection frequency for Solid Waste, Commingled Recyclables, Source-Separated Recyclable Material, and Source-Separated Organic Waste sufficient to remove all material generated at the site within a seven-day period.

The proposed amendments are administrative, fiscal, and enforcement-related in nature and do not alter the physical structure, geographic footprint, or operational intensity of the recycLA Program. Specifically, the proposed amendments:

- retain the existing 11-zone franchise structure;
- retain the exclusive service provider structure of one recycLA Service Provider per zone;
- retain the restriction that service providers operate only within their awarded franchise zone or zones;
- do not expand the customer base or customer density within zones;
- do not change collection routes, service territory boundaries, or the overall number of franchise zones;
- do not increase the number or frequency of truck trips, except for ongoing regulatory compliance with SB 1383 organics requirements, which has been part of the environmental baseline since January 1, 2020;
- do not require changes in vehicle type, fleet composition, or fuel standards beyond existing regulatory requirements; and
- do not require or incentivize new or expanded solid waste, recycling, organics processing, transfer, or disposal infrastructure.

The proposed amendments would not result in new significant environmental impacts, would not substantially increase the severity of impacts previously identified in the 2013

PEIR, and would not involve new information of substantial importance that would trigger preparation of a subsequent or supplemental EIR under CEQA Guidelines §15162. The proposed fiscal changes, including the replacement of the franchise fee with an administration fee and implementation fee and the creation of a special fund, are administrative and financial mechanisms that do not directly or indirectly result in physical changes to the environment. Similarly, the amendment clarifying minimum service levels strengthens enforcement authority and harmonizes existing solid waste, recycling, and organics service requirements, but does not increase required collection frequency beyond what was previously analyzed or what is already required under applicable State law and existing City requirements. This amendment modifies the potential contract award structure for the three Small Franchise Zones, but does not modify the physical or operational structure of the recycLA Program, previously analyzed in the certified 2013 PEIR

Consistent with CEQA Guidelines §15162, Addendum No. 4 found that: (1) no substantial changes are proposed that would require major revisions to the 2013 PEIR due to new significant environmental effects or a substantial increase in the severity of previously identified effects; (2) no substantial changes in circumstances have occurred that would require major revisions to the 2013 PEIR; and (3) no new information of substantial importance has been identified that would require preparation of a subsequent or supplemental EIR.

Consistent with CEQA Guidelines §15164, Addendum No. 4 is appropriate because the proposed amendments represent minor changes and clarifications to the previously approved recycLA Program and none of the conditions requiring subsequent or supplemental environmental review under CEQA Guidelines §15162 are present.

Therefore, based on substantial evidence in the administrative record, the City may rely on the 2013 certified PEIR, the adopted Mitigation Monitoring and Reporting Program, the CEQA Findings and Statement of Overriding Considerations, and Addenda Nos. 1, 2, 3, and 4 for the discretionary approvals associated with the proposed recycLA Program updates. No subsequent or supplemental EIR is required.

**CONCLUSION**

The proposed recycLA Program updates represent targeted administrative, fiscal, and enforcement-related amendments intended to support implementation of the next generation of recycLA franchise agreements. These amendments include replacing the existing franchise fee structure with an administration fee and one-time implementation fee, establishing the recycLA Administration Fee Special Fund, clarifying minimum service requirements, and renaming the three existing “Single” Franchise Zones as “Small” Franchise Zones and allowing Small Franchise Zones to be bundled together with other Small Franchise Zones.

Addendum No. 4 concludes that the proposed actions remain within the scope of the previously certified 2013 PEIR and would not result in new significant environmental impacts, substantially increase the severity of previously identified impacts, or require new mitigation measures. Accordingly, no subsequent or supplemental EIR is required under CEQA Guidelines §15162, and the City may rely on the certified Program EIR, prior Addenda, the adopted Mitigation Monitoring and Reporting Program, and the CEQA Findings and Statement of Overriding Considerations for approval.

ATTACHMENT 1- ADDENDUM NO. 4

# Addendum 4-CEQA Consistency Review for recycLA Program Updates: Amendments to Los Angeles Municipal Code Sections 66.03 and 66.33 and Establishment of the recycLA Administration Fee Special Fund with City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling PEIR (SCH #2013021052):

| | |
|---|---|
| **Date:** | July 31, 2026 |
| **To:** | Christine Batikian<br>Environmental Supervisor<br>LA Sanitation and Environment |
| **From:** | Daniel Tormey PhD, PG, Technical Director, Catalyst Environmental Solutions |

## Introduction

Catalyst Environmental Solutions Corporation (Catalyst) has prepared this Addendum 4 pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15164 to evaluate whether the proposed amendments to the Los Angeles Municipal Code (LAMC) and Los Angeles Administrative Code (LAAC) relating to the recycLA Program require preparation of a subsequent or supplemental Environmental Impact Report (EIR) beyond the Program Environmental Impact Report (PEIR) certified by the City of Los Angeles on April 8, 2014 for the City-wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (hereinafter referred to as "2013 PEIR"; SCH No. 2013021052), as previously modified by Addenda 1, 2, and 3.

On November 14, 2012, Los Angeles City Council directed the City of Los Angeles' (City) Bureau of Sanitation (LASAN) to develop an implementation plan for the Exclusive Commercial and Multifamily Solid Waste Franchise system. LASAN prepared a Final Report (Exclusive Commercial and Multifamily Solid Waste Franchise Hauling System Implementation Plan) in April 2013 which described the existing open-market system and its limitations, identified goals for the Exclusive Franchise system, identified recommended Program strategies, and provided an implementation timeline. On April 8, 2014, the City Council certified the Final PEIR and adopted Ordinance No. 182986 establishing the recycLA Exclusive Franchise System. The 2013 PEIR evaluated the environmental effects of replacing the open-market commercial waste hauling system with an exclusive franchise system organized into 11 geographic zones, each served by one exclusive Franchise Waste Hauler (also referred to as "recycLA Service Provider", or RSP). Under recycLA, an exclusive RSP would be responsible for collecting and processing solid resources collected from its respective collection zone. The franchise zones, service accounts, and service levels are provided in Figure 1 below (which is Figure 2.1 of the 2013 PEIR).

On September 15, 2025, the Board of Public Works adopted Addendum 3 to the 2013 PEIR for the 2025 Request for Proposals (RFP) for recycLA 2.0, finding that the updated RFP remained within the scope of the 2013 PEIR and would not result in new or more severe environmental impacts.

This Addendum 4 evaluates subsequent proposed amendments to the LAMC and LAAC that are administrative, fiscal, and enforcement-related in nature and that do not alter the physical structure, geographic footprint, or operational intensity of the previously approved recycLA Program.

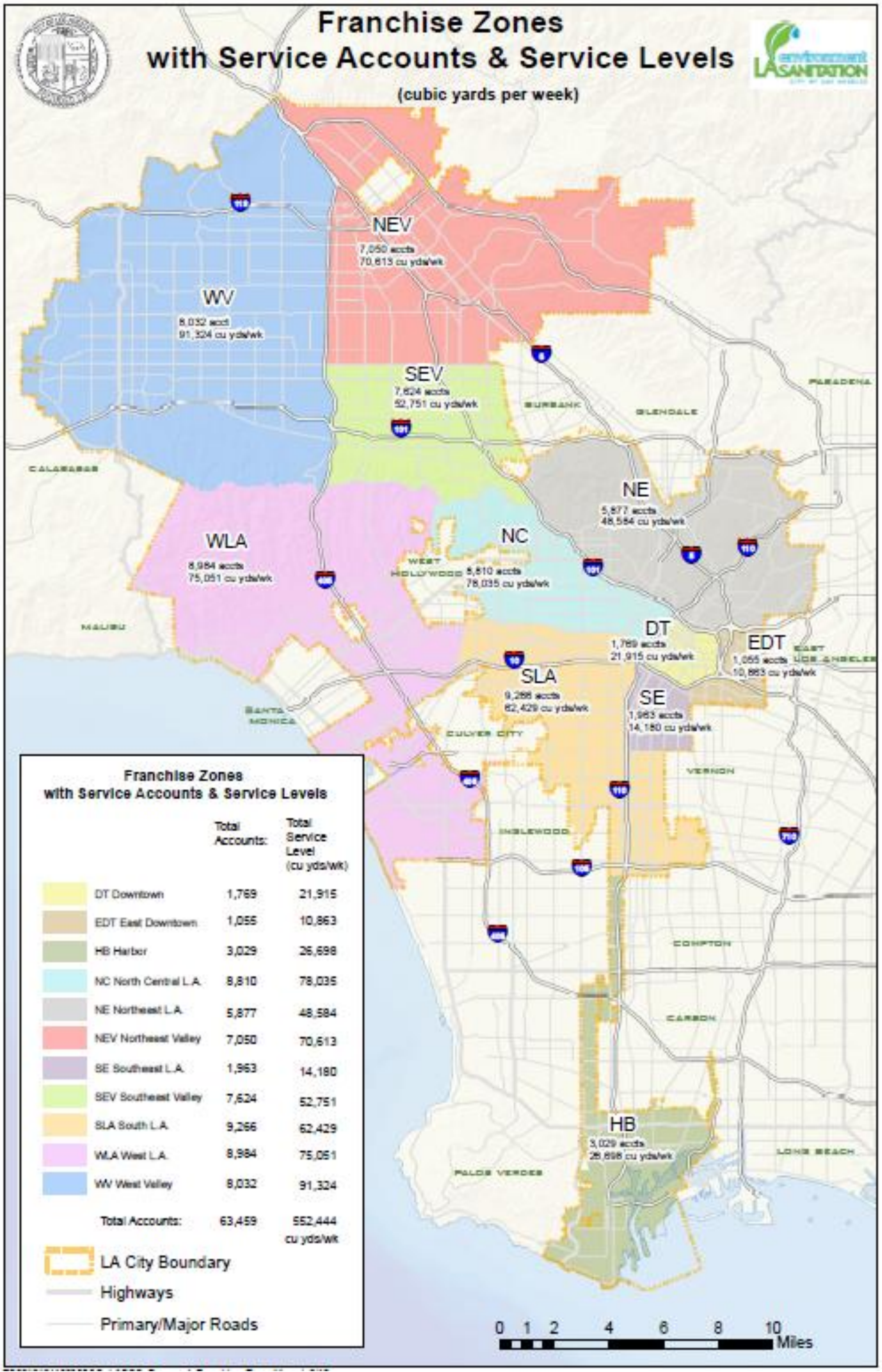


**Figure 1. Franchise Zone Map (2013 PEIR)**

## Description of the Proposed Amendments

The proposed discretionary actions consist of targeted amendments to the LAMC and LAAC, as summarized below:

1. Amend LAMC Section 66.33.5, FRANCHISE AGREEMENT FEES, to replace the negotiated annual franchise fee with the following two fees to be paid to the City by the respective franchisee:
   a. An annual administration fee designed to recover the City's costs to administer, oversee, and enforce the solid waste franchise system and the Franchise Agreements; and
   b. A one-time implementation fee to recover the City's costs associated with transitioning from existing Franchise Agreements to new Franchise Agreements, including contract implementation, start-up activities, and any other associated transition costs.

   Summary of Proposed Change: This change modifies only the fiscal structure of the franchise agreements and does not alter operational requirements, service levels, routes, fleet composition, or infrastructure.

2. Add a new Subsection (r) to Section 5.121.5 of the LAAC to create and establish a special fund within the Treasury of the City of Los Angeles named the "recycLA Administration Fee Special Fund" for the deposit of all revenues received from the collection of the annual administrative fee and one-time implementation fee established in Section 66.33.5(b) of Article 6 of Chapter VI of the LAMC.

   Summary of Proposed Change: This action is entirely fiscal and administrative.

3. Amend LAMC Section 66.33.4. FRANCHISE ZONES, to redesignate the three (3) "single" Franchise Zones to "Small" Franchise Zones, and allow a Small Franchise Zone to be granted to a Franchisee in combination with one or more other Small Franchise Zones, but not in combination with any of the other eight (8) Franchise Zones.

   Summary of Proposed Change: The total number of zones (11), geographic boundaries, service accounts, and exclusive zone structure remain unchanged.

4. Amend LAMC Section 66.03(d) to clarify that the minimum level of service to which the owner, generator, or agent of non-City serviced Commercial Establishments and Multi-Family Dwellings shall subscribe shall include an adequate number, size of containers, and collection frequency of containers for Solid Waste, Source-Separated Recyclable Material and Commingled Recyclables, and Source-Separated Organic Waste, sufficient to remove all material generated at the Commercial Establishment or Multi-family Dwelling within a seven-day period.

   Summary of Proposed Change: This amendment harmonizes existing service requirements and strengthens enforcement authority but does not increase required collection frequency beyond what is already required under State law (including Senate Bill 1383) and existing City ordinance.

Based on our review of the proposed amendments to the LAMC and LAAC, we understand that compared to the Program and alternatives analyzed in the 2013 PEIR, the proposed changes to LAMC and LAAC would address certain limitations within the recycLA Program that constrain the City's ability to fully implement the program objectives for waste diversion and service compliance, and recover the City's actual costs to administer and oversee the program. These proposed changes would not include changes to the physical environment. With respect to the analysis provided in the 2013 PEIR, the proposed LAMC amendments would:

- retain the existing zone structure;
- retain the structure of one RSP per zone;
- retain the restriction that RSPs be restricted to their zone(s);
- retain and expand on the provision that a single RSP may be awarded more than one franchise collection zone;
- not include expansion of the customer base or density within zones;
- not increase the number or frequency of truck trips with the exception of regulatory compliance with Senate Bill 1383 for organic material, which has been ongoing since January 1, 2020 and therefore is not a change related to the proposed amendments to the LAMC;
- not introduce requirements for change in vehicle type; and
- not introduce changes or incentives to increase the amount of physical infrastructure.

Compliance with Senate Bill 1383 (SB 1383) has been part of the environmental baseline since January 1, 2020 and was evaluated in Addendum 3. As such, LASAN compliance with SB 1383 is a separate regulatory compliance action that remains unchanged whether or not the proposed amendments to the LAMC are approved. As such, it is part of the environmental baseline for this consistency determination and addendum.

## CEQA Framework for Addendum

Under CEQA Guidelines Section 15162(a), when an EIR has been certified for a project, no subsequent EIR shall be prepared unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects, but the proponents decline to adopt them; or
    d. Mitigation measures or alternatives considerably different from those analyzed would substantially reduce significant effects, but the proponents decline to adopt them.

This Addendum applies these criteria to the proposed LAMC amendments. Note that proposed amendment to the LAAC are fiscal and administrative actions that do not commit the City to any specific project with the potential to result in a direct or reasonably foreseeable indirect physical change to the environment, and therefore is not a "project" subject to CEQA review pursuant to CEQA Guidelines Section 15378(b)(4) and CEQA Guidelines Section 15060(c)(3), and is therefore not considered further in this analysis.

## Analysis Under CEQA Guidelines Section 15162

The proposed amendments are minor administrative, fiscal, and enforcement clarifications with no physical changes. They do not propose substantial project changes under criterion (1), as there are no alterations to zones, operations, routes, fleet, customer base, infrastructure, or activities that would cause new or more severe effects.

There are no substantial changes in circumstances under criterion (2), as the underlying program (11 zones, exclusive RSPs, weekly collections including organics under SB 1383 baseline) remains the same. SB 1383 compliance is an existing condition since 2020.

No new information of substantial importance under criterion (3) has emerged that would trigger new or substantially more severe effects, infeasible mitigation becoming feasible (or vice versa), or superior alternatives not previously considered.

## Proposed Amendments to LAMC Would Not Lead to New or More Severe Impacts

The 2013 PEIR identified significant and unavoidable impacts to Air Quality, Greenhouse Gas Emissions (GHG), and Transportation and Traffic because some alternatives had overlapping routes of RSPs, leading to more truck trips which affect these resources. Cultural Resource impacts were identified as significant and unavoidable because the location of downstream facilities was not known. This consistency review analyzed whether the proposed amendments to the LAMC would lead to new impacts, or more severe impacts, compared to the findings of the 2013 PEIR. The review was conducted by Catalyst subject matter experts with knowledge of the issues and of CEQA. The result of this consistency analysis, based on the substantial evidence in the record, is documented in the environmental checklist presented in Table 1.

The proposed amendments to the LAMC would not introduce new programmatic, operational, or infrastructure changes that may directly or indirectly affect the physical environment, compared to what was analyzed in the 2013 PEIR and compared to the existing conditions related to SB 1383's January 1, 2020 requirements for management of organic materials. In addition, by keeping the current zones, and having no requirements or incentives for new or expanded facilities, the proposed amendments to the LAMC would not contribute to cumulative impacts beyond the analysis provided in the 2013 PEIR.

Therefore, the proposed amendments to the LAMC would not result in any new or more severe impacts compared to those identified in the 2013 PEIR.

**Table 1. Consistency with 2013 PEIR Impacts**

| CEQA Environmental Resource Area | Change to the Project That Would Affect the Resource? | New or More Severe Impact? |
|---|---|---|
| Aesthetics | No | No. Section 3.2.1 of the 2013 PEIR identifies impacts to aesthetics due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures that contribute to the visual characteristics of an area and/or |

| CEQA Environmental Resource Area | Change to the Project That Would Affect the Resource? | New or More Severe Impact? |
|---|---|---|
| | | contribute to light and glare and would have no adverse physical effects on scenic vistas within the City or scenic resources within a state scenic highway. |
| Agricultural and Forestry Resources | No | No. Section 3.2.2 of the 2013 PEIR identifies impacts to agricultural and forestry resources due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not alter any land use or zoning within the City, would not result in any ground-disturbing activity or changes in existing land use, and would not have any impact on agricultural lands, forest lands, or timberlands. |
| Air Quality | No | No. Section 3.1.1 of the 2013 PEIR identifies impacts to air quality due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would retain the 11 Exclusive Franchise Zones as well as weekly collection of black, blue, and green bins for the projected distribution of solid waste, comingled recyclables, and organics as analyzed in the 2013 PEIR and there would be no change to Vehicle Miles Traveled (VMT) or emissions associated with solid waste collection. Overall emissions are estimated to drop with compliance with the California Air Resources Board's (CARB) Advanced Clean Fleet Regulation. |
| Biological Resources | No | No. Section 3.2.3 of the 2013 PEIR identifies impacts to biological resources due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact to biological resources. |
| Cultural Resources | No | No. Section 3.1.2 of the 2013 PEIR identifies impacts to cultural resources due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact to cultural resources. |
| Geology and Soils | No | No. Section 3.2.4 of the 2013 PEIR identifies impacts to geology and soils due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact to geology or soils. |
| Greenhouse Gas Emissions | No | No. Section 3.1.3 of the 2013 PEIR identifies impacts related to greenhouse gas emissions due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would retain the 11 Exclusive Franchise Zones as well as weekly collection of black, blue, and green bins for the projected distribution of solid waste, comingled recyclables, and organics as analyzed in the 2013 PEIR and there would be no change to VMT or GHG emissions associated with solid waste collection. Overall emissions are estimated to drop with compliance with CARB's Advanced Clean Fleet Regulation. |

| CEQA Environmental Resource Area | Change to the Project That Would Affect the Resource? | New or More Severe Impact? |
|---|---|---|
| Hazards and Hazardous Materials | No | No. Section 3.2.5 of the 2013 PEIR identifies impacts related to hazards and hazardous materials due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve collection or transport of hazardous materials or involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact related to hazards and hazardous materials. |
| Hydrology and Water Quality | No | No. Section 3.2.6 of the 2013 PEIR identifies impacts to hydrology and water quality due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not result in discharges or involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact related to hydrology and water quality. |
| Land Use and Planning | No | No. Section 3.2.7 of the 2013 PEIR identifies impacts related to land use and planning due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not alter any land use or zoning within the City and would not result in any ground-disturbing activity or changes in existing land use and planning. |
| Mineral Resources | No | No. Section 3.2.8 of the 2013 PEIR identifies impacts to mineral resources due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or ground-disturbance activities that would contribute to an impact to mineral resources. |
| Noise | No | No. Section 3.2.9 of the 2013 PEIR identifies impacts related to noise due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or other construction or operational activities that would contribute to increase in noise levels at a sensitive receptor. Collection vehicles would continue operations as performed under existing conditions and would not contribute to an increase in traffic noise. |
| Population and Housing | No | No. Section 3.2.10 of the 2013 PEIR identifies impacts related to population and housing due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not result in the construction of new homes or businesses, would not include any other growth-inducing measures, and would not displace existing housing or people, thus there would be no impact to population and housing. |
| Public Services | No | No. Section 3.2.11 of the 2013 PEIR identifies impacts to public services due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would have no impact on the service ratios, response times, or performance objectives for fire protection, police protection, school, or park services. |

| CEQA Environmental Resource Area | Change to the Project That Would Affect the Resource? | New or More Severe Impact? |
|---|---|---|
| Recreation | No | No. Section 3.2.12 of the 2013 PEIR identifies impacts to recreation due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not include the construction of a recreational facility nor would it restrict access to any existing facility such that a new recreational facility would be needed. |
| Transportation and Traffic | No | No. Section 3.1.4 of the 2013 PEIR identifies impacts related to transportation and traffic due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not change the franchise zone structure or zoning structure or number of contractors allowed to operate in each zone. Further, the proposed amendment to the LAMC clarifying that the minimum level of service to which Commercial Establishments and Multi-Family Dwellings shall subscribe includes an adequate number, size of containers, and collection frequency for Solid Waste, Commingled Recyclables, Source-Separated Recyclables, and Organics, sufficient to remove all material generated at the site within a seven-day period would not increase service from what was analyzed in the 2013 PEIR (i.e., weekly service for all black, green, and blue bins). Thus, no change in VMT from what was analyzed in the PEIR is expected. In addition, the proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or other construction or operational activities that would contribute to increase in traffic, impede emergency access, or introduce geometric hazards. |
| Utilities and Service Systems | No | No. Section 3.2.13 of the 2013 PEIR identifies impacts to utilities and service systems due to the potential for expanded facilities, which is not included in the proposed amendments to the LAMC. The proposed amendments to the LAMC would not involve construction or modification of facilities nor demolition of existing structures or other construction or operational activities that would contribute to a change in utilities services to solid waste management facilities. Further, the proposed amendments to the LAMC would provide the City with additional tools and flexibility for the implementation and enforcement of solid waste reduction policies, goals, and requirements put forth in state and local laws, ordinances, and plans and would be in compliance with solid waste regulations. |

## Incorporation of Feasible Mitigation Measures Developed in the Program EIR

The City will continue to incorporate the mitigation measures adopted with the 2013 PEIR certified on April 8, 2014, as set forth in the adopted Mitigation Monitoring and Reporting Program (MMRP). In addition, the CEQA Findings and Statement of Overriding Consideration (adopted April 8, 2014) for significant unavoidable impacts remain applicable.

## Conclusion

Based on substantial evidence in the record, including the descriptions above and Table 1 checklist, none of the conditions in CEQA Guidelines Section 15162(a) are met. Specifically, the proposed amendments to the LAMC for the implementation of the Program were analyzed above per CEQA Guidelines 15162(a)(1). Accordingly, this Addendum 4 demonstrates the changes in the proposed amendments to the LAMC and LAAC do not lead to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, CEQA Guidelines 15162(a)(2) speaks to changed circumstances which could lead to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. This Addendum 4 finds that the proposed amendments to the LAMC and LAAC would not lead to construction or modification of facilities that were not already analyzed in the 2013 PEIR or result in any effects that would lead to new or more severe effects. The 2013 PEIR for the City-wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH #2013021052) and the associated MMRP and CEQA Findings and Statement of Overriding Considerations state that future actions would be subject to requirements in place at the time such construction may occur. These documents are incorporated by reference with links to the respective documents provided below.

Links to the relevant documents as incorporated by reference:

**Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling. SCH #2013021052. Available at:**
https://cityclerk.lacity.org/onlinedocs/2017/17-0878-S7_misc_7_11-15-2018.pdf

**Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling; Findings of Fact and Statement of Overriding Considerations. Available at:** https://cityclerk.lacity.org/onlinedocs/2010/10-1797-s16_MISC_3-13-14.pdf

**Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling; Final PEIR Mitigation Monitoring and Reporting Program. Available at:**
https://sanitation.lacity.gov/cs/groups/public/documents/document/mhfh/mdax/~edisp/qa001030.pdf

**Addendum 1, 2014 Certified Program EIR for the City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling. November 22, 2016. Available at:**
https://cityclerk.lacity.org/onlinedocs/2010/10-1797-S16_rpt_11-23-2016.pdf

**Addendum 2, 2014 Certified Program EIR for the City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling. October 2018. Available at:**
https://cityclerk.lacity.org/onlinedocs/2017/17-0878-S7_misc_3_11-15-2018.pdf

**Addendum 3, 2014 Certified Program EIR for the City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling. September 2025. Available at:**
https://dpwlacity.primegov.com/viewer/preview?id=24254&type=2

**Relevant Board and Council Files:**

Council File 17-0878-S7 (RecycLA Program / Citywide Exclusive Franchise System / Environmental Impact Report (EIR) / Facility Certification Program Plan / City Charter Section 245):
https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0878-S7

Council File 10-1797-S16 (City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling / Exclusive and Multifamily Solid Waste Franchise Collection and Handling System):
https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=10-1797-S16

Board of Public Works, Joint Board Report BPW-2025-0575:
https://dpwlacity.primegov.com/viewer/preview?id=24254&type=2

Council File 23-1032 (RecycLA Contracts / Service Providers Compliance / Objectives and Performance / Commercial Green Bin Service):
https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=23-1032