

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: July 7, 2026

TO: Energy and Environment Committee
The Honorable Adrin Nazarian, Chair
The Honorable Katy Yaroslavsky, Vice Chair
The Honorable Ysabel Jurado, Member
The Honorable Nithya Raman, Member
The Honorable Imelda Padilla, Member

FROM: ^{FOR} Sarai Bhaga, Interim Director and General Manager
LA Sanitation and Environment



SUBJECT: REPORT BACK RELATIVE TO THE FATS, OIL, AND GREASE (FOG) CONTROL PROGRAM (COUNCIL FILE NO. 25-0380)

COUNCIL INSTRUCTION

On June 4, 2025, the City Council adopted motion Council File 25-0380 instructing the Bureau of Sanitation (LASAN) to report back on the status of the Fats, Oil and Grease Program, and the feasibility of adjusting the \$100,000 monetary threshold related to remodeling Food Service Establishments (FSEs) to install grease interceptors, and other renovations that mitigate inappropriate disposal of waste products into the sewer system from these locations.

The Motion also instructs LASAN to include in the report ways that LASAN can enhance its media and educational outreach programs across all social media and communication platforms to re-engage the public and industry to reinforce that their compliance and diligence keeps the waste disposal infrastructure in top shape to protect the entire community from overflows and hazards.

RECOMMENDATIONS

1. Request the City Attorney, in coordination with LASAN, to prepare and present an ordinance amending Los Angeles Municipal Code Section 64.30.C.1(1)(3) to:
 - a. Clarify that all newly constructed Food Service Establishments (FSEs), and all existing non-FSE facilities converting to an FSE (change-of-use), are subject to gravity grease

interceptor requirements and are not eligible for a conditional waiver unless otherwise exempt under Subsection C.1.(c)(1).

b. Increase the Tenant Improvement valuation threshold for existing FSEs from \$100,000 to \$180,000 for projects requiring the installation of a gravity grease interceptor and provide for automatic adjustment of the threshold every three years, beginning July 1, 2026, based on the Consumer Price Index for All Urban Consumers (CPI-U), U.S. City Average, All Items, not seasonally adjusted, rounded to the nearest \$10,000 increment.

2. Direct LASAN to conduct enhanced media and educational outreach programs as discussed in this report.

BACKGROUND

Status of FOG Program and Feasibility of Adjusting \$100,000 Threshold

The Fats, Oils, and Grease (FOG) Control Program was established by LASAN in 2001 to reduce the discharge of FOG into the sewer system, to prevent Sanitary Sewage Overflows (SSOs) into the environment that can result from FOG buildup and blockages to sewer lines. The program aims to mitigate these issues through regulatory control of FSEs and public outreach. This program, which regulates over 8,000 FSEs, has operated effectively since its inception and has resulted in a reduction in FOG-related SSOs of approximately 98%, representing a significant public health and environmental success.

Regarding the feasibility of adjusting the current Tenant Improvement valuation threshold of \$100,000 (established on August 1, 2001) for the mandatory installation of a grease removal device (grease interceptor/grease trap), LASAN recommends increasing the threshold to \$180,000. The proposed \$180,000 threshold reflects the approximate inflationary increase in construction costs since the original \$100,000 threshold was established in 2001, based on the Consumer Price Index for All Urban Consumers (CPI-U), thereby maintaining the original policy intent without expanding or reducing the scope of the ordinance. LASAN further recommends that the threshold be adjusted every three years, beginning July 1, 2026, based on the CPI-U (rounded to the nearest \$10,000), to ensure it continues to reflect inflation over time.

A prior settlement agreement, that is in part related to the City's FOG program, was jointly terminated in May of 2015 and therefore does not prohibit revising the \$100,000 monetary threshold.

LASAN recommends the addition of language to Los Angeles Municipal Code (LAMC) Section 64.30.C.1(1)(3) to include tenant improvements for change of use, to convert an existing non-FSE facility to an FSE facility, to clarify all who are subject to the provisions of this section.

Media and Educational Outreach Enhancement

A core part of LASAN's mission is public engagement and education, especially in promoting compliance with best practices that help prevent SSOs and related hazards. LASAN's Environmental Compliance Inspectors (ECIs) engage directly with FSEs on a daily basis to promote best management practices for preventing FOG discharges into the sewer system. They also distribute educational materials such as flyers, posters, and pamphlets to reinforce these practices and promote proper handling, storage, and disposal of waste FOG materials.

As digital communication continues to evolve, it is essential for LASAN to utilize its media and educational outreach to ensure that both the public and industry stakeholders remain engaged, informed, and committed to maintaining the integrity of the City's waste disposal infrastructure. This report outlines strategies to enhance LASAN's FOG outreach across social media and communication platforms, to reinforce the importance of collective responsibility in safeguarding public health and the environment.

Recommended Outreach Enhancements:

A. Social Media Optimization

1. Platform-Specific Content Strategy
 - Instagram and YouTube: Short videos showing before/after cleanups, sewer maintenance, or staff spotlights.
 - X (Twitter): Real-time updates, event announcements, emergency alerts.
 - Facebook and NextDoor: Community articles, educational posts, interactive polls.
2. Collaborations
 - Partner with community based organizations including schools, industry-specific organizations and environmental organizations to amplify messaging and broaden reach.

B. Community Engagement Tools

Multilingual Education Materials

- Expand outreach with culturally and linguistically appropriate materials, especially in communities most impacted by SSOs.

- Create Toolkits that can be disseminated digitally and throughout the community outlining best practices and compliance information.

C. Industry-Focused Communication

- Launch a periodic e-newsletter for food service establishments (FSEs) and commercial entities with compliance tips, regulatory updates, and success stories.
- Conduct workshops and webinars on safe cooking and proper grease disposal techniques, demonstrating practical methods while meeting with oil recycling vendors and programs.

D. Metrics & Feedback Loop

- Implement analytics tools across all platforms to monitor engagement, identify high-performing content, and adjust strategies accordingly.
- Provide easy feedback channels for residents and businesses to ask questions, report issues, and suggest improvements.

CONCLUSION

To preserve the original intent of the City's Fats, Oils, and Grease (FOG) Ordinance while accounting for more than two decades of inflation, LASAN recommends increasing the Tenant Improvement valuation threshold for the mandatory installation of grease interceptors from \$100,000 to \$180,000. The proposed threshold reflects the approximate inflationary increase in construction costs since the original threshold was established in 2001, based on the Consumer Price Index for All Urban Consumers (CPI-U), thereby maintaining the original policy intent without expanding or reducing the scope of the ordinance. LASAN further recommends adjusting the threshold every three years, beginning July 1, 2026, based on the CPI-U (rounded to the nearest \$10,000), to ensure it continues to accurately reflect inflation over time. LASAN will publish the updated threshold on its website and incorporate it into Industrial Wastewater Permit applications to ensure all affected stakeholders are properly informed.

Since its implementation, LASAN's FOG Control Program has reduced FOG-related sanitary sewer overflows by approximately 98 percent, demonstrating the effectiveness of combining regulatory requirements with proactive education, inspection, and outreach. To build upon this success, LASAN will continue enhancing its engagement with both the public and the food service industry through modern, strategic, and inclusive communication efforts, including digital outreach, multilingual educational materials, and partnerships with community and industry organizations.

Together, the recommended ordinance amendments and enhanced outreach initiatives will preserve the original intent of the FOG Ordinance, reduce unintended regulatory burdens resulting from inflation, strengthen public awareness and compliance, and help protect the City's wastewater infrastructure, public health, and the environment for years to come.