

# City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling

SCH# 2013021052



Prepared by  
Bureau of Sanitation



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**March 2014**

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**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
for CITY ORDINANCE:**

**CITY-WIDE EXCLUSIVE FRANCHISE SYSTEM for  
MUNICIPAL SOLID WASTE COLLECTION  
and HANDLING**

**SCH #2013021052**

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**MARCH 14, 2014**

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## TABLE OF CONTENTS

SECTION	PAGE
<b>1 INTRODUCTION.....</b>	<b>1-1</b>
1.1 Project Background .....	1-2
1.1.1 Overview of City's Existing Waste Collection System for Commercial Establishments .....	1-2
1.1.2 Development of the Proposed Project .....	1-2
1.1.3 Project Goals and Objectives .....	1-3
1.2 Project Summary .....	1-4
1.2.1 Proposed Project .....	1-4
1.2.2 Summary of Environmental Impacts and Mitigation Measures .....	1-5
1.2.3 Comparison of Impacts – Proposed Project and Alternatives .....	1-5
1.3 Environmental Review Process .....	1-8
1.3.1 Contents of Final Program EIR .....	1-8
1.3.2 Final Program EIR Format .....	1-8
1.3.3 Program EIR Process .....	1-9
1.3.4 Availability of Final Program EIR .....	1-11
<b>2 CLARIFICATIONS AND CORRECTIONS.....</b>	<b>2-1</b>
<b>3 COMMENTS AND RESPONSES TO DRAFT PROGRAM EIR .....</b>	<b>3-1</b>
<b>4 ORGANIZATIONS AND PERSONS CONSULTED.....</b>	<b>4-1</b>
<b>5 REPORT PREPARATION PERSONNEL .....</b>	<b>5-1</b>
<b>6 MAILING/DISTRIBUTION LIST FOR FINAL PROGRAM EIR.....</b>	<b>6-1</b>
6.1 Final Program EIR Mailing/Distribution List .....	6-1

### TABLES

1-1	Comparison of Environmental Issue Areas by Alternative.....	1-6
1-2	Summary of Environmental Effects Exclusive Franchise System.....	1-13
3-1	List of Draft Program EIR Comment Letters .....	3-2

### APPENDICES

A	Notice of Completion
B	County Clerk Filing
C	Newspaper Notices

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## **SECTION 1 INTRODUCTION**

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This Final Program Environmental Impact Report (Final Program EIR) provides specific responses to public, agency, and organizations comments received on the Draft Program EIR for the Citywide Exclusive Franchise System for Solid Resources Collection and Handling for large multifamily residential units, commercial, industrial, and institutional establishments (Commercial Establishments) within the City of Los Angeles (City), California. The Proposed Project would replace the current open market system of collection and handling system of Solid Resources with a franchised Solid Resources collection and handling system comprised of 11 zones, with one exclusive Franchised Hauler per zone. The Proposed Project would increase diversion of materials away from landfill disposal by requiring Franchised Haulers to provide recycling services to Commercial Establishments and by establishing recycling and diversion goals.

This Program EIR consists of the Draft Program EIR released to the public and agencies on November 21, 2013 for review and comment, and this Final Program EIR that provides responses to the public and agencies comments received by Sanitation. The Program EIR has been prepared to comply with the California Environmental Quality Act (CEQA). The City is the Lead Agency for the Proposed Project pursuant to CEQA.

This Program EIR considers the overall effects of a series of phased actions for the Proposed Project and recommends steps to avoid unnecessary adverse environmental effects (CEQA Section 15168). A Program EIR is an EIR that may discuss a series of actions that can be characterized as one large project, or a series of actions under consideration that are related geographically, or are logical parts in the chain of contemplated actions. A Program EIR may also discuss a series of actions that are in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. The series of actions also may be considered as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways (CEQA Guidelines, Section 15168).

In accordance with CEQA Section 15168(c)(1), (2), (3), (4), and (5), during implementation of the Proposed Project, subsequent activities that may be implemented will be examined by the City to determine whether additional environmental documents must be prepared. As part of this process, in accordance with CEQA Section 15168(d)(1), (2), and (3), should the City determine that additional environmental analysis is required to implement subsequent activities, such additional environmental analysis could be tiered from this Program EIR (upon approval). The City prepared the Draft Program EIR and this Final Program EIR to support the fulfillment of the following seven major goals of CEQA (Section 15002 of the State CEQA Guidelines):

- To disclose to the decision makers and the public significant environmental effects of the proposed activities
- To identify ways to avoid or reduce environmental damage
- To mitigate environmental damage by requiring implementation of feasible alternatives or mitigation measures
- To disclose to the public the reasons for agency approvals of projects with significant environmental effects
- To foster interagency coordination in the review of projects
- To enhance public participation in the planning process
- To provide response to written public comments submitted to Sanitation regarding the Draft Program EIR.

The Program EIR consists of the Draft Program EIR and the Final Program EIR. Although the Program EIR neither controls nor anticipates the ultimate decision on the proposed ordinance by the City Council, the City Council (and other agencies that rely on this Program EIR) must consider the information in the Program EIR and make appropriate findings, where necessary.

## **1.1 PROJECT BACKGROUND**

### **1.1.1 Overview of City's Existing Waste Collection System for Commercial Establishments**

In 2002, Sanitation established a private sector permit system for the collection and management of waste and recovered materials from Commercial Establishments. Under the existing open market system, approximately 45 Permitted Haulers collect approximately 2 million tons annually of Solid Resources from Commercial Establishments (approximately 63,000 accounts). Currently, the Permitted Haulers operate under the following conditions:

- Permitted Haulers must obtain an annual waste hauler permit issued by the City.
- Permitted Haulers can operate throughout the entire City with no geographical restrictions.
- Permitted Haulers compete for individual service accounts.
- Permitted Haulers negotiate rates with each individual Commercial Establishment. The City does not set minimum or maximum rates that can be charged by Permitted Haulers.
- There is no limit on the number of accounts a Permitted Hauler can maintain, although no Permitted Hauler currently has more than 40 percent of accounts within the City.
- The City does not require Permitted Haulers to provide or offer recycling services, or meet specific diversion requirements.
- The City does not require Permitted Haulers to operate late model, low emission, or clean fuel vehicles.

### **1.1.2 Development of the Proposed Project**

The City's right and responsibility to manage Solid Resource collection is derived from the California Public Resources Code (PRC) and the Los Angeles Municipal Code. As described in the Draft Program EIR, Sanitation operates one of the largest municipal systems for collection of Solid Resources in the nation and has established a priority to increase the rate of diversion of Solid Resources that is currently disposed in landfills through increased diversion and recovery of recyclables and Organics.

Under the California Integrated Waste Management Act of 1989 (PRC, § 40000 *et seq.*), local agencies are allowed to grant exclusive operating rights to Solid Resources disposal companies (PRC, § 40059, sub. (a)(1)). If other disposal companies have been authorized by the agency to operate within the municipality's boundaries for more than 3 years, the municipality must notify the disposal company that their operating rights will expire within 5 years (§ 49520.). In response to direction from the Mayor and City Council, on July 7, 2006, Sanitation issued a 7-year notice to the Permitted Haulers operating in the City stating the City's intent to consider the modification of the existing multifamily waste hauling system provided to multifamily residential properties. On December 16, 2011, Sanitation issued a 5-year notice to Permitted Haulers, regarding Solid Resources handling for Commercial Establishments. These notifications meet the needs of notification for the Proposed Project, which may be implemented as early as 5 years after this notification.

#### **1.1.2.1 City Council Action**

On November 14, 2012, City Council adopted the actions in the Energy and Environment and Ad Hoc on Waste Reduction and Recycling Committee Majority Report, under Council File No. 10-1797. City Council instructed Sanitation to develop an exclusive (one Franchised Hauler per franchise zone) franchise system to modify the

existing Permitted Hauler system for the collection of Solid Resources from Commercial Establishments. City Council instructed Sanitation to prepare an EIR, and prepare an Implementation Plan. City Council further requested the City Attorney to prepare a City ordinance for the development and implementation of the Proposed Project.

In January 2013, Sanitation sent an information request to various existing Permitted Haulers soliciting input on the development of the form and structure of the Proposed Project. The responses to the information request were considered in the development of the Proposed Project and its alternatives, which are described in the Final Implementation Plan (FIP). Multiple meetings were held regarding the FIP, including discussions by City Council's joint Energy & Environment and Ad Hoc on Waste Reduction and Recycling Committees on February 20, 2013, and March 20, 2013. Sanitation conducted an open house on April 4, 2013, to accept comments on the proposed franchise zone boundaries.

On April 24, 2013, City Council approved the FIP, including the Program Goals used to develop the Proposed Project, and directed Sanitation to proceed with the CEQA process as part of the consideration by the City Council of the Proposed Project.

### 1.1.3 Project Goals and Objectives

To meet the City's Zero Waste goals, the City needs to expand services and program offerings to Commercial Establishments. To provide these expanded services and programs, City Council approved the statement of the goals and actions of the Proposed Project to efficiently and effectively introduce the new program and services. This would be accomplished by creating a simple, uniform recycling system provided by franchise holders who will become partners with the City to divert more material from landfill disposal to beneficial reuse. These 10 Project Goals encompass the major elements of the program:

1. Meet the City's Zero Waste goals by establishing the maximum disposal for each zone and implementing waste diversion programs consistent with the Solid Waste Integrated Resources Plan (SWIRP) goals (see Section 2.5.2, Solid Waste Integrated Resources Plan).
2. Meet and exceed California requirements for waste diversion and mandatory commercial and multifamily recycling.
3. Improve health and safety for Solid Resource workers under City contract provisions.
4. Improve efficiency of the City's Solid Resources system by maximizing the efficiencies of the system's waste collection route.
5. Improve the City's air quality by requiring late-model, low-emission, clean-fuel vehicles for collection fleets and using exclusive zones to optimize routes to minimize vehicle miles traveled (VMT).
6. Provide the highest level of customer service through communication and delivery of services.
7. Create a consistent, clearly defined system with fair and equitable unit rates and contingency plans to ensure reliable service.
8. Create an environment that ensures long-term competition by utilizing a Request for Proposal (RFP) process that yields the best value service template for customers and allowing no more than 49 percent of the service to any individual Franchised Hauler.
9. Ensure sufficient staffing to meet Program Goals.
10. Ensure reliable system infrastructure to provide uninterrupted service to customers.

The existing open market system limits the ability of the City to address compliance with both State mandates and the City's diversion goals.

## **1.2 PROJECT SUMMARY**

### **1.2.1 Proposed Project**

Under the Proposed Project, Franchised Waste Haulers would operate under the following conditions:

- The City would establish 11 geographical franchise collection zones. These zones would delineate the boundaries in which the Franchised Hauler would be allowed to operate.
- The City would award a Franchise Hauler the exclusive rights to operate in 1 of the 11 franchise collection zones.
- A single Franchised Hauler may be awarded more than one franchise collection zone.
- The City would establish a fair and equitable rate structure for each collection zone. The rate structure may be similar for multiple or all franchise collection zones. This rate structure would detail the rate schedule for Solid Resources collection services that Commercial Establishments will pay.
- The City would establish a formula and caps on how rates charged for Solid Resources collection services to Commercial Establishments can be increased annually.
- Under the Proposed Project, three collection streams are anticipated: Blue Bin Commingled Recyclables, Green Bin Organics, and Black Bin Solid Waste.
- Recycling services would include a blue bin system for the collection of commingled recyclables.
- Existing Organics recycling will be preserved. This includes restaurants participating in Sanitation's existing commercial food waste diversion program, existing green waste diversion from multifamily properties, and other recycling programs such as organics recycling from grocery stores. Haulers would be required, in a phased manner, to offer expanded Organics recycling as the necessary processing capacity is established.
- The City would mandate that every Commercial Establishment is provided a recycling service.
- The City would mandate maximum annual disposal levels and specific diversion requirements for each franchise zone to promote Solid Resources diversion from landfills.
- The City would mandate that all Solid Resources collection vehicles operated by the Franchised Hauler be late model, low-emission, clean-fuel vehicles.
- The City would require employees working under the franchise agreements to be paid, at a minimum, a living wage, in accordance with the City's Living Wage Ordinance.
- The Franchised Hauler would assist the City in complying with existing and new regulations.
- The Franchised Hauler would assist the City in citywide public education.
- The Franchised Hauler will provide consistent reporting on all downstream recycling activities.
- The City and the Franchised Hauler would participate in a partnership to increase diversion and identify challenges.
- New or expanded material recovery facilities (MRFs) would be needed as recycling increases under the Proposed Project.
- New or expanded facilities that support collection activities, such as transfer stations and truck base yards, would be required.
- The location and processing capacity of the new or expanded MRFs, Organics processing facilities, and the locations of transfer stations and truck base yards are not known at this time.



- The following material types will not be collected as part of the Proposed Project:
  - Construction and Demolition (C&D) Waste, debris generated from construction activities
  - Medical Waste
  - Hazardous Waste
  - Radioactive Waste
  - Pharmaceutical Waste
  - Recyclables that have value to the generator, and are sold or donated
  - Green waste removed and recycled from a site as incidental to a landscaping business
  - Other specialty waste as designated by Sanitation (e.g., biosolids, fats, oils, and grease)

The expansion of existing, or the construction of new MRFs and Organics processing facilities will be needed under the Proposed Project, as the amount of Solid Resources diverted from landfills is expected to increase over time. Although the City estimates that two new commingled “Blue Bin” MRFs and four new Organics processing facilities will eventually be needed, their locations and capacities are not known at this time. The initial implementation of the Proposed Project is not contingent on these new facilities. While it is expected that new or expanded facilities will be needed to reach the City's Zero Waste Goals, initial diversion efforts can be implemented under the Proposed Project, prior to additional facilities becoming available. Meeting the City's other Project Goals and Objectives, such as requiring late model, clean fuel, low emission vehicles, and fair and equitable rates, is not contingent on new or expanded facilities.

As the location of expanded or new facilities are not known they cannot be evaluated under this Final Program EIR at a site-specific level. Rather, new facilities are evaluated at a conceptual level. In addition, expanded or new facilities will be further addressed in the project-specific environmental documentation prepared by the lead agency for the jurisdiction in which such new or expanded facilities are located. This Final Program EIR may be used upon approval, as appropriate as a tiering document for future facilities.

### 1.2.2 Summary of Environmental Impacts and Mitigation Measures

Anticipated environmental impacts of the Proposed Project were evaluated in Section 3 of the Draft Program EIR. Feasible mitigation measures were identified in the Draft Program EIR to eliminate or substantially reduce potentially significant environmental impacts associated with the Proposed Project. These impacts and mitigation measures are summarized for each environmental topic in Table 1-2 (provided at the end of this section) of this Final Program EIR. Impacts related to Air Quality, Cultural Resources, Greenhouse Gases, and Transportation potentially would cause significant impact (including significant cumulative impacts). Impacts to other resource areas have been determined to be significant but mitigable to less than significant impact. The significant impacts as determined in this analysis would result from the construction and operation of new or expanded facilities necessary to reach the City's Zero Waste goals. The collection activities of the Proposed Project would not result in significant impacts.

### 1.2.3 Comparison of Impacts – Proposed Project and Alternatives

Section 4, Alternatives to the Proposed Project, of the Draft Program EIR describes the alternatives, evaluates potential environmental impacts of each alternative, and analyzes the ability of each alternative to meet the most of the basic objectives of the Proposed Project. The Draft Program EIR assumes a best-case scenario for all of the alternatives for purposes of the analysis, that all alternatives have the ability to achieve diversion goals similar to the Proposed Project. The alternatives are described below:

**No Project Alternative-** Under the No Project Alternative, collection of Solid Resources from Commercial Establishments would continue to occur under the existing open market system. The No Project Alternative would not accomplish the Project Goals and Objectives adopted by the City Council on April 24, 2013, as discussed in Section 1.1.3.

**Alternative 1: Non-Exclusive System-** Under Alternative 1: Non-Exclusive System, there would be a Citywide franchise agreement for the collection of Solid Resources, but there would not be franchise zones aside from the City boundaries. An unlimited number of Franchised Haulers could provide collection services, provided they meet franchise agreement terms. Franchised Haulers would set rates for the collection and diversion of Commingled Recyclables and Organics, and there would not likely be uniform rates or a certainty of customer base. As described in Section 2.1 of the Draft Program EIR, numerous overlapping collection truck routes collect Solid Resources from the same geographical areas under the open market system, and Alternative 1 would replace this system with a non-exclusive franchise system that also allows overlapping collection routes throughout the City. As a consequence, Alternative 1 would not introduce routing efficiencies. It would result in greater VMTs than the Proposed Project and would not meet the objective to improve the efficiency of the City's Solid Resources system.

**Alternative 2: Exclusive System with Multiple Franchised Haulers per Wasteshed-** Under Alternative 2: Exclusive Franchise System with Multiple Haulers, a franchise hauling system would be established with 11 franchise zones (same as Proposed Project) but would allow up to 5 Franchised Haulers (2 large and 3 small) per zone. Franchised Haulers would set rates for the collection and diversion of Commingled Recyclables and Organics, and uniform rates would be unlikely. Alternative 2 would replace the open market system of overlapping collection routes, which an exclusive franchise system that also allows up to five Franchised Haulers to service each zone. Thus, some overlapping collection routes would still occur within each zone under Alternative 2. As a consequence, this Alternative would not introduce the degree of routing efficiencies since it would result in greater VMT and more vehicle hours traveled (VHT) than the Proposed Project. Alternative 2 would not meet the objective to improve the efficiency of the City's Solid Resources system.

**Alternative 3: City Collection of All Solid Resources-** Under Alternative 3: City collection, the City would provide Solid Resources services to Commercial Establishments. Collection would occur based on the existing wastesheds. Private haulers would be excluded from performing collections. Under Alternative 3, the City would establish uniform rates. This alternative would comply with AB 341 requirements and Zero Waste Goals. Under Alternative 3, the City would purchase a new fleet collection of trucks designed for front-end collection and would provide/replace waste and recyclable receptacles/bins at all multifamily and commercial account locations because the existing ones are owned by private haulers.

#### 1.2.3.1 Impact Comparison

A comparative analysis of potential impacts was conducted for the Proposed Project and the Alternatives to the Project. The comparison of impacts by resource area is summarized in Table 1-1.

**TABLE 1-1  
COMPARISON OF ENVIRONMENTAL ISSUE AREAS BY ALTERNATIVE**

Draft EIR Section	Environmental Resource Area	Proposed Project	No Project	Alternative 1 - Non-Exclusive	Alternative 2 - Exclusive	Alternative 3 - City Control
3.2.1	Aesthetics	0	1	0	0	0
3.2.2	Agriculture	0	1	0	0	0
3.1.1	Air Quality	0	0	-1	-1	0
3.2.3	Biological Resources	0	1	0	0	0
3.1.2	Cultural Resources	0	1	0	0	0
3.2.4	Geology and Soils	0	1	0	0	0
3.1.3	Greenhouse Gases	0	+1	-2	-2	0

**TABLE 1-1**  
**COMPARISON OF ENVIRONMENTAL ISSUE AREAS BY ALTERNATIVE**

<b>Draft EIR Section</b>	<b>Environmental Resource Area</b>	<b>Proposed Project</b>	<b>No Project</b>	<b>Alternative 1 - Non-Exclusive</b>	<b>Alternative 2 - Exclusive</b>	<b>Alternative 3 - City Control</b>
3.2.5	Hazards and Hazardous Materials	0	1	0	0	0
3.2.6	Hydrology and Water Quality	0	1	0	0	0
3.2.7	Land Use and Planning	0	1	0	0	0
3.2.8	Mineral Resources	0	1	0	0	0
3.2.9	Noise	0	1	0	0	0
3.2.10	Population and Housing	0	1	0	0	0
3.2.11	Public Services	0	1	0	0	0
3.2.12	Recreation	0	1	0	0	0
3.1.4	Transportation	0	2	-1	-1	0
3.2.13	Utilities and Service Systems	0	-2	0	0	0
	<b>TOTAL</b>	<b>0</b>	<b>14</b>	<b>-4</b>	<b>-4</b>	<b>0</b>

Comparison of Impacts to Proposed Project

0 Adverse Impacts similar to Proposed Project

-1 Adverse Impacts slightly greater than Proposed Project (or beneficial impacts less than the Proposed Project).

-2 Adverse Impacts moderately greater than Proposed Project (or beneficial impacts less than the Proposed Project).

+1 Adverse Impacts slightly less than Proposed Project

+2 Adverse Impacts moderately less than Proposed Project

### **1.2.3.2 Environmentally Superior Alternative**

Based upon the analysis conducted in Section 3 of the Draft Program EIR and the comparative analysis conducted in Section 4 of the Draft Program EIR, the Proposed Project and Alternative 3 are both deemed to be Environmentally Superior Alternatives in comparison to the No Project Alternative and Alternatives 1 and 2. Section 4.3 of the Draft Program EIR provides a detailed explanation of the Environmentally Superior Alternative. The No Project Alternative is ranked the highest because it would not result in significant impacts associated with expanded or new processing facilities, transfer stations, or truck base yards.

Alternatives 1 (Non-exclusive system) and Alternative 2 (Exclusive system with multiple Franchise haulers per zone) were ranked the lowest because they would allow multiple haulers to provide service in the City or franchise zone, which would result in slightly greater air quality and GHG impacts due to higher levels of VMTs for collection of Solid Resources. Although the collection activities would not result in significant air quality or GHG impacts, the collection activities and associated difference in air quality and GHG emissions were used as a proxy to help differentiate ranking of the alternatives.

Alternative 3 was ranked the same as the Proposed Project because it would result in the same expanded or new facilities and collection activity VMTs as the Proposed Project.

CEQA requires the identification of an Environmentally Superior Alternative, other than the No Project Alternative. Therefore, based on the rankings in Table 1-1, the Proposed Project and Alternative 3 are ranked the highest, and are deemed to be Environmentally Superior.

### 1.3 ENVIRONMENTAL REVIEW PROCESS

CEQA requires state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority, prior to taking action on those projects. Additionally, a public agency is required to prepare an EIR if it determines that a proposed project has the potential to adversely affect the environment. In accordance with Section 15162 of the CEQA Guidelines, the City as the lead agency, has determined that an EIR is required for the Proposed Project.

The Draft Program EIR and this Final Program EIR, prepared in accordance with CEQA, will be used by various local and state agencies in their consideration of actions required to approve; approve with conditions or modifications; or deny the Proposed Project. This Program EIR is intended to provide the public, agencies, and decision makers with a comprehensive analysis of:

- Potential environmental consequences of the Proposed Project.
- Potential mitigation measures to avoid or reduce impacts.
- Feasible alternatives to the Proposed Project.

The level of technical detail, evaluation, and analysis provided in this Final Program EIR is consistent with CEQA and is sufficient to provide an understanding of potential impacts associated with implementation of the Proposed Project. Guidance for preparation of this document was obtained from various persons and organizations listed in Section 4 of this Final Program EIR.

#### 1.3.1 Contents of Final Program EIR

Section 15132 of the CEQA Guidelines requires that a Final Program EIR (or EIR) consist of:

- Draft EIR or a revision of the draft.
- Comments and recommendations received on the Draft EIR either verbatim or in summary.
- List of persons, organizations, and public agencies commenting on the Draft EIR.
- Responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

This Final Program EIR meets the above requirements. For a complete understanding of the Proposed Project, its potential impacts, mitigation measures, and alternatives, the reader is encouraged to review both Draft Program EIR and this Final Program EIR.

#### 1.3.2 Final Program EIR Format

This Final Program EIR is organized under the following sections:

**1.0 Introduction** – Includes an overview of the Proposed Project and the process for compliance with CEQA and preparation of the Final Program EIR.

**2.0 Clarifications and Corrections** – Includes clarifications and corrections to the Draft Program EIR.

**3.0 Comments and Responses to Comments on the Draft Program Environmental Impact Report** – Includes public and agency comments received on the Draft Program EIR and specific responses to those comments.

**4.0 Persons and Organizations Consulted** – Provides a list of the persons and organizations who were consulted during the preparation of the Final Program EIR.

**5.0 Report Preparation** – A list of people who contributed to the preparation of the Final Program EIR.

**6.0 Draft/Final Program EIR Distribution List** – A list of agencies, groups, and interested individuals who were mailed a copy of the Draft Program EIR and/or the Final Program EIR or who were notified of its availability.

## Appendices

Appendix A - Notice of Completion/Transmittal to State Clearinghouse

Appendix B - Los Angeles County Clerk Stamped Notice of Filing

Appendix C - Public Notices

### 1.3.3 Program EIR Process

The following summarizes the EIR process as it relates to the Final Program EIR for the Proposed Project:

**Notice of Preparation (NOP) /Initial Study:** A NOP of the Program EIR for the proposed ordinance was initially submitted on February 20, 2013. The NOP was received by the State Clearinghouse on February 22, 2013, and distributed to various federal, state, regional, and local government agencies. The NOP was revised and recirculated for a 30-day review period that began on February 26, 2013, and closed on March 27, 2013. Copies of the NOP, Revised NOP, and the comment letters submitted in response to the NOP are included in Appendix A of the Draft Program EIR.

**Public Scoping Meetings for NOP:** The NOP advertised seven Public Scoping meetings for interested parties to receive information on the proposed ordinance and the CEQA process, and to allow interested parties an opportunity to submit comments. The scoping meetings facilitated early consultation with interested parties in compliance with Section 15082 of the State CEQA Guidelines. Dates, times, and locations of the seven scoping meetings were as follows:

- March 4, 2013, 5:30 p.m. to 7:30 p.m. – Panorama Recreation Center, 8600 Hazeltine Avenue, Panorama City, CA 91402
- March 6, 2013, 5:30 p.m. to 7:30 p.m. – Wilmington Recreation Center (Multi-Purpose Room), 325 Neptune Avenue, Wilmington, CA 90744
- March 7, 2013, 5:30 p.m. to 7:30 p.m. – Lou Costello Recreation Center, 3141 E. Olympic Boulevard, Los Angeles, CA 90023
- March 11, 2013, 5:30 p.m. to 7:30 p.m. – South Los Angeles Sports Activity Center, 7020 S. Figueroa Street, Los Angeles, CA 90003
- March 12, 2013, 5:30 p.m. to 7:30 p.m. – Deaton Auditorium (in Police Administration Building), 100 W. 1st Street, Los Angeles, CA 90015
- March 13, 2013, 5:30 p.m. to 7:30 p.m. – Cheviot Recreation Center Auditorium, 2551 Motor Avenue, Los Angeles, CA 90064
- March 14, 2013, 5:30 p.m. to 7:30 p.m. – Granada Hills Charter High School Library, 10535 Zelzah Avenue, Granada Hills, CA 91344

**Preparation of the Draft Program EIR** – The City determined that the Proposed Project may have a significant effect on the environment and that preparation of a Program EIR would be required. The Draft Program EIR was prepared to identify, describe, and analyze potentially significant adverse environmental impacts associated with the Proposed Project. Verbal and written comments related to environmental issues that were provided during public review of the NOP and at scoping meetings were considered in the preparation of the Draft Program EIR. Section 7, Organizations and Persons Consulted, of the Draft Program

EIR lists the governmental agencies, community groups, and other organizations consulted during the preparation of the Draft Program EIR.

**Public Release of the Draft Program EIR** – The Draft Program EIR was distributed to various federal, state, regional, and local government agencies and interested organizations and individuals for a 50-calendar-day public review period, which began on November 21, 2013 and ended on January 10, 2014. The Draft Program EIR was provided to the State Clearinghouse on November 21, 2013, for distribution to additional agencies (see Appendix A). The dates of the public review period are specified on the transmittal memorandum to the State Clearinghouse accompanying the Draft Program EIR (Appendix A). The Draft Program EIR was also filed with the Los Angeles County Clerk (see Appendix B for a copy of the stamped filing).

A public Notice of Availability (NOA) of the Draft Program EIR was published in the *Los Angeles Times*, and the following local foreign-language newspapers: *La Opinion* (Spanish), *Asbarez* (Armenian), *World Journal LA* (Chinese), and the *Korea Times* (Korean). Copies of the public notices are provided in Appendix C. The Draft Program EIR was also mailed directly to interested parties who requested the document. In addition, copies of the Draft Program EIR were made available during the public review period at the following locations:

- Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Los Angeles, CA 90015
- Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Northridge Library, 9051 Darby Avenue, Northridge, CA 91325
- Encino-Tarzana Library, 18231 Ventura Blvd, Tarzana, CA 91356
- West L. A. Regional Branch Library, 11360 Santa Monica Boulevard, Los Angeles, CA 90025
- Lincoln Heights Library, 2530 Workman Street, Los Angeles, CA 90031
- Robert Louis Stevenson, 803 Spence Street, Los Angeles, CA 90023
- San Pedro Regional Branch Library, 931 S. Gaffey Street, San Pedro, CA 90731
- Van Nuys Branch Library, 6250 Sylmar Avenue, Van Nuys, CA 91401

And online at <http://www.lacitysan.org/>

Written comments on the Draft Program EIR were submitted to the address below during the public review period (to be received no later than 12:00 p.m. on January 10, 2014).

Daniel K. Meyers, Assistant Division Manager  
Solid Resources Citywide Recycling Division  
City of Los Angeles Department of Public Works  
Bureau of Sanitation  
1149 S. Broadway, 5<sup>th</sup> Floor  
Los Angeles, CA 90015

**Public Meetings** – Six public meetings were held by the City during the 50-day Draft Program EIR public review period. These meetings provided the public with an opportunity to submit written and/or provide verbal comments on the Draft Program EIR. Notifications of the public meetings were provided in the *Los Angeles Times*, *La Opinion*, *Asbarez*, *World Journal LA*, and the *Korea Times*. Copies of public notification of the meetings are provided in Appendix C of this Final Program EIR. Dates, times, and locations of the public meetings were as follows:

- Monday, December 9, 2013, 6:00pm - 7:30pm, 19040 Vanowen St. Reseda, CA
- Tuesday, December 10, 2013, 6:00pm - 7:30pm, 13520 Van Nuys Blvd., Suite 220, Pacoima, CA
- Wednesday, December 11, 2013, 6:00pm - 7:30pm, 2920 Overland Ave., Los Angeles, CA
- Thursday, December 12, 2013, 6:00pm - 7:30pm, 560 N Western Ave., San Pedro, CA



- Monday, December 16, 2013, 2:00pm – 4:00pm, City Hall, 200 N Spring St., 4th Fl. Media Room, Los Angeles, CA
- Monday, December 16, 2013, 6:00pm - 7:30pm, 7020 S Figueroa St., Los Angeles, CA

**Preparation of the Final Program EIR** – In accordance with the CEQA Guidelines, Section 15132, the Final Program EIR includes copies of the comments received on the Draft Program EIR; a list of the persons, organizations and public agencies commenting on the Draft Program EIR; responses of the City, as the Lead Agency, to the significant environmental points raised in the review and consultation process; and clarifications and corrections to the Draft Program EIR.

**Certification of Final Program EIR and Notice of Determination (NOD)** – Upon completion of the Final Program EIR, the Final Program EIR will be provided to the City Council for certification of compliance with CEQA, and for review and consideration as part of the decision-making process for the Proposed Project. The City Council will hold a public hearing to consider the certification of the Final Program EIR prior to making its decision on the Proposed Project. If the City Council certifies the Final Program EIR, City staff will prepare and file a NOD with the California State Clearinghouse and with the County Clerk within five working days of approval of the Project.

#### 1.3.4 Availability of Final Program EIR

Copies of this Final Program EIR are available for public review at the following locations:

- Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Los Angeles, CA 90015
- Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Van Nuys Branch Library, 6250 Sylmar Avenue, Van Nuys, CA 91401
- West L. A. Regional Branch Library, 11360 Santa Monica Boulevard, Los Angeles, CA 90025
- San Pedro Regional Branch Library, 931 S. Gaffey Street, San Pedro, CA 90731
- Northridge Library, 9051 Darby Avenue, Northridge, CA 91325
- Encino-Tarzana Library, 18231 Ventura Blvd, Tarzana, CA 91356
- Lincoln Heights Library, 2530 Workman Street, Los Angeles, CA 90031
- Robert Louis Stevenson, 803 Spence Street, Los Angeles, CA 90023

And online at <http://www.lacitysan.org/>

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**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Aesthetics (AES)</b>				
Proposed Project	<b>AES-1 Scenic Vista:</b> <ul style="list-style-type: none"> <li>Diversion of materials from Solid Resources collection activities would not result in development that could adversely affect a scenic resource, including scenic vistas, which form the basis for designation as a scenic highway.</li> <li>Expanded or new processing facilities could adversely affect a scenic view or vista.</li> </ul>	Potentially Significant	VR-1: Future facilities will be sited in accordance with all applicable zoning and planning restrictions. VR-2: Future facilities will include design features that allow the facility to blend in with nearby buildings. VR-3: Existing natural aesthetic features proposed for removal will be replaced. VR-4: Grading of natural and semi-natural open space will be minimized to the maximum extent. VR-5: Design features will be incorporated into the project, which effectively integrates natural aesthetics. VR-6: New utilities will be placed underground, where appropriate. VR-7: Rooftop mechanical equipment, garbage dumpsters, and other outdoor equipment will be screened from public view.	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>AES-2 Scenic Resources:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could damage a scenic resource, including trees, rock outcroppings, or historic buildings.</li> <li>• Expanded or new processing facilities could damage scenic resources.</li> </ul>	Potentially Significant	VR-1 through VR-7	Less Than Significant
	<b>AES-3 Visual Character:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could degrade the existing visual character of the areas along collection routes throughout the City and their surroundings.</li> <li>• Expanded or new processing facilities could degrade the visual character of their surroundings.</li> </ul>	Potentially Significant	VR-1 through VR-7	Less Than Significant
	<b>AES-4 Light and Glare:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development, including the placement of new lighting.</li> <li>• New lighting associated with expanded or new processing facilities could adversely affect day or nighttime views.</li> </ul>	Potentially Significant	VR-2, VR-6 and VR-7	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Agricultural Resources (AG)</b>				
Proposed Project	<p><b>AG-1 Convert Farmland to Non-Agricultural Uses:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes that could convert the isolated locations of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City of Los Angeles to non-agricultural uses.</li> <li>• Expanded or new future processing facilities could convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.</li> </ul>	Potentially Significant	<p>AG-1: Future facilities will be sited away from Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. If facilities are sited on such farmland, impacts to the farmland will be mitigated at a 1:1 ratio or through payment of fees into an agricultural conservation trust.</p> <p>AG-2: Future facilities will be sited away from lands under a Williamson Act Contract or within a Farmland Security Zone to the maximum extent.</p> <p>AG-3: Future facilities (except for composting facilities) will be sited away from areas that are zoned for agricultural use to the maximum extent possible.</p> <p>AG-4: Future facilities will be sited away from areas zoned for Timberland Production to the maximum extent. If facilities are sited on such farmland, impacts to the farmland will be mitigated at a 1:1 ratio or through payment of fees into a forest conservation trust.</p>	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>AG-2 Conflict with Agricultural Zoning or a Williamson Act Contract:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could convert farmland to non-agricultural uses.</li> <li>• Expanded or new future processing facilities could potentially affect agricultural lands subject to Williamson Act contracts.</li> </ul>	Potentially Significant	AG-1 through AG-4	Less Than Significant
	<b>AG-3 Conflict with Zoning for Forest Land:</b> <ul style="list-style-type: none"> <li>• No forest land or lands used for timber production are located within the City of Los Angeles. Future facilities could adversely affect forest land outside the City.</li> </ul>	Potentially Significant	AG-1 through AG-4	Less Than Significant
	<b>AG-4 Loss of Forest Land:</b> <ul style="list-style-type: none"> <li>• No forest land or lands used for timber production are located within the City of Los Angeles. Future facilities could adversely affect forest land outside the City.</li> </ul>	Potentially Significant	AG-1 through AG-4	Less Than Significant
	<b>AG-5 Otherwise affect Agricultural Lands or Timberlands:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could convert farmland to non-agricultural uses or forest land to non-forest uses.</li> <li>• Expanded or new future processing facilities could affect land currently zoned or used for agriculture or forest uses.</li> </ul>	Potentially Significant	AG-1 through AG-4	Less Than Significant



**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Air Quality (AQ)</b>				
	<p><b>AQ-1 Conflict with Air Quality Plan:</b></p> <ul style="list-style-type: none"> <li>Collection activities under the Proposed Project will not cause a conflict with an air quality plan.</li> <li>Facilities under the Proposed Project could result in a conflict with an air quality plan.</li> </ul>	Potentially Significant	<p>AQ-14: During the facility design phase, a review of local AQMD/APCD rules will be conducted to determine site-specific permit requirements for waste processing or handling facilities that may emit or potentially emit VOCs, particulates, CO, NOx or, SOx. Emissions of nonconventional pollutants and HAPs (Title V-Major Sources) will comply with federal and state permitting rules.</p> <p>AQ-15: Future facility applicant(s) will properly maintain ROG emission control devices within the gasoline/fueling dispensing station.</p> <p>AQ-16: Future facility applicant(s) will ensure combustion operational emissions are minimized.</p> <p>AQ-17: All diesel truck operators will strictly abide by the applicable state law requirements for idling. Idling of the primary engine will be limited to 5 minutes.</p>	Less Than Significant With Mitigation

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
			<p>AQ-18: Energy-efficient design will be provided for buildings, including automated control systems for heating, air conditioning, and energy efficiency beyond California Code of Regulations (CCR) Title 24 (California Building Standards Code) requirements, lighting controls and energy-efficient lighting in buildings, increased insulation beyond Title 24 requirements, and light-colored roof materials to reflect heat.</p> <p>AQ-19: Landscaping will be used to maximize building protection from energy-consuming environmental conditions and to shade paved areas. Such landscaping could include planting of shade trees to shade 50 percent of paved areas within 15 years and planting deciduous trees on the south- and west-facing sides of buildings.</p> <p>AQ-20: Implement measures to reduce the amount of vehicle traffic to and from future facilities. This could include provisions such as encouraging employees to rideshare or carpool to the project site, or incentives for employees to use alternative transportation.</p>	

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
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Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>AQ-2 Violate Air Quality Standard:</b> <ul style="list-style-type: none"> <li>Emission reductions would occur with implementation of the Proposed Project.</li> </ul>	Potentially Significant	<p>For facility operations: AQ-14 through AQ-20.</p> <p>For facility construction:</p> <p>AQ-1: Future facilities within the SCAQMD will prepare and implement a fugitive dust control program pursuant to the provisions of SCAQMD Rules 402 and 403 prior to any ground disturbance. For future facilities outside of the SCAQMD, adherence to any applicable fugitive dust control programs will be required.</p> <p>AQ-2: Minimize combustion emissions during construction activities.</p> <p>AQ-3: Low VOC paintings and coatings will be used on future facilities.</p> <p>AQ-4: Excavation, grading, and other construction activity will be limited to one activity or phase at a time.</p> <p>AQ-5: Hours of operation of heavy-duty equipment will be limited to a maximum of 8 hours per day, 5 days per week.</p>	Potentially Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
			<p>AQ-6: Fossil-fueled equipment will be replaced with electrically driven equivalents (provided they are not run via a portable generator set) or clean fuel options, to the maximum extent practicable.</p> <p>AQ-7: All diesel engines will be shut off when not in use to reduce emissions from idling.</p> <p>AQ-8: Curtail construction during periods of high ambient pollutant concentrations as determined by local air districts. Activities may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.</p> <p>AQ-9: Implement activity management (e.g., rescheduling activities to reduce short-term impacts) to minimize concurrent operation of construction equipment and concurrent construction of project phases.</p>	

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
			<p>AQ-10: During smog season (May through October), lengthen the construction period to minimize the vehicles and equipment operating at the same time.</p> <p>AQ-11: Minimize the obstruction of traffic on adjacent roadways.</p> <p>AQ-12: Power construction equipment with diesel engines fueled by alternative diesel fuel blends or ultra-low sulfur diesel (ULSD). Only fuels that have been certified by the ARB should be used. The ARB has verified specific alternative diesel fuel blends for NOx and PM emissions reduction. The applicant also should use ARB-certified alternative fueled (e.g., compressed natural gas, liquid natural gas [LNG], liquid propane gas, electric motors, or other ARB-certified off-road technologies) engines in construction equipment where practicable.</p> <p>AQ-13: Use construction equipment that meets the current off-road engine emission standard (as certified by the ARB) or that is re-powered with an engine that meets this standard. Tier I, Tier II, and Tier III engines have significantly less NOx and PM emissions compared to uncontrolled engines.</p>	

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
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Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>AQ-3 Cumulative Increase in Criteria Pollutant:</b> <ul style="list-style-type: none"> <li>Overall emissions are estimated to drop as a result of the Proposed Project.</li> </ul>	Potentially Significant	AQ-1 through AQ-21	Potentially Significant
	<b>AQ-4 Sensitive Receptor Exposure:</b> <ul style="list-style-type: none"> <li>Sensitive receptors will not be exposed to air pollutants.</li> </ul>	Potentially Significant	AQ-1 through AQ-20	Potentially Significant
	<b>AQ-5 Objectionable Odors:</b> <ul style="list-style-type: none"> <li>Sensitive receptors will not be exposed to objectionable odors from the Proposed Project.</li> </ul>	Potentially Significant	AQ-21: An odor analysis will be prepared as part of future project-specific air quality analysis. Should the odor analysis identify the potential for impacts, the facility will incorporate odor-reducing design features. Such features could include, but are not limited to: <ul style="list-style-type: none"> <li>Provision of exhaust fans to provide multiple air exchanges every hour'</li> <li>Treatment of air leaving the building by an odor neutralizing misting system' and</li> <li>Maintaining negative pressure at the building entrances to minimize the amount of untreated air leaving the building.</li> </ul>	Less Than Significant



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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
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Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Biological Resources (BIO)</b>				
Proposed Project	<b>BIO-1 Threatened or Sensitive Species:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development or physical changes that could damage or otherwise modify habitat that supports candidate, sensitive, or special status species.</li> <li>• Expanded or new processing facilities sited on undisturbed lands could result in adverse impacts directly or to habitat that supports candidate, sensitive or special status species.</li> </ul>	Potentially Significant	<p>BIO-1: A qualified Biologist will conduct a habitat assessment to evaluate the site's potential to support special status plant and wildlife species and jurisdictional wetlands/waters.</p> <p>BIO-2: Prior to commencement of any earth-moving activities, the Lead Agency will conduct the appropriate focused survey(s) to determine the presence or absence of special status species (i.e., plant and/or wildlife surveys) that could be significantly impacted by the Proposed Project. If special status species are identified on or adjacent to the facility site, then appropriate avoidance and/or mitigation measures will be implemented, as approved by the resource agencies with jurisdiction over that species.</p>	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>BIO-2 Riparian Habitat:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development, and would not occur in a manner that could adversely affect riparian habitat or other sensitive natural communities.</li> <li>• Expanded or new processing facilities could adversely affect riparian habitat or other sensitive natural communities.</li> </ul>	Potentially Significant	BIO-1 and BIO-2	Less Than Significant
	<b>BIO-3 Wetlands:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development, and would not occur in a manner that could adversely affect wetlands.</li> <li>• Expanded or new processing facilities could adversely affect wetlands.</li> </ul>	Potentially Significant	BIO-1 and BIO-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>BIO-4 Wildlife Migration:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development, and would not occur in a manner that could physically impede the movement of wildlife species or the migration of wildlife through wildlife corridors.</li> <li>• Expanded or new processing facilities could interfere with the movement of any wildlife species or with movement along wildlife corridors or otherwise impede the use of native wildlife nursery sites.</li> </ul>	Potentially Significant	BIO-1, BIO-2, and: BIO-3: All project-related ground-disturbing activities will comply with all applicable federal, state, regional, and local biological resource protection regulations in order to avoid and/or minimize potential impacts to biological resources including, but not limited to, use of BMPs during construction and in the design of project facilities; protection of native trees as required by local tree ordinances; and pre-construction nesting bird surveys and nesting raptor surveys (if appropriate based on season and habitat present) in compliance with the Migratory Bird Treaty Act and/or California Department of Fish and Wildlife regulations.	Less Than Significant
	<b>BIO-5 Local Policies or Ordinances Protecting Resources:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could affect protected trees, and would occur in already developed areas devoid of protected trees.</li> <li>• Expanded or new processing facilities could potentially damage or require removal of protected trees.</li> </ul>	Potentially Significant	BIO-3	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>BIO-6 Conservation Plans:</b> <ul style="list-style-type: none"> <li>The diversion of materials from the Solid Resources collection activities would not result in development and would not occur in areas under a habitat management plan or a natural community conservation plan.</li> <li>Expanded or new processing facilities are not expected to conflict with a habitat management plan or natural community conservation plans.</li> </ul>	Less Than Significant	None Required	Less Than Significant
<b>Cultural Resources (CUL)</b>				
Proposed Project	<b>CUL-1 Historical Resources:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could damage or otherwise adversely affect a historic resource.</li> <li>Expanded or new processing facilities could potentially damage, demolish, or otherwise adversely affect historic resources.</li> </ul>	Potentially Significant	<del>CR-4</del> CR-4: Prior to development, the project applicant will employ a cultural resource professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History to determine if the project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. The cultural resource professional in conjunction with the Lead Agency will determine if any significant historical resources would be adversely affected by the proposed development.	Potentially Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>CUL-2 Archaeological Resources:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could damage or otherwise adversely affect an archaeological resource.</li> <li>• Construction of new or expanded processing facilities could potentially encounter or damage archaeological resources.</li> </ul>	Potentially Significant	<p><del>CR-2</del> CR-1: Future developments that could result in earth-disturbing activities within native sediments with the potential for producing archaeological materials, or projects located near known cultural resources, will implement the following:</p> <ol style="list-style-type: none"> <li>1. Prior to commencement of any earth-disturbing activities, a Phase 1 study will be undertaken to evaluate the current conditions of a project site.</li> <li>2. If archaeological sites or resources are discovered as a result of the Phase I study, a Phase II study of the significance of any prehistoric material that is present will be undertaken.</li> <li>3. If the Phase II study indicates that a significant site is present, the qualified Archaeologist will determine appropriate actions, in cooperation with the Lead Agency, for preservation and/or data recovery of the resource.</li> <li>4. Monitoring of ground-disturbing activities will be undertaken by a qualified Archaeologist as a final mitigation measure in areas that contain or are sensitive for the presence of cultural resources.</li> </ol>	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>CUL-3 Paleontological Resources:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could damage or otherwise adversely affect a unique geologic resources or paleontological resource.</li> <li>• Construction of new or expanded processing facilities could encounter or damage paleontological resources.</li> </ul>	Potentially Significant	<p><del>CR-3</del> <b>CR-2:</b> For future development that could result in disturbances to sites that might contain paleontological resources, implement the following:</p> <ol style="list-style-type: none"> <li>1. Prior to any earth-disturbing activities, conduct an archival records search at an appropriate institution to determine the depositional environment within the project area and to evaluate the likelihood of fossils being present.</li> <li>2. Conduct a field survey prior to ground-disturbing activities in areas of potential but unknown sensitivity to evaluate the site for the presence of significant fossil resources and to establish the need for paleontological salvage and/or monitoring.</li> <li>3. If significant fossils are discovered, a qualified Paleontologist and Lead Agency will determine appropriate actions for the preservation and/or salvage of the resource.</li> <li>4. Monitoring activities will be accomplished by a qualified Paleontologist.</li> <li>5. A qualified Paleontologist will prepare collected specimens to the point of identification and curate the specimens.</li> <li>6. Document actions in a technical report prepared by a qualified Paleontologist.</li> </ol>	Less Than Significant

**TABLE 1-2  
SUMMARY OF ENVIRONMENTAL EFFECTS  
EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>CUL-4 Human Remains:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could encounter interred human remains.</li> <li>• Construction of the new or expanded processing facilities could encounter interred human remains.</li> </ul>	Potentially Significant	<p><del>CR-4</del> <u>CR-3</u>: If human remains are encountered, no further excavation or disturbance of the site or any nearby will occur until the County Coroner has determined the appropriate treatment and disposition of the human remains consistent with Section 7050.5 of the California Health and Safety Code. If remains are determined by the Coroner to be of Native American origin, the Coroner must notify the NAHC within 24 hours, which in turn must identify the person or persons it believes to be the most likely descended from the deceased Native American, in compliance with Section 5097.98 of the Public Resources Code. The descendants will complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.</p>	Less Than Significant

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Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Geology and Soils (GEO)</b>				
Proposed Project	<b>GEO-1 Earthquake Faults:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could expose people to injury or risks associated with earthquake faults.</li> <li>Construction of the new or expanded processing or other facilities could result in potential impacts related to proximity to active mapped faults.</li> </ul>	Potentially Significant	GS-1: Future new or expanded facilities will not be located within a mapped Alquist-Priolo Earthquake Fault Zone. Placement of structures for human occupancy will be restricted from areas designated as an Alquist-Priolo Earthquake Fault Zone.	Less Than Significant
	<b>GEO-2 Seismic Ground Shaking:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could expose people to injury or risks associated with strong seismic ground shaking.</li> <li>New or expanded processing or other facilities could result in potential impacts related to seismic ground shaking.</li> </ul>	Potentially Significant	GS-2: During facilities planning, site-specific geotechnical reports will be prepared. Mitigation measures and design recommendations identified in the site-specific reports will be implemented.	Less Than Significant
	<b>GEO-3 Seismic-Related Ground Failure:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could expose people to injury or risks associated with seismic-related ground failure, including liquefaction.</li> <li>New or expanded processing or other facilities could result in potential impacts related to seismic-related ground failure (including liquefaction).</li> </ul>	Potentially Significant	GS-2 and; GS-3: Future new or expanded facilities will not be located within an area known for or designated with a high liquefaction potential. Placement of structures for human occupancy will be restricted from areas known for ground failure or liquefaction.	Less Than Significant



**TABLE 1-2  
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EXCLUSIVE FRANCHISE SYSTEM**

<b>Resource Areas and Alternatives</b>	<b>Environmental Impacts</b>	<b>Significance Determination</b>	<b>Mitigation Measures*</b>	<b>Impact after Mitigation</b>
	<b>GEO-4 Landslides:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could expose people to injury or risks associated with landslides, or slope failures.</li> <li>• New or expanded processing or other facilities could result in potential impacts related to geologic hazards, including landslides.</li> </ul>	Potentially Significant	GS-4: Future new or expanded facilities will not be located in areas mapped as a landslide or mudslide hazard area in local planning documents (e.g., General Plans).	Less Than Significant
	<b>GEO-5 Loss of Topsoil:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could cause substantial soil erosion or the loss of top soil.</li> <li>• New or expanded processing or other facilities are not expected to result in significant impacts related to soil erosion of top soil.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>GEO-6 Unstable Geologic Unit:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development on unstable geologic units or unstable soil that could result in additional geologic impacts such as landslides, lateral spreading, subsidence, or collapse.</li> <li>• New or expanded processing or other facilities could result in potential impacts related to unstable geologic conditions.</li> </ul>	Potentially Significant	GS-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>GEO-7 Expansive Soil:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development that could be affected by expansive soil conditions.</li> <li>• New or expanded processing or other facilities could result in potential impacts related to expansive soils.</li> </ul>	Potentially Significant	GS-2	Less Than Significant
	<b>GEO-8 Alternative Wastewater Disposal Systems:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in physical changes or new development, including septic systems or alternative wastewater disposal systems.</li> <li>• New or expanded processing or other facilities are not expected to result in significant impacts related to alternative wastewater disposal systems, including septic systems.</li> </ul>	Less Than Significant	None Required	Less Than Significant
<b>Greenhouse Gases (GHG)</b>				
	<b>GHG-1 Greenhouse Gas Emissions:</b> <ul style="list-style-type: none"> <li>• The Proposed Project would not have a substantial adverse effect by generating greenhouse gas emissions that could have a significant impact on the environment.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>GHG-2 Conflict With Plan or Policy:</b> <ul style="list-style-type: none"> <li>• The Proposed Project would not conflict with or obstruct the implementation of the applicable plan, policy, or regulation.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Hazards and Hazardous Materials (HAZ)</b>				
Proposed Project	<b>HAZ-1 Transport, Use, or Disposal of Hazardous Materials:</b> <ul style="list-style-type: none"> <li>Hazardous materials such as lubricants and solvents to maintain fleets would be used at fleet yards in compliance with applicable laws and regulations governing their use, storage, transport, and disposal.</li> <li>Compliance with applicable laws and regulations regarding storage of hazardous materials at new or expanded processing or other facilities would minimize the potential for accidental releases at new or expanded processing facilities.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>HAZ-2 Release of Hazardous Materials:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not involve the collection or transport of hazardous materials.</li> </ul> Compliance with applicable laws and regulations regarding storage of hazardous materials would minimize the potential for accidental releases at new or expanded processing or other facilities.	Less Than Significant	None Required	Less Than Significant
	<b>HAZ-3 Hazardous Emissions Near Schools:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not involve the use or processing of materials that could emit hazardous materials or emissions during collection activities.</li> <li>Processing of recyclable or Organics at new or expanded processing facilities is not expected to emit hazardous emissions, including hazardous emissions within one-quarter mile of a public school.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>HAZ-4 Hazardous Materials Sites:</b> <ul style="list-style-type: none"> <li>Collection activities would not create a significant hazard to the public or the environment by disturbing hazardous materials sites.</li> <li>Future materials processing facility capacity could be located at a hazardous materials site that could create a significant hazard to the public or the environment.</li> </ul>	Potentially Significant	HAZ-1: Prior to siting waste facilities, a Phase I Environmental Site Assessment (ESA) will be conducted in conformance with industry-accepted practices, American Society of Testing Materials (ASTM) Designation E1527-05, and the EPA All Appropriate Inquiry Rule.	Less Than Significant

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**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>HAZ-5 Safety Hazards - Airport Land Use Plan:</b></p> <ul style="list-style-type: none"> <li>Collection activities could occur from establishments within 2 miles of a public airport, but would occur at ground level and would not pose a threat to flight safety or result in hazards to people working or residing in the vicinity of an airport.</li> <li>New processing facility capacity and other facilities could result in hazards to people working or residing in the vicinity of an airport, depending on site locations.</li> </ul>	Potentially Significant	<p>HAZ-2: If future facilities are sited within an area governed by an airport land use plan or within 2 miles of a public or private airport, analysis will be undertaken to assess if the proposed facility would result in any impacts to airport operations or if it would subject people to a significant risk due to airport operations. If potential impacts are identified, a different site will be selected or mitigation measures will be implemented during the project-level environmental analysis to reduce the potential impact to airport operations to below a level of significance. Such mitigation measures could include maintaining certain percentages of low-occupancy areas (e.g., undeveloped areas, parking areas), building heights and building lights.</p>	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>HAZ-6 Safety Hazards – Private Airstrip:</b> <ul style="list-style-type: none"> <li>Collection activities could occur from establishments within the vicinity of a private airport, but would occur at ground level and would not pose a threat to flight safety or result in hazards to people working or residing in the their vicinity.</li> <li>New processing facility capacity and other facilities could result in hazards to people working or residing in the vicinity of a private or public facility airport.</li> </ul>	Potentially Significant	HAZ-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>HAZ-7 Emergency Response or Evacuation:</b></p> <ul style="list-style-type: none"> <li>Collection vehicles would use existing transportation infrastructure, would not block streets, highways, or freeways, and are not expected to impair implementation or physically interfere with emergency response or evacuation plans or activities.</li> <li>New materials processing and other facilities capacity would not be located in a manner that would block or impair transportation on streets and highways that could be used for emergency response or evacuation activities.</li> <li>Hazardous materials inventory documentation and business emergency plans may need to be updated for emergency response purposes.</li> </ul>	Potentially Significant	<p>HAZ-3: Upon approval of future facilities, an applicable community emergency plan will be developed, reviewed, and updated, as needed, to account for new waste facilities and updated routes for the transportation of hazardous wastes.</p> <p>HAZ-4: Future facilities will provide barriers, as needed, to contain hazardous materials.</p> <p>HAZ-5: At future facilities, hazardous substances will be stored away from site boundaries.</p> <p>HAZ-6: A Health and Safety Plan will be developed in accordance with local, state, and federal occupational health regulations.</p> <p>HAZ-7: Spill containment measures will be developed and implemented onsite for any new facility.</p>	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>HAZ-8 Wildland Fires:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would occur in the largely urbanized areas of the City and are not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</li> <li>• New materials processing and other facilities capacity could expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</li> </ul>	Potentially Significant	HAZ-8: A Fire Safety Plan will be developed for use during construction and operation of any new facility.	Less Than Significant



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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Hydrology and Water Quality (WQ)</b>				
Proposed Project	<b>WQ-1 Water Quality Standards:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in discharges within the watersheds that could violate water quality standards or waste discharge requirements.</li> <li>• Potential discharges from future new or expanded handling facilities could violate water quality standards or waste discharge requirements.</li> </ul>	Potentially Significant	<p>WQ-1: During facilities planning, a project-specific water quality study will be prepared to address impacts on water quality and identify BMPs or measures to mitigate water quality impacts and ensure that water quality standards are not violated.</p> <p>WQ-2: A construction Stormwater Pollution Prevention Plan (SWPPP) will be prepared, in accordance with the State General Construction Permit. Comply with the General Industrial Activities Stormwater Permit, which requires development and implementation of operational SWPPPs to control discharges from industrial sites.</p> <p>WQ-3: BMPs into site design that address source control, and treatment. Low Impact Development design features required by jurisdictions shall be implemented to address water quality concerns through the use of multiple sustainable BMP alternatives at the local level.</p>	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>WQ-2 Groundwater:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in the extraction of groundwater or the placement of impervious surfaces upon established groundwater recharge areas.</li> <li>• Local permitting processes would prevent new facilities from encroaching on designated groundwater recharge areas, and water needed for operation of new processing capacity would not likely be obtained through local groundwater extraction.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>WQ-3 Erosion:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in alterations to existing drainage patterns, would not affect streams or rivers, and would not cause erosion or siltation.</li> <li>• Expanded or new materials handling or other facilities could potentially alter existing drainage patterns or alter the course of a stream or river in a manner that could cause erosion.</li> </ul>	Potentially Significant	WQ-4: Future facilities will include the construction of new or improved stormwater management facilities to reduce or retard the amount of peak runoff from the facility sites. WQ-5: Future facilities will reduce impervious surfaces and materials and maximize landscaped and natural areas.	Less Than Significant
	<b>WQ-4 Flooding:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in alternations to existing drainage patterns, or affect streams or rivers that could in turn result in flooding.</li> <li>• Expanded or new materials handling or other facilities could alter existing drainage patterns or the course of a stream or river in a manner that could cause flooding.</li> </ul>	Potentially Significant	WQ-4 and WQ-5	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>WQ-5 Storm Drain Capacity / Runoff Quality:</b> <ul style="list-style-type: none"> <li>Diversion of materials from the Solid Resources collection activities would not create or contribute to runoff within the City, and would therefore not adversely affect stormwater conveyance capacity or runoff quality.</li> <li>Expanded or new materials handling or other facilities could contribute to runoff flows that exceed the capacity of existing storm drains.</li> </ul>	Potentially Significant	WQ-4, WQ-5, and WQ-6: A project-specific drainage study that evaluates existing drainage facility capacity, project flows and develop alternatives will be prepared to safely convey site runoff under design storm conditions without overburdening the drainage system.	Less Than Significant
	<b>WQ-6 Water Quality Degradation:</b> <ul style="list-style-type: none"> <li>The Proposed Project would not otherwise substantially degrade water quality</li> </ul>	No Impact	None Required	No Impact
	<b>WQ-7 Housing in Flood Hazard Areas:</b> <ul style="list-style-type: none"> <li>The Proposed Project would not result in the placement of any housing within a 100-year flood hazard area.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>WQ-8 Structures that Could Impede Flood Flows:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in the development of any new structures.</li> <li>Expanded or new materials handling or other facilities could impede or redirect flood flows.</li> </ul>	Potentially Significant	<p>WQ-7: For future facilities proposed in a floodplain, a floodplain study will be prepared to address FEMA or jurisdictional floodplain management requirements. The study will identify feasible measures to meet FEMA water surface elevation requirements. These measures will be implemented as part of the facility design and/or construction.</p> <p>WQ-8: Future facilities will be designed so that structures and other important facilities that would be adversely affected by flooding are no longer located within flood hazard areas.</p> <p>WQ-9: Future facilities will raise the building pad or ground floor of proposed structures to an elevation above flood prone areas.</p>	Less Than Significant
	<b>WQ-9 Expose People to Flood Hazards:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in the development of any new structures or housing.</li> <li>Development of handling/processing or other facilities would not expose people or structures to significant flood hazard risks.</li> </ul>	Less Than Significant	None Required	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>WQ-10 Inundation by Seiche, Tsunami, or Mudflow:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in development subject to inundation by seiches, tsunamis, or mudflows.</li> <li>Development of handling/processing or other facilities would not result in significant impacts related to a seiche, tsunami, or mudflow.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Land Use and Planning (LU)</b>				
Proposed Project	<b>LU-1 Physically Divide An Established Community:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could physically divide an established community.</li> <li>• Expanded or new processing or other facilities would be located on lands zoned for industrial commercial-manufacturing, or agricultural uses and would not physically divide an established community.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2  
SUMMARY OF ENVIRONMENTAL EFFECTS  
EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>LU-2 Conflicts with Land Use Plans:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could conflict with the General Plan.</li> <li>• Siting of the expanded or new processing or other facilities could result in conflicts with the applicable General Plan or the zoning designation of the future sites or conflict with nearby uses.</li> </ul>	Potentially Significant	<p>LU-1: Future facilities will be sited in locations that support the appropriate General Plan and Zoning designations for the use being proposed.</p> <p>LU-2: Future facilities will be fully enclosed to the maximum extent practicable to minimize nuisance issues. If a nuisance is found to occur as result of facility operations, certain restrictions on the operational characteristics of the facility will be implemented to reduce or eliminate impacts, such as limiting hours of operation or placing restrictions on specific types of uses or activities proposed for the facility.</p> <p>LU-3: Project design, configuration, visual screening, setbacks, building heights, etc., will be compatible with surrounding uses.</p>	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>LU-3 Conflicts with Conservation Plan:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development and would not occur in areas under a habitat management plan or natural community conservation plan.</li> <li>• Siting of the expanded or new processing or other facilities could potentially conflict with a habitat management plan or natural community conservation plan.</li> </ul>	Potentially Significant	LU-1 through LU-3	Less Than Significant
<b>Mineral Resource (MR)</b>				
	<b>MR-1 Loss of Mineral Resource Availability of Statewide Importance:</b> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could result in loss of availability of mineral resources.</li> <li>• Siting of expanded or new materials processing or other facilities could adversely affect availability of mineral resources.</li> </ul>	Potentially Significant	MR-1: Future facilities will be sited so as to avoid areas mapped as MRZ-2, MRZ-3, and MRZ-3a by the California Mineral Land Classification System. MR-2: Future facilities will be sited so as to avoid active oil, gas or geothermal operations. MR-3: Future facilities will be sited so as to avoid area mapped as locally important mineral resources on general plans, specific plans, or other land use plans. MR-4: Easements will be established, when necessary, to preserve possible future use of mineral resources.	Less Than Significant



**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>MR-2 Loss of Mineral Resource Availability of Local Importance:</b></p> <ul style="list-style-type: none"> <li>• Diversion of materials from the Solid Resources collection activities would not result in development that could result in loss of availability of mineral resources.</li> <li>• Siting of expanded or new materials processing or other facilities could adversely affect availability of locally important mineral resources</li> </ul>	Potentially Significant	MR-1 through MR-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Noise (NOI)</b>				
	<b>NOI-1 Generate Noise Levels Exceeding Applicable Standards:</b> <ul style="list-style-type: none"> <li>Collection activities under the Proposed Project would not result in substantively increased noise levels that could result in an exceedence of recommended General Plan noise levels.</li> <li>Operations of future new processing capacity could result in elevated noise levels that also exceed applicable General Plan noise standards.</li> </ul>	Potentially Significant	<p>N-1: A noise study will be prepared for future facilities that quantifies the facility's noise contribution to the ambient environment for both the construction and operation phase. If impacts are identified, measures will be implemented to reduce sound levels to a level that is consistent with the applicable jurisdiction's noise ordinance or noise element.</p> <p>N-7: Operational activities at future facilities will not produce noise levels at the property line that exceed the levels identified in the applicable jurisdiction's noise ordinance. Implement noise attenuation measures to reduce the operational noise level at the property line noise levels to the applicable community noise standard level.</p>	Less than Significant
	<b>NOI-2 Groundborne Vibration and Noise:</b> <ul style="list-style-type: none"> <li>Collection activities under the Proposed Project are not expected to substantively or noticeably change the existing levels of groundborne noise or groundborne vibration any area of the City.</li> <li>New processing capacity is not expected to result in excessive groundborne vibration or groundborne noise levels.</li> </ul>	Less Than Significant	None Required	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>NOI-3 Permanent Increase in Ambient Noise Levels:</b></p> <ul style="list-style-type: none"> <li>Changes in collection activity trips relative to baseline would be minor and would not approach a doubling of the existing traffic; and therefore, would not substantively or noticeably change the existing noise levels (CNEL) in any area of the City.</li> <li>Future new processing capacity could result in elevated noise levels that could permanently increase noise levels in the vicinity of sensitive receptors.</li> </ul>	Potentially Significant	NOI-1 and NOI-7	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<p><b>NOI-4 Temporary Increase in Ambient Noise Levels:</b></p> <ul style="list-style-type: none"> <li>Short-term elevations in noise related to materials transfer from bins to collection vehicles would not represent a substantial temporary or periodic increase in ambient community noise levels.</li> <li>Construction of future new processing or other facilities could result in elevated noise levels that could temporarily increase noise levels in the vicinity of sensitive receptors.</li> </ul>	Potentially Significant	<p>NOI-1 and:</p> <p>N-2: Construction activities will be limited to 7:00 AM to 7:00 PM, Monday through Saturday. If the local jurisdiction has more stringent construction timing limits, those limits will be applied.</p> <p>N-3: The construction contractor will operate and maintain a City-approved haul truck traffic route along major traffic arteries.</p> <p>N-4: All construction equipment will be equipped, operated, and maintained with manufacturer-recommended mufflers or the equivalent.</p> <p>N-5: Mobile and stationary construction equipment will be turned-off when not in operation.</p> <p>N-6: All stationary noise-generating construction equipment will be located as far as possible from nearby noise-sensitive receptors. Noise-generating equipment will be shielded from nearby noise sensitive receptors by noise-attenuating buffers.</p>	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>NOI-5 Excessive Noise Levels in Airport Land Use Plan Areas:</b> <ul style="list-style-type: none"> <li>Collection would not result in changes in airport noise contours.</li> <li>Expanded or new materials handling and processing or other facilities could expose people to excessive noise if located in noise airport noise contours.</li> </ul>	Potentially Significant	N-1 and: N-8: For future facilities within 2 miles of a public or private airport, the project-specific noise study will include address excessive noise levels due to airport noise, and develop measures to reduce interior noise levels to acceptable levels.	Less Than Significant
	<b>NOI-6 Excessive Noise Levels Near Private Airstrips:</b> <ul style="list-style-type: none"> <li>Collection would not result in changes in airport noise contours.</li> <li>Expanded or new materials processing or other facilities could expose people to excessive noise if located close to private airports.</li> </ul>	Potentially Significant	N-1 and N-8	Less Than Significant
<b>Population and Housing (PH)</b>				
	<b>PH-1 Population Growth:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in residential development that could in turn induce population growth.</li> <li>New or expanded processing or other facilities would not include a residential component that could induce population growth.</li> </ul>	Less Than Significant	None Required	Less Than Significant

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**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>PH-2 Displace Housing:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in removal or displacement of any housing.</li> <li>New or expanded processing or other facilities could displace housing.</li> </ul>	Potentially Significant	PH-1: If future new or expanded facilities result in the displacement of existing residential units or persons, appropriate compensation to property owners or relocation of displaced people will occur.  PH-2: If acquisition of public or private residences are necessary for construction of future new or expanded facilities, all applicable federal, state, and local laws regarding acquisition of property, compensation to displaced property owners or tenants, and relocation assistance and benefits for persons who may be displaced will be adhered to or exceeded, as appropriate.	Less Than Significant
	<b>PH-3 Displace People:</b> <ul style="list-style-type: none"> <li>Collection activities are not expected to result in removal or displacement of people.</li> <li>New or expanded processing or other facilities could potentially displace housing or people.</li> </ul>	Potentially Significant	PH-1 and PH-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Public Services (PS)</b>				
	<b>PS-1 Fire Protection Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development that could increase demand for fire protection services.</li> <li>Compliance with applicable sections of the Fire Code and the California Fire Code during the building permit process and payment of development impact fees is expected to keep future processing facilities from resulting in the need for new or expanded physically altered fire protection facilities.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>PS-2 Police Protection Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development that could increase demand for police protection services.</li> <li>New or expanded processing or other facilities would likely be added in areas already within established police service areas; and payment of development impact fees to are expected to minimize demand for police services.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>PS-3 Schools:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development that could increase demand for school services.</li> <li>New or expanded processing or other facilities would not substantively increase demand for school services.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>PS-4 Park Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development that could substantively increase demand for park or recreational facilities.</li> <li>New or expanded processing or other facilities would not substantively increase demand for or provision of new or expanded park facilities.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>PS-5 Other Public Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development that could substantively increase demand for other public facilities.</li> <li>New or expanded processing or other facilities would not substantively increase demand for other public services.</li> </ul>	Less Than Significant	None Required	Less Than Significant
<b>Recreation (REC)</b>				
	<b>REC-1 Physical Deterioration of Recreational Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in development that could increase the use of existing neighborhood and regional parks, or otherwise cause deterioration of existing recreational facilities.</li> <li>New or expanded processing or other facilities on industrial or commercial-manufacturing lands is not expected to increase the use of existing neighborhood and regional parks, or otherwise cause deterioration of existing recreational facilities.</li> </ul>	Less Than Significant	None Required	Less Than Significant



**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>REC-2 Construction of New or Expanded Recreational Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development, including the construction or expansion of recreational facilities.</li> <li>New or expanded processing or other facilities could adversely affect existing recreational facilities.</li> </ul>	Potentially Significant	REC-1: If future new or expanded facilities are located on a site that results in an impact to existing recreation facilities, replacement recreation facilities will be acquired or constructed prior to demolition of existing recreational facilities.	Less Than Significant
<b>Traffic (TRA)</b>				
	<b>TR-1 Conflict with Plan, Ordinance or Policy:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development, including the construction or expansion of transportation facilities.</li> <li>Trips associated with new or expanded processing or other facilities could result in conflicts with applicable transportation plans.</li> </ul>	Potentially Significant	TR-1: Prior to the approval of any future facility, a project-level traffic impact report will be prepared by a qualified traffic consultant. The traffic report will identify mitigation measures to reduce project- and cumulative-level impacts to the maximum extent practicable.	Potentially Significant
	<b>TR-2 Conflict with Congestion Management Plan:</b> <ul style="list-style-type: none"> <li>Collection activities would not cause a conflict with a congestion management plan.</li> <li>Trips associated with new or expanded processing or other facilities could result in conflicts with applicable congestion management plan.</li> </ul>	Potentially Significant	TR-1	Potentially Significant
	<b>TR-3 Change in Air Traffic Patterns:</b> <ul style="list-style-type: none"> <li>The Proposed Project would not cause a conflict with air traffic patterns.</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>TR-4 Increase Hazards:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development, including the construction or expansion of transportation facilities.</li> <li>Local transportation agency review of new or expanded processing or other facilities would ensure proper design principles that avoid transportation hazards.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>TR-5 Inadequate Emergency Access:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development, including the construction or expansion of transportation facilities.</li> <li>Local transportation agency review of new or expanded processing or other facilities would ensure proper design principles that ensures adequate emergency access</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>TR-6 Conflict with Public Transit, Bicycle or Pedestrian Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in any development, including the construction or expansion of transportation facilities.</li> <li>Local transportation agency review of new or expanded processing or other facilities would prevent impacts to alternative transportation</li> </ul>	Less Than Significant	None Required	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Utilities (UT)</b>				
	<b>UT-1 Exceed Wastewater Treatment Requirements of the Applicable RWQCB:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in generation of wastewater that could result in exceedences of wastewater treatment requirements of the applicable Regional Water Quality Control Board.</li> <li>Within the City, wastewater generated by new processing capacity is not expected to result in exceedences of wastewater treatment requirements of the Regional Water Quality Control Board. Outside the City, wastewater treatment requirements would be subject to the applicable RWQCB</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>UT-2 Require New Wastewater Treatment Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities under the Proposed Project would not result in the need to construct new or expanded water or wastewater treatment facilities.</li> <li>The City has developed a wastewater facilities plan to ensure that adequate treatment capacity is available (City of Los Angeles, 2006). The DWP has adequate water supplies to accommodate the water demand within the City for the 25-year planning horizon under the Urban Water Management Plan (UWMP). Outside the City, new or expanded facilities could contribute to the need for new water or wastewater treatment facilities.</li> </ul>	Potentially Significant	UT-1: Future processing facilities will incorporate water conservation design features. UT-2: Development applications for future new facilities greater than 40 acres of land, having more than 650,000 square feet of floor area, or employing more than 1,000 persons will include a water supply assessment.	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>UT-3 Require New Storm Water Drainage Facilities:</b> <ul style="list-style-type: none"> <li>Collection activities would not create or contribute to runoff within the City and would not result in the need to construct new or expanded storm drainage facilities.</li> <li>New or expanded material handling facilities could be expected to substantially contribute to runoff that could exceed the capacity of existing or planned stormwater drainage systems.</li> </ul>	Potentially Significant	WQ-4, WQ-5, and WQ-6	Less Than Significant
	<b>UT-4 Water Supplies:</b> <ul style="list-style-type: none"> <li>Collection activities are not expected to increase water use or result in the need to secure new water supplies.</li> <li>The City's DWP has adequate water supplies through the 25-year planning period of the 2010 UWMP, water usage from new processing facilities is not expected to require new or expanded water entitlements. Outside the City, new or expanded facilities could result in the need to secure new water supplies</li> </ul>	Potentially Significant	UT-1 and UT-2	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
	<b>UT-5 Wastewater Treatment Capacity:</b> <ul style="list-style-type: none"> <li>Collection activities would not result in discharges of wastewater, or any development that could discharge wastewater.</li> <li>Small amounts of wastewater would be generated by new processing capacity, but there is adequate wastewater treatment capacity within the City's treatment plant service areas to accommodate wastewater flows. New or expanded facilities outside the City could necessitate the construction of new water or wastewater treatment facilities, or expansion of existing facilities, which could cause significant environmental effects.</li> </ul>	Potentially Significant	UT-1 and UT-2	Less Than Significant
	<b>UT-6 Landfill Capacity:</b> <ul style="list-style-type: none"> <li>Source-separated recyclables and Organics would be collected and diverted from solid waste landfills thereby prolonging remaining landfill capacity.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>UT-7 Solid Waste Regulations:</b> <ul style="list-style-type: none"> <li>The Proposed Project implements solid waste reduction policies, goals, and requirements put forth in state and local laws, ordinances, and plans, and would therefore be in compliance with solid waste regulations.</li> </ul>	Less Than Significant	None Required	Less Than Significant
	<b>UT-8 Energy:</b> <ul style="list-style-type: none"> <li>The Proposed Project is not expected to require new (offsite) energy supply facilities but could require energy conservation measures in the project design and/or facility operations.</li> </ul>	Potentially Significant	UT-3: Future new or expanded materials processing facilities, transfer stations, and truck base yards shall be required to incorporate energy efficient design features.	Less Than Significant

**TABLE 1-2**  
**SUMMARY OF ENVIRONMENTAL EFFECTS**  
**EXCLUSIVE FRANCHISE SYSTEM**

Resource Areas and Alternatives	Environmental Impacts	Significance Determination	Mitigation Measures*	Impact after Mitigation
<b>Cumulative Impacts</b>				
	<p>Siting of future facilities under the Proposed Project could make a cumulatively considerable contribution to a significant cumulative impact in the following areas:</p> <ul style="list-style-type: none"> <li>• Agricultural Resources</li> <li>• Aesthetic Resources</li> <li>• Air Quality</li> <li>• Biological Resources</li> <li>• Cultural Resources</li> <li>• Hazardous Materials</li> <li>• Hydrology and Water Quality</li> <li>• Land Use</li> <li>• Mineral Resources</li> <li>• Noise</li> <li>• Population and Housing</li> <li>• Recreation</li> <li>• Transportation</li> <li>• Utilities</li> <li>• Greenhouse Gas Emissions</li> </ul>	Potentially Significant	Project-level mitigation for each resource area; for cumulative impacts related to Greenhouse Gas emissions, implement Air Quality mitigation measures (AQ-1 through AQ-20).	<p>Less Than Significant for all resource areas except for the following resource areas, which remain potentially significant:</p> <ul style="list-style-type: none"> <li>• Air Quality</li> <li>• Cultural Resources</li> <li>• Transportation</li> <li>• Greenhouse Gas Emissions</li> </ul>

\* Mitigation measures are summarized in this table; please see the applicable resource area section for complete descriptions of the mitigation measures.

## **SECTION 2**

### **CLARIFICATIONS AND CORRECTIONS**

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This Section of the Final Program EIR provides clarified text, addresses minor inconsistencies, or makes other minor modifications to the Draft Program EIR that do not affect the findings or conclusions of the Program EIR. The minor modifications to the Draft Program EIR occur in the following areas of the document and are provided as part of the administrative record for the Program EIR:

- Executive Summary
- Project Description
- Air Quality
- Cultural Resources
- Noise

#### **Program EIR Executive Summary – Table ES-2**

##### ES Modification 1

The third bulleted discussion under Section ES.1 from the bottom of page ES-1 states:

- “The City would establish 11 geographical franchise collection zones. These zones would delineate the boundaries in which the Franchised Hauler would be allowed to operate.”

This bulleted discussion has been revised to read:

- “The City ~~has established~~ ~~would establish~~ 11 geographical franchise collection zones. These zones ~~would~~ delineate the boundaries in which the Franchised Hauler would be allowed to operate.”

The fifth bulleted discussion under Section ES.1 from the bottom of page ES-2 states:

- “Provide a partnership between the City and the franchised hauler to increase diversion and identify challenges.”

This bulleted discussion has been revised to read:

- “~~The City and the Franchised Hauler would participate in a partnership between~~ ~~Provide a partnership between~~ the City and the franchised hauler to increase diversion and identify challenges.”

##### ES Modification 2

Under Impact CUL-1, the mitigation number has been changed to “CR-4” (from CR-1).

Under Impact CUL-2, the mitigation number has been changed to “CR-1” (from CR-2).

Under Impact CUL-3, the mitigation number has been changed to “CR-2” (from CR-3).

Under Impact CUL-4, the mitigation number has been changed to “CR-3” (from CR-4).

### ES Modification 3

Under Cumulative Impacts (page ES-48), “public services” has been removed from the list of potentially significant impacts.

## **Program EIR Project Description – Section 2.4**

### Project Description Modification 1

The first bulleted discussion under Section 2.4 on page 2-3 states:

- “Through contract negotiations, the City and the haulers would establish 11 geographical franchise collection zones. These zones would delineate the boundaries in which the Franchised Hauler would be allowed to operate.”

This bulleted discussion has been revised to read:

- ~~“The City has established 11 geographical franchise collection zones. Through contract negotiations, the City and the haulers would establish 11 geographical franchise collection zones. These zones would delineate the boundaries in which the Franchised Hauler would be allowed to operate.”~~

The fifth bulleted discussion under Section 2.4 from the bottom of page 2-4 states:

- “Provide a partnership between the City and the franchised hauler to increase diversion and identify challenges.”

This bulleted discussion has been revised to read:

- ~~“The City and the Franchised Hauler would participate in a partnership between~~ Provide a partnership between the City and the franchised hauler to increase diversion and identify challenges.”

## **Program EIR Air Quality – Section 3.1.1**

### AQ Modification 1

Under Impact AQ-5 in Table 3.1.1-1 (page 3-5), the Potential Impact for New Facilities has been changed from “No” to “Yes” and Mitigation has been changed from “None Required” to “Yes”.

## **Program EIR Cultural Resources – Section 3.1.2**

### CR Modification 1

The discussion under Impact CUL-4 states:

*“Future new or expanded processing facilities and new or expanded truck base yards would likely be located in industrial areas or on land zoned for industrial uses (due to the industrial nature of the facilities). Organics processing facilities could be sited on lands zoned for agricultural uses, depending on the processing technology utilized. industrial and agricultural areas are expected to have a low probability for containing human remains interred outside formal cemeteries due to the disturbed nature of these areas. Therefore, construction of new or expanded processing facilities and truck base yards is not expected to encounter interred human remains.”*



*Therefore, the Proposed Project is not expected to result in significant impacts related to encountering interred human remains."*

This section has been revised to read:

*"Future new or expanded processing facilities and new or expanded truck base yards would likely be located in industrial areas or on land zoned for industrial uses (due to the industrial nature of the facilities). Organics processing facilities could be sited on lands zoned for agricultural uses, depending on the processing technology utilized ~~industrial~~. Industrial and agricultural areas are expected to have a low probability for containing human remains interred outside formal cemeteries due to the disturbed nature of these areas. ~~Therefore, construction of new or expanded processing facilities and truck base yards is not expected to encounter interred human remains~~*

*Therefore, the Proposed Project is not expected to result in significant impacts related to encountering interred human remains. Although industrial and agricultural areas generally have a low probability for containing archaeological resources due to the disturbed nature of these areas, without site specific information, whether or not the future facilities would adversely affect archaeological resources cannot be determined at this time. Impacts to archaeological resources from the siting of facilities and truck base yards would be evaluated when a specific facility is proposed."*

#### CR Modification 2

Section 3.1.2.7 of the CR Section under mitigation measure CR-1 (page 3-37) states:

*"Future SWIRP projects that would result in earth-disturbing activities involving native sediments with the potential for producing archaeological materials, or projects located near known cultural resources, shall implement the following:"*

This paragraph has been revised to read:

*"Future ~~SWIRP~~ projects that would result in earth-disturbing activities involving native sediments with the potential for producing archaeological materials, or projects located near known cultural resources, shall implement the following:"*

Section 3.1.2.7 of the CR Section under mitigation measure CR-2 (page 3-38) states:

*"Future SWIRP projects that would excavate into alluvial sediments (e.g., Older Quaternary Alluvium deposits) or bedrock formations shall implement the following:"*

This paragraph has been revised to read:

*"Future ~~SWIRP~~ projects that would excavate into alluvial sediments (e.g., Older Quaternary Alluvium deposits) or bedrock formations shall implement the following:"*

Section 3.1.2.7 of the CR Section under mitigation measure CR-3 (page 3-39) states:

*"If human remains are encountered during SWIRP related projects, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. Section 7050.5 of the California Health and Safety Code provides for the disposition of accidentally discovered human remains and states that if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent*

remains shall occur until the County Coroner has determined the resources would require no further study."

This paragraph has been revised to read:

"If human remains are encountered during ~~SWIRP-related future~~ projects, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. Section 7050.5 of the California Health and Safety Code provides for the disposition of accidentally discovered human remains and states that if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the resources would require no further study."

Section 3.1.2.7 of the CR Section under mitigation measure CR-4 (page 3-39) states:

"Implementation of SWIRP could include development near historical resources or resources considered to be potential historical resources. This development has the potential to result in significant impacts to individual historical resources in the project area, including resources listed in or eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (California Register), and local registers. This could include the delisting or loss of eligibility of such resources. In addition, there is the potential for significant impacts to buildings or structures of historic age (45 years old or older), or buildings or structures that may eventually be of historic age, and that may qualify as historical resources pursuant to CEQA."

This paragraph has been revised to read:

"Implementation of ~~SWIRP~~ the Project could include development near historical resources or resources considered to be potential historical resources. This development has the potential to result in significant impacts to individual historical resources in the project area, including resources listed in or eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (California Register), and local registers. This could include the delisting or loss of eligibility of such resources. In addition, there is the potential for significant impacts to buildings or structures of historic age (45 years old or older), or buildings or structures that may eventually be of historic age, and that may qualify as historical resources pursuant to CEQA."

### CR Modification 3

Section 3.1.2.8 of the CR Section states:

*"The Proposed Project is not expected to result in impacts to paleontological resources, however, the Proposed Project would result in a potentially significant impact to cultural resources, even with mitigation. Implementation of mitigation measures CR-1 through CR-4 will require further investigation and identification of mitigation measures once a future project site is identified. However, since the specific locations of expanded or future facilities are not known, it cannot be conclusively stated at this time that all potential cultural impacts would be reduced to below a level of significance. Thus, impacts are considered potentially significant and unavoidable."*

This section has been revised to read:

*~~"The Proposed Project is not expected to result in impacts to paleontological resources, however, the Proposed Project would result in a potentially significant impact to cultural resources, even with mitigation. Implementation of mitigation measures CR-1 through CR-4 will require further~~*

~~investigation and identification of mitigation measures once a future project site is identified. has been provided to mitigate impacts to historic resources, archaeological resources, paleontological resources, and human remains. Impacts to paleontological resources, archaeological resources, and human remains would be reduced to a level below significance. Impact to historic resources would remain significant because whereas local regulations provide for the mitigation of impacts, they do not explicitly prohibit the demolition or alteration of historical resources. However, since the specific locations of expanded or future facilities are not known, it cannot be conclusively stated at this time that all potential cultural impacts would be reduced to below a level of significance. Thus, potential impacts to historic resources are considered potentially significant and unavoidable.~~

### **Program EIR Greenhouse Gas Emissions – Section 3.1.3**

#### GHG Modification 1

Under Impact GHG-2 in Table 3.1.3-1 (page 3-41), the Potential Impact for New Facilities has been changed from “Yes” to “No” and Mitigation has been changed from “Yes” to “None Required”.

### **Program EIR Noise – Section 3.2.9**

#### Noise Modification 1

The discussion under Impact NOI-1 (page 3-184) states:

*“Implementation of mitigation measures N-1 and N-9, described below, would mitigate potential noise impacts to less than significant levels.*

*Mitigation measure N-1 requires the preparation of a project-specific noise analysis once a facility has been proposed at a specific location. The project-specific noise analysis would determine the existing noise environment. It would also use project-specific traffic data to characterize the increase of the ambient noise environment due to the addition of traffic coming to and from the facility. Mitigation measure N-1 also requires further mitigation measures be implemented to reduce sound levels down to a level that is consistent with the applicable jurisdiction’s noise ordinance or noise element.*

*Mitigation Measure N-9 requires operational noise levels from future facilities to not exceed the applicable community noise standards at the property line for future facilities, transfer stations and truck base yards.”*

This section has been revised to read:

*“Implementation of mitigation measures N-1 and ~~N-9~~ N-7, described below, would mitigate potential noise impacts to less than significant levels.*

*Mitigation measure N-1 requires the preparation of a project-specific noise analysis once a facility has been proposed at a specific location. The project-specific noise analysis would determine the existing noise environment. It would also use project-specific traffic data to characterize the increase of the ambient noise environment due to the addition of traffic coming to and from the facility. Mitigation measure N-1 also requires further mitigation measures be implemented to reduce sound levels down to a level that is consistent with the applicable jurisdiction’s noise ordinance or noise element.*

*Mitigation Measure ~~N-9~~N-7 requires operational noise levels from future facilities to not exceed the applicable community noise standards at the property line for future facilities, transfer stations and truck base yards.”*

### Noise Modification 2

The discussion under Impact NOI-3 (page 3-186) states:

*"Implementation of mitigation measures N-1 and N-9, described below, would mitigate potential noise impacts to less than significant levels."*

This section has been revised to read:

*"Implementation of mitigation measures N-1 and ~~N-9~~N-7, described below, would mitigate potential noise impacts to less than significant levels."*

### Noise Modification 3

The discussion under Impact NOI-4 (page 3-186) states:

*"Implementation of mitigation measures N-1 through N-8 would reduce potentially significant noise impacts on sensitive receptors resulting from facility construction to less than significant levels."*

This section has been revised to read:

*"Implementation of mitigation measures N-1 through ~~N-8~~N-6 would reduce potentially significant noise impacts on sensitive receptors resulting from facility construction to less than significant levels."*

## **SECTION 3**

### **COMMENTS AND RESPONSES TO DRAFT PROGRAM EIR**

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The Draft Program EIR (City of Los Angeles Bureau of Sanitation) was distributed to the public and responsible and trustee agencies for a 50-day review and comment period, which began on November 21, 2013 and ended on January 10, 2014. The purpose of the 50-day public review and comment period was to provide interested individuals, groups, government representatives, and agencies the opportunity to review the Draft Program EIR and submit their written comments to the City of Los Angeles Bureau of Sanitation (Bureau of Sanitation).

Copies of the Draft Program EIR were distributed to agencies, organizations and the public whom requested to be on the mailing list for the Draft Program EIR, and also were provided to members of the public on request. The Draft Program EIR was also available electronically on the Bureau of Sanitation's web site, and at the following locations for public review.

- Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Los Angeles, CA 90015
- Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Northridge Library, 9051 Darby Avenue, Northridge, CA 91325
- Encino-Tarzana Library, 18231 Ventura Blvd, Tarzana, CA 91356
- West L.A. Regional Branch Library, 11360 Santa Monica Boulevard, Los Angeles, CA 90025
- Lincoln Heights Library, 2530 Workman Street, Los Angeles, CA 90031
- Robert Louis Stevenson, 803 Spence Street, Los Angeles, CA 90023
- San Pedro Regional Branch Library, 931 S. Gaffey Street, San Pedro, CA 90731
- Van Nuys Branch Library, 6250 Sylmar Avenue, Van Nuys, CA 91401

The mailing/distribution list for the Draft Program EIR and the Final Program EIR is provided as Section 6. The Notice of the availability of the Draft Program EIR and the date, time and location of public meetings on the Draft Program EIR was published in the Los Angeles Times and in various foreign language newspapers, and a copy of the Notice of Completion and the Draft Program EIR were filed with the Los Angeles County Clerk's Office and with the California State Clearinghouse. Copies of these various notices are included in Appendices A through C of this Final Program EIR.

The Bureau of Sanitation held six public information meetings on the Draft Program EIR at the following locations to provide the public with an overview of the Draft Program EIR and an opportunity to provide written comments on the Draft Program EIR:

- Monday, December 9, 2013, 6:00pm - 7:30pm, 19040 Vanowen St. Reseda, CA
- Tuesday, December 10, 2013, 6:00pm - 7:30pm, 13520 Van Nuys Blvd., Suite 220, Pacoima, CA
- Wednesday, December 11, 2013, 6:00pm - 7:30pm, 2920 Overland Ave., Los Angeles, CA
- Thursday, December 12, 2013, 6:00pm - 7:30pm, 560 N Western Ave., San Pedro, CA
- Monday, December 16, 2013, 2:00pm - 4:00pm, City Hall, 200 N Spring St., 4th Fl. Media Room, Los Angeles, CA
- Monday, December 16, 2013, 6:00pm - 7:30pm, 7020 S Figueroa St., Los Angeles, CA

This section of the Final Program EIR provides the public and agency comments received on the Draft Program EIR and specific responses to those comments on the Draft Program EIR. The City of Los Angeles Bureau of Sanitation received letters from one agency and eleven public organizations on the Draft Program EIR (Table 3-1).

This section of the Final Program EIR contains a copy of each comment letter received on the Draft Program EIR. Each letter has been assigned a document control number (1, 2, 3, etc.). Specific comments within each letter have been assigned a comment number (1, 2, 3, etc.). Table 3-1 provides a list of the comment letters received, their corresponding document control numbers, and their page location within this section of the Final Program EIR. Specific responses to the comments raised in the various letters follow each comment letter.

In some instances, the reader may discover the same response to two or more different comments. That is because, in a few instances, the comments were found to address the same issue(s) or concern(s). To provide consistency and aid in the review of this Final Program EIR, standard responses were developed and provided in response to recurring comments.

**TABLE 3-1**  
**LIST OF DRAFT PROGRAM EIR COMMENT LETTERS**

<b>Letter Number</b>	<b>Respondent</b>	<b>Date</b>	<b>Page Number</b>
1	Los Angeles Unified School District	January 10, 2014	3-3
2	State of California, Native American Heritage Commission	December 11, 2013	3-5
3	Athens Services	January 9, 2014	3-12
4	Dignity Health	January 8, 2014	3-48
5	Hospital Association of Southern California	January 9, 2014	3-52
6	Hollywood Chamber of Commerce	January 10, 2014	3-57
7	Motion Picture Association of America, Inc.	January 8, 2014	3-61
8	Los Angeles County Disposal Association	January 9, 2014	3-64
9	Valley Industry and Commerce Association	No date included on letter	3-73
10	Don't Waste LA	January 10, 2014	3-77
11	Apartment Association Greater Los Angeles	January 9, 2014	3-81
12	California Grocers Association	January 10, 2014	3-84

# Los Angeles Unified School District

## Office of Environmental Health and Safety

JOHN E. DEASY, Ph.D.  
Superintendent of Schools

ENRIQUE G. BOULLT  
Chief Operating Officer

JOHN STERRITT  
Director, Environmental Health and Safety

January 10, 2014

Daniel Meyers  
Senior Civil Engineer  
Solid Resources Citywide Recycling Division, Bureau of Sanitation  
1149 South Broadway  
5th Floor, Mail Stop 944  
Los Angeles, CA 90015.

*Sent via Electronic Mail*

**SUBJECT: LAUSD COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (Draft PEIR) CITY OF LOS ANGELES COMMERCIAL AND MULTIFAMILY FRANCHISE HAULING (ZERO WASTE LA) STATEMENT/ENVIRONMENTAL IMPACT REPORT**

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS), regarding the Draft Program Environmental Impact Report (PEIR) prepared for the so-called Zero Waste LA Program.

Overall, LAUSD is supportive of the Zero Waste LA Program, which aligns in goals and potential environmental benefits with LAUSD's School Recycling Program. We would encourage an ongoing dialogue and cooperation between the City of Los Angeles and LAUSD to accomplish these goals and realize the potential benefits.

1-1

With regard to specific projects that may be implemented as a part of this Program, LAUSD will serve as a Responsible Agency during the CEQA process, as waste facilities and operational logistics (e.g., truck routes) must be planned in consideration of the proximity to schools within LAUSD's jurisdiction. We look forward to being a positive part of these important processes.

1-2

Thank you for the opportunity to comment on this important project. If you need additional information please contact Pat Schanen at (213)241-3921 or the undersigned at (310)918-7791.

Sincerely,



John R. Anderson  
Senior CEQA Advisor

## LETTER 1

### Los Angeles Unified School District

Specific responses to comments from the Los Angeles Unified School District (LAUSD) comment letter, dated January 10, 2014, are provided below.

#### Response to Comment 1-1

The Bureau of Sanitation (Sanitation) appreciates the support of the LAUSD for the City's Zero Waste LA Program, and Sanitation looks forward to continuing its discussion with LAUSD about this important program.

#### Response to Comment 1-2

Sanitation will include LAUSD in discussions should future new waste and recyclable material processing facilities, or truck base yards be considered within proximity to schools within LAUSD's jurisdiction. The City of Los Angeles may not be the CEQA lead agency for such potential new facilities; rather, the CEQA lead agency may be another municipality. However, Sanitation will be involved in or aware of such projects. As a point of clarification, since such facilities would not be located on LAUSD school property, while LAUSD would be included in the CEQA process, it would not be a Responsible Agency under CEQA, as no specific approval or permits for such facilities would be issued by LAUSD. However, the interests and concerns of LAUSD are recognized.



STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
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December 11, 2013

Mr. Dan Meyers

**City of Los Angeles, Bureau of Sanitation**

1149 S. Broadway, 5<sup>th</sup> Floor, MS 944  
Los Angeles, CA 90015

RE: SCH#2013021052; CEQA Notice of Completion; Draft Environmental Impact Report (DEIR) for the **"City-Wide Exclusive Franchise System for Municipal Solid Waster Collection and Handling Project;"** located in the City of Los Angeles; Los Angeles County, California

Dear Mr. Meyers:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

2-1

2-2

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

2-2  
(cont'd)

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies" and Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

2-3

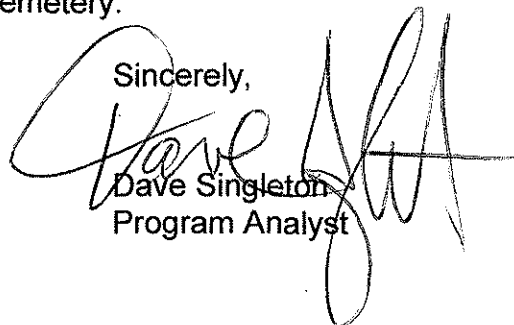
Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

2-4

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

2-5

Sincerely,



Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Los Angeles County California  
December 11, 2013**

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Tataviam  
Fernandeño

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randrade@css.lacounty.gov  
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**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013021052; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the City-Wide Franchise System for Solid Waster Collection and Handling; located in the City of Los Angeles; Los Angeles County, California.

**Native American Contacts  
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December 11, 2013**

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**ndnRandy@yahoo.com**                      Tataviam  
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(760) 636-0854- FAX  
bacuna1@gabrielinotribe.org

Gabrielino-Tongva Tribe  
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**Native American Contacts  
Los Angeles County California  
December 11, 2013**

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State of California  
Native American Heritage  
Commission  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691



9001532297 0005



## LETTER 2

### Native American Heritage Commission

The Native American Heritage Commission comment letter dated December 11, 2013 was enclosed and received by the State Clearinghouse. Specific responses to comments to the NAHC comment letter are provided below.

#### Response to Comment 2-1

As discussed in Sections 3.1.2.5 to 3.1.2.8 of the Draft Program EIR (pp. 3-35 to 3-40), the Proposed Project would not result in physical changes related to the basic methods used for the collection of Solid Resources in the City and would not result in physical changes or new development that could adversely affect archaeological or historic resources. However, future new or expanded processing facilities and new or expanded truck base yards, while expected to be located in industrial areas or on land zoned for industrial uses, could be located in undeveloped areas. Therefore, without site-specific information, whether or not the future facilities would adversely affect cultural resources or historic resources cannot be determined at this time. The potential for future facilities to affect cultural resources or historic resources will be further addressed in the project-specific environmental document prepared by the Lead Agency for the jurisdiction in which such new or expanded facilities are located.

Section 3.1.2.7 of the Draft Program EIR (pp. 3-37 to 3-39) includes Mitigation Measures CR-1 and CR-3, which includes conducting an initial record search at the appropriate Information Center and a Sacred Lands check with the Native American Heritage Commission as noted by the Native American Heritage Commission in its comment letter dated December 11, 2013.

#### Response to Comment 2-2

Section 3.1.2.7 of the Draft Program EIR includes Mitigation Measures CR-1 and CR-3 (pp 3-37 to 3-39) that are consistent with the Native American Heritage Commissions recommendations included in its December 11, 2013 comment letter of the Draft Program EIR.

#### Response to Comment 2-3

Section 3.1.2.7 of the Draft Program EIR includes Mitigation Measures CR-1 and CR-3 (pp 3-37 to 3-39) that are consistent with the Native American Heritage Commissions recommendations included in its December 11, 2013 comment letter of the Draft Program EIR.

#### Response to Comment 2-4

Section 3.1.2.7 of the Draft Program EIR includes Mitigation Measures CR-1 and CR-4 (pp 3-37 to 3-39) that are consistent with the Native American Heritage Commissions recommendations included in its December 11, 2013 comment letter of the Draft Program EIR.

#### Response to Comment 2-5

Section 3.1.2.7 of the Draft Program EIR includes Mitigation Measure CR-3 (p 3-39) that is consistent with the Native American Heritage Commissions recommendations regarding if human remains are encounter included in its December 11, 2013 comment letter of the Draft Program EIR.





January 9, 2014

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City of Industry, CA 91716-0009  
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Daniel K. Meyers, Assistant Division Manager  
Solid Resources Citywide Recycling Division  
City of Los Angeles Department of Public Works  
Bureau of Sanitation  
1149 S. Broadway, 5th Floor  
Los Angeles, CA 90015

Comment letter #3

**RE: Comments Regarding Solid Waste Franchise Draft Program EIR**

Dear Mr. Meyers:

Athens Services ("Athens") is pleased to submit the following comments on the Draft Program Environmental Impact Report (the "EIR") for the Commercial and Multifamily Exclusive Waste Hauling Franchise (the "Exclusive Franchise") in City of Los Angeles (the "City").

We commend the City for its leadership in advancing the ambitious policy goals set forth in the Solid Waste Integrated Resources Plan ("SWIRP"). While Exclusive Franchises for commercial and multifamily waste hauling are just one piece of the larger Zero Waste strategy, they are a critically important tactical element of the plan to achieve 90% landfill diversion. Athens believes that, based on its resources and experience, it can be an important and valuable partner in this effort, and we stand ready to support the City in its pursuit of its Zero Waste diversion goals.

We offer these comments in a spirit of cooperation. Our goal in providing this feedback is twofold: to help the City accomplish the policy goals it has set forth, and to help the City avoid any potential issues down the road that might hinder its ability to achieve its Zero Waste diversion targets.

As one of the largest and most successful recycling service companies in Southern California, Athens has made very significant investments in state-of-the-art recycling,



composting, and food waste processing infrastructure. Athens provides solid waste hauling and recycling services, many by exclusive franchise, to over 30 jurisdictions in Los Angeles County. We provide the cities we serve with a balance of Source Separation, organics processing and Mixed Waste processing services which are driven by ever-improving technological solutions that deliver superior recovery and diversion results.

We are constantly evaluating innovative alternatives for diverting fractions of the waste stream that are screened and separated at our Materials Recovery Facility ("MRF"). Currently we are evaluating taking certain waste fractions from our MRF processing that have concentrated organic content and high BTU content, and producing suitable feedstock for anaerobic digestion and RDF that will no longer go to a landfill. If successful, our diversion rate will increase dramatically.

All of these efforts stem from our unwavering belief that expanded, enhanced and new MRFs will need to find more ways to process mixed waste streams in order to improve diversion. This view is shared by both CalRecycle and by the State Legislature (AB 1126<sup>1</sup>), both of which anticipate greater diversion from Mixed Waste processing, and have even defined a new term: "engineered municipal solid waste" ("EMSW") which emphasizes more processing of the municipal solid waste stream.

Since we do not own landfills, our primary focus is on recycling and diversion, which uniquely positions our company to be an important part of the solution to the solid waste challenges facing the City, and to help the City meet its Zero Waste goals.

#### **OVERVIEW:**

Athens wants to help the City to meet the goals of an Exclusive Franchise system: to maximize diversion and to improve air quality by minimizing vehicle miles traveled. We believe the recycling programs implemented by the City have served Los Angeles well, but that even greater diversion can be accomplished with a more flexible, and all-encompassing approach to recycling.

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<sup>1</sup> [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB1126](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB1126)

Athens agrees with the goals of the project as directed by the Los Angeles City Council in November 2012 and prescribed during the public Scoping period. However, because of the inclusion of a Source Separation recycling mandate in the City's Final Implementation Plan ("FIP"), an argument can be made that the Proposed Project studied in the EIR is inconsistent with the project as originally directed by the City Council, and prescribed during the public Scoping sessions.

That said, we believe that there is a larger strategic concern with the EIR that has the potential to cause problems for the City in the future. By relying solely on Source Separation, which is not always practical or effective in servicing commercial and multifamily waste generators, the City is potentially limiting its ability to accomplish its diversion and air quality goals.

The FIP however includes the following goals for the Proposed Project:

1. The establishment of franchise agreements that have landfill disposal targets and penalties for not meeting those targets;<sup>2</sup>
2. The establishment of franchise agreements that allow for the implementation of new programs to reach the City's Zero Waste goals; <sup>3</sup> and
3. Encouragement for franchisees to exceed minimum targets in their Franchise proposals through the use of innovative programs.<sup>4</sup>

The Franchise EIR includes the following goals:

4. The City's intention that franchisees should "meet the City's Zero Waste goals by establishing maximum disposal for each zone and implementing waste diversion programs that are consistent with SWIRP Goals."<sup>5</sup>

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<sup>2</sup> FIP, Section 3.6.4

<sup>3</sup> FIP, Section 3.6.4

<sup>4</sup> FIP, Section 3.6.4

<sup>5</sup> Franchise EIR, Project Goal #1, P. ES-3

5. The City's intention that franchisees shall be required to "minimize vehicle miles traveled" in the new Franchise zones.<sup>6</sup>

The common theme among all of these stated Goals—in both the FIP and the EIR-- is "flexibility and inclusion." Setting diversion targets, allowing and encouraging program innovation, consistency with SWIRP, and finding ways to minimize Vehicle Miles Traveled, all demonstrate the City's intention to give Franchise haulers the ability to use whatever recycling and diversion strategies they identify as appropriate for meeting the City's diversion targets in their respective Franchise zones.

3-1  
(cont'd)

We believe that a Source Separation mandate alone cannot provide the diversion necessary for the City to meet its Zero Waste goals and puts the City at a disadvantage in its efforts to maximize diversion because it forces haulers to implement a recycling strategy that often is neither practical nor effective in the settings for which the Exclusive Franchise was designed (e.g., multifamily dwellings). For this reason, we strongly believe that haulers should be able to implement Mixed Waste processing solutions in addition to Source Separated recycling in their plans to meet Franchise requirements and City goals.

The EIR's analysis is predicated on the belief that Mixed Waste processing results in inferior materials recovery rates, as compared to Source Separation. However, the reality is that there is no data<sup>7</sup> presented that shows Source Separation will provide higher diversion than Mixed Waste processing of a single bin in the commercial and multifamily sector. In fact, certain data presented by the City suggests just the opposite as being true. Further, our business experience shows clearly that the opposite is true: Mixed Waste processing is very effective and yields very high, verifiable recycling rates.

3-2

The City has engaged in a pilot multifamily recycling<sup>8</sup> project. Based on data from the SWIRP EIR, it is clear that the potential exists to significantly increase diversion within the multifamily sector. However, reliance exclusively on Source Separation in multifamily dwellings-- which contribute nearly an estimated 500,000 tons per year of

<sup>6</sup> Franchise EIR, Project Goal #5, P. ES-3

<sup>7</sup> It should be noted that one of the City's justifications for requiring an Exclusive Franchise system is to obtain better data.

<sup>8</sup> SWIRP EIR, Appendix C Sec 3.1.1.2



waste to landfills—presents a unique challenge. In fact, the City has heard in verbal and written testimony from apartment associations that often it is virtually impossible to provide Source Separated service to buildings that lack space for multiple bins or that rely on a single garbage chute for disposal.

In the City's multifamily pilot program, only approximately 13,000 tons per year are recycled from this large sector-- less than 3%. Adopting a single Black Bin waste stream processed at a MRF that is certified by the City for 19% to 32% materials recovery will accomplish greater diversion than current programs.

We conclude from data presented within the EIR that fewer Vehicle Mile trips will result from a hauler's use of Mixed Waste processing than under the City's proposed project<sup>9</sup> (i.e., under a "Source Separation mandate").

If, in fact, Mixed Waste processing recovers more materials and results in fewer vehicle trips than Source Separation, then we believe it should be included in the EIR as an Alternative for review, and also be designated as an environmentally superior solution to Source Separation.

Athens believes, based on its years of experience and success, that Mixed Waste processing facilities and related infrastructure—which are becoming more and more technologically advanced—must be viewed as an essential part of the City's efforts to meet its Zero Waste goals in general, and the Program Goals set forth above, specifically. The SWIRP EIR reinforces this notion by identifying Mixed Waste processing of Black Bin materials as a necessary component of the implementation of SWIRP.<sup>10</sup>

Therefore, it is our conclusion that Mixed Waste processing should—at a minimum—be included in an innovative program for achieving Zero Waste, and accepted as a means to meeting the City's stated goals 1 through 5, above.

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<sup>9</sup> Franchise EIR, Section 2.5.4.4

<sup>10</sup> The SWIRP EIR estimates that as many as five new mixed waste processing facilities will be required—SWIRP EIR, Alternative 4 pg ES 21

It is important to note that Athens is not suggesting that Mixed Waste processing should replace Source Separation altogether. (In fact, Athens provides Source Separated recycling services to many of our customers, principally those who have roll-off or compactor service and the available space to store multiple bins.) Rather, we believe that the City cannot achieve its Zero Waste goals through Source Separation *alone*, and that it may actually be hindering its ability to pursue its Project Goals by relying exclusively on Source Separation.

Therefore, it would be prudent for the City to adopt diversion targets and performance goals whereby the Franchisee would be allowed to tailor its collection methods to its specific customer base, and to capitalize on new MRF equipment and technologies as a means to achieving optimal recovery and diversion.

This arrangement has the added benefit of insulating the City from culpability in the event it fails to meet its diversion targets. Responsibility for falling short of Franchise requirements would rest solely with the Franchised hauler if no mandated recycling technology or other similarly restrictive Franchise requirements were in place in the franchise agreement.

3-2  
(cont'd)

If the intent of the Exclusive Franchise system is to increase landfill diversion in order to advance the City's Zero Waste goals articulated through SWIRP, then the City should not assume that a Source Separation mandate is the only means to obtain more diversion. In fact, despite the relative effectiveness of three-cart Source Separation recycling in single family residences, almost 900,000 tons per year of residual waste goes to landfills. We reiterate our belief that the City should leave open as many options as possible to ensure it can meet future diversion targets.

*While we submit to the City the comments in this letter in their entirety, the following Executive Summary provides a summary of those comments. A more detailed analysis follows the Executive Summary:*

## **EXECUTIVE SUMMARY:**

### **I. The EIR Fails to Study the Original Program Goals Approved by the City Council and Included in the Public Scoping Documents**

The original Program Goals approved by the City Council in November 2012 and included in the public Scoping documents were changed after the conclusion of the Scoping sessions, but prior to the drafting of the EIR. Therefore, the EIR fails to study the original program that was approved by the City Council and for which public commentary was solicited and accepted via the Scoping sessions.

The program was changed significantly: a Source Separation mandate was added, thereby ignoring the direction to minimize overall Vehicle Miles Traveled. (The City's own data demonstrates conclusively that a Source Separation mandate increases Vehicle Miles Traveled; any routing efficiencies achieved through the implementation of an Exclusive Franchise system merely *offset* these additional Vehicle Miles Traveled—they do not *minimize* Vehicle Miles Traveled from the current baseline, as intended by the Program Goal.)

It could be argued that fundamentally changing the nature of the program after the conclusion of the Scoping sessions prevented the public from commenting on the new program and limited its ability to fully participate in the environmental review process.

### **II. Consistency with SWIRP**

The Exclusive Franchise system, as initially proposed, was intended to be consistent with SWIRP which, among other things, requires the processing of single-stream Black Bin waste (i.e., all waste disposed of in a single container and taken to a MRF).

While the proposed project described in the EIR anticipates Black Bin *collection*, it does not require the inclusion of Mixed Waste *processing* in any Exclusive Franchise scenario. Not only is this a fundamental and significant departure from SWIRP, it needlessly landfills Black Bin waste that could otherwise be processed at a MRF. Furthermore,



because the City recognizes that Blue Bin contamination by non-recyclables occurs regularly, it is reasonable to conclude that a considerable volume of recyclables also is discarded into black bins.

3-4

Athens believes that an additional alternative should be studied in the Exclusive Franchise EIR that requires Black Bin MRF processing of materials before being sent to a landfill.

### **III. Source Separated Recycling vs. Mixed Waste Processing**

A Source Separation mandate creates environmental impacts in the areas of air quality, traffic, and noise, as it will dramatically increase Vehicle Miles Traveled and Vehicle Hours Traveled within the Exclusive Franchise Zones.

Furthermore, a Source Separation mandate, coupled with the absence of a requirement for Mixed Waste processing in the FIP, limits the City's ability to maximize diversion and achieve its Zero Waste goals. Source Separation as demonstrated by the City's own data is limited in its effectiveness and is hindered by chronic contamination of Blue Bin materials that results in lower recovery of recyclables and lower diversion.

3-5

We reiterate that the proposed project described in the Draft Exclusive Franchise EIR should track more closely with SWIRP and include the study of Alternatives that involve a role for Mixed Waste processing.

### **IV. Athens' Infrastructure and Capacity is Underreported in the EIR.**

The Exclusive Franchise EIR references the SWIRP Draft Program EIR in its discussion of our company's existing and planned infrastructure and capacity. The EIR does not recognize 8,000 tons per day of Athens' current or planned Mixed Waste and organics processing capabilities.

3-6

We believe that the EIR should acknowledge this discrepancy and include updated data that accurately reflects Athens' infrastructure and capacity, and therefore, its ability to partner with the City in advancing the City's Zero Waste goals.

#### **V. Dismissing Mixed Waste Processing is Inappropriate.**

In dismissing Mixed Waste processing and a Hybrid Recycling System<sup>11</sup> as, "Alternatives Considered and Withdrawn," the EIR relies on faulty assumptions. A detailed discussion of those faulty assumptions is included in the Supporting Analysis, below, but we are concerned that the City is putting itself in a potentially difficult situation with its preference for only one kind of recycling—Source Separation—to the exclusion of any and all others. Given the historical results of Source Separated recycling in the commercial and multifamily sectors, it will be difficult to achieve the City's ambitious diversion goals via Source Separation alone.

3-7

We believe that Mixed Waste processing or a hybrid system based on diversion targets deserves further study.

#### **VI. The EIR Should Present More Clearly the Data Demonstrating Additional Vehicle Miles Traveled Under a Source Separation Mandate.**

The Exclusive Franchise EIR fails to lay out clearly the environmental impact of a Source Separation mandate in terms of additional Vehicle Miles Traveled and Vehicle Hours Traveled. While the data is available within the EIR, it is not presented clearly and explicitly. This important data should be presented in the final Exclusive Franchise EIR in a manner that is clearer and easier to understand.

3-8

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<sup>11</sup> Franchise Draft EIR, Section 2.5.4.4 and 2.5.4.5



## **SUPPORTING ANALYSIS:**

### **I. Compliance with City Council Intent & Public Scoping Sessions:**

The original City Council action in November 2012 called for the Bureau of Sanitation to develop an Exclusive Franchise Implementation Plan that set diversion targets<sup>12</sup> and minimized Vehicle Miles Traveled within the new Exclusive Franchise Zones.

The FIP that the Bureau of Sanitation presented to the City Council six months later, in April 2013, conflicted with the City Council's instructions by including a Source Separation mandate that contradicts and undermines the City Council's requirement to minimize Vehicle Miles Traveled.

By approving the FIP, the City Council fundamentally changed the nature of the Exclusive Franchise it adopted in November 2012, and for which public Scoping sessions<sup>13</sup> were held. This raises questions about whether the EIR actually studied the Exclusive Franchise plan on which the public commented, and whether new public Scoping sessions should have been held to allow for public feedback on the revised Exclusive Franchise system.

In its direction to set diversion targets and to minimize Vehicle Miles Traveled, the City Council clearly did not intend to mandate Source Separation, because—as the Exclusive Franchise EIR demonstrates-- a Source Separation mandate will increase Vehicle Miles Traveled significantly<sup>14</sup>. Therefore, it is reasonable to infer that the City Council's legislative intent was to provide haulers with the flexibility to use whatever recycling technologies they deemed best to comply with specific diversion targets.

Furthermore, by including a Source Separation mandate and ignoring Mixed Waste processing altogether, the FIP conflicted with the City Council's directive to recommend a strategy to address "Strategic planning for waste infrastructure needs, including

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<sup>12</sup> The City Council neither mandated nor specified the inclusion of any specific recycling technology or process.

<sup>13</sup> [http://www.lacitysan.org/ZeroWasteLA/PDFs/reports/NOP-Posted\\_2-26-13\\_added-date.pdf](http://www.lacitysan.org/ZeroWasteLA/PDFs/reports/NOP-Posted_2-26-13_added-date.pdf)

<sup>14</sup> Exclusive Franchise EIR: Table 4-2, FORECAST 2030 VMT AND VHT

sorting, transfer, and processing facilities.<sup>15</sup> By referencing both “sorting” and “processing” facilities, the City Council envisioned a role for both Source Separation (processing) and Mixed Waste processing (sorting).

While we acknowledge that the City Council later approved the Bureau of Sanitation’s FIP, we believe there is great merit to—at the very least—revising the Exclusive Franchise EIR to study an additional Alternative that reflects the City Council’s original intent to set diversion targets and minimize Vehicle Miles Traveled.

3-9  
(cont'd)

## **II. Consistency with SWIRP**

SWIRP is the backbone of the City’s Zero Waste efforts, and effectively is a “roadmap” to reaching the City’s goal of 90% diversion. The Exclusive Franchise system should complement SWIRP and seek to advance its Zero Waste goals.

In the recently released SWIRP EIR, every alternative that was studied included Mixed Waste processing of Black Bin materials, a fact that indicates the importance of Mixed Waste processing in the City’s overall strategy for addressing its solid waste challenges. By ignoring any and all Black Bin processing options, the Exclusive Franchise EIR conflicts with SWIRP and threatens to create a suboptimal Exclusive Franchise system that will fall short of its diversion potential.

3-10

Athens believes that an additional Alternative should be studied in the Franchise EIR that requires Black Bin processing.

## **III. Source Separated Recycling vs. Mixed Waste Processing**

In written comments submitted to the City about the SWIRP EIR (“SWIRP Comments”), Athens presented a detailed comparative analysis of Source Separated recycling versus Mixed Waste processing. Those written comments are incorporated by reference in this

3-11

<sup>15</sup> [http://ckrep.lacity.org/online/docs/2010/10-1797\\_CA\\_11-14-12.pdf](http://ckrep.lacity.org/online/docs/2010/10-1797_CA_11-14-12.pdf)

letter, and attached hereto as "Addendum A." We respectfully ask that our SWIRP Comments be included in their entirety as part of our formal comments on the Exclusive Franchise EIR.

The analysis we submitted to the City in our SWIRP Comments demonstrated that Source Separation alone cannot achieve the City's Zero Waste goals, and that MRF's are an important complement to—and in certain situations, an important alternative to— Source Separated recycling.

Highlights of our SWIRP Comments include:

- In 2006, the City's single family residential curbside program recovered 184,000 tons out of a 1,172,000 ton waste stream, for a recovery rate of 15.7%<sup>16</sup>
- In 2006, the City's multifamily recycling programs recovered 13,000 tons out of a 555,000 ton waste-stream, for a recovery rate of 2.3%<sup>17</sup>
- The City's Mixed Waste Materials Recovery Facilities are certified to recover between 19% and 32% of the solid waste they process.<sup>18</sup>
- The "clean MRFs" that process the Bureau's residential curbside Blue Bin materials report that between 24% and 41% of that waste stream is residual waste. This significant residual waste will lead to contamination of recoverable materials; therefore there is no advantage to Source Separation compared to Mixed Waste processing in this regard.
- *Comparing Source Separation to Mixed Materials Processing:* A comparative analysis of Source Separation and Mixed Waste processing demonstrates that a Source Separation mandate shows no benefit in achieving diversion goals, recovers less material, and puts more vehicles on the roads:

<sup>16</sup> SWIRP Draft Program EIR, Pages C-7, C-17-25

<sup>17</sup> *loc cit*

<sup>18</sup> Franchise Draft Program EIR, Page 2-13

3-11  
(cont'd)



3-11 (cont'd)

	Source Separation Mandate	Mixed Materials Processing
Does it meet the City's Zero Waste Goals?	YES	YES
Maximum Diversion Estimated by SWIRP EIR	98%	98%
Net Increase in Vehicle Miles Traveled	61%	-
Net Increase in Vehicle Hours Traveled	70%	-
Recycling Recovery Rate	Residential Curbside: 15.7% Multi-Family Blue Bin: 2.3%	Materials Recovery Facilities Certified to recover: 19% to 32%

#### IV. Athens' Infrastructure and Capacity is Underreported in the EIR.

The Facilities Analysis in the SWIRP EIR referenced in the Exclusive Franchise EIR is out of date and missing information. Athens has more than 8,000 current or future tons per day in Mixed Waste and organics processing capabilities that are not accounted for in the Facilities Analysis. This, alone, represents a significant majority of the City's waste processing needs.

3-12

For a detailed analysis of Athens's current and future infrastructure and capacity, please see our SWIRP Comments, attached hereto as "Addendum A."

#### V. Withdrawal of Alternatives from Consideration without Basis

By dismissing mixed materials processing and a Hybrid Recycling System<sup>19</sup> as, "Alternatives Considered and Withdrawn," we believe that the Exclusive Franchise EIR is deficient. The grounds for withdrawing these options are insufficient and in some cases, inaccurate:

3-13

*(a) "The level of diversion would be lower than the Proposed Project."*

We do not believe this claim is substantiated by available data.

Data provided in the Draft SWIRP Program EIR shows that the City's Source Separated recycling program for multifamily housing recovers just 2.3% of the waste stream. The City's residential curbside program, recovers just 15.7%. These programs divert LESS than the certified diversion rates of mixed materials processing facilities.

<sup>19</sup> Franchise Draft EIR, Section 2.5.4.4 and 2.5.4.5

Even the most optimistic estimates for diversion in multifamily housing project diverting 239,000 tons per year in 2030<sup>20</sup> out of a total waste stream of 697,000 tons<sup>21</sup>, or *34 percent*. (The EIR provides no explanation for how diversion will increase from its present level to 34%. This projection appears to be extremely aggressive, especially because there is little or no opportunity for Source Separation in many multifamily dwellings.)

We believe that the City is unlikely to achieve these targets through Source Separation alone. An all-encompassing set of options that includes Mixed Waste processing is required. Source Separated recycling has been part of the City's waste management efforts for years, and the results have been consistent—how will simply doing more of the same result in a nearly fifteen-fold increase in recovery rates?

Even if it were possible to increase current recycling rates this dramatically, the recovery rate is on par with the most effective certified mixed materials processors. The difference between a 34% recovery rate in a Source Separated system and a 32% recovery rate for mixed materials processing amounts to a difference in Citywide diversion of less than 0.15%.

We have seen the effectiveness of a flexible/hybrid approach firsthand. In Redondo Beach, for example, where we operate an exclusive franchise for residential and commercial waste hauling and processing, our company offers a three-bin residential cart program (Black, Blue, Green), commercial clean recycling bins, and commercial trash bins (Black Bins), and we send all of the Black and Blue containers, and all clean commercial recycling, to a MRF. By incorporating a mix of Blue Bin recycling and Green Bin organics, where appropriate, with Black Bin processing, we are able to recover 75% of the waste stream in Redondo Beach. The clear take-away from this example, we believe, is that Mixed Waste processing needs to factor into City's recycling plans—in addition to Source Separation—if it is going to meet its aggressive diversion targets.

3-13  
(cont'd)

*(b) "It [Mixed Waste processing] produces a higher level of contamination."*

In fact, the City's own documents demonstrate that there is significant, chronic contamination of Blue Bin Source Separated materials from single family residences. This, coupled with the fact that the Blue Bin volumes are typically only approximately 15% of the commercial/residential waste stream, leads to an anemic recovery rate within the overall waste stream (residential, multifamily dwellings, and commercial establishments).

Contamination levels in the City's own residential curbside collection show that between 24% and 41% of the "clean" waste stream that consumers segregate and deposit into Blue Bins (the Blue Bin waste stream) is residual material. Given that mixed materials processors are certified to recover roughly the same amount of materials as the City's highest estimates for a multifamily Source Separated system, the contamination rates

<sup>20</sup> Franchise Draft EIR, Page 2-6

<sup>21</sup> SWIRP Appendix B, Page B-20



between the two processes should be considered roughly equal.

*(c) "It does not produce a Citywide uniform recycling message with the City's current three bin Source Separated program."*

This seems to assign greater importance to "messaging" than to "results." The City's public relations and education messages should *follow* policy, not *lead* policy, as this argument suggests.

*(d) "A single bin system for residents under the Proposed Project, and three bin system for all other residents, will create confusion and could jeopardize the City goal of Zero Waste, 90 percent by 2025."*

Real data must take precedence over hypothetical outcomes.

Regardless of any possible confusion, the City's own analysis of mixed materials processing (SWIRP Program EIR Alternative 2), exceeds the City's Zero Waste goal, without any other upstream or downstream programs.<sup>22</sup>

Given the environmental harm to air quality and traffic caused by a Source Separated collection system, the City should consider how it can justify continuing a multiple-bin system for single-family residents.

For these reasons, we believe that Mixed Waste processing and/or a hybrid system based on diversion targets deserve further study.

## **VI. The analysis of the additional Vehicle Miles Traveled caused by a Source Separation mandate should be presented more clearly.**

The Exclusive Franchise EIR fails to lay out clearly the environmental impact of a Source Separation mandate in terms of additional Vehicle Miles Traveled and Vehicle Hours Traveled. While the data is available within the EIR, it is not presented clearly and explicitly.

It is possible to derive an estimate of these impacts by comparing the Non-Exclusive Franchise system (Alternative 1) to the projections under a No Project Scenario. Because the only trip-generating policy in a Non-Exclusive system versus No Project is a Source Separation mandate, the difference in Vehicle Miles Traveled, Vehicle Hours Traveled and Trucks Required represents the environmental impacts of a Source Separation mandate.

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<sup>22</sup> SWIRP Draft Program EIR, Page ES 19

3-13  
(cont'd)

3-14

Using this data, we created the following chart, and it clearly demonstrates the environmental impacts of a Source Separation mandate:

	No Project	Alternative 1	Effects of Source Separation Mandate
Vehicle Miles Traveled/Year <sup>23</sup>	10,488,034	16,107,380	5,619,346 VMT (+53.6%)
Vehicle Hours Traveled/Year <sup>24</sup>	992,597	1,587,034	594,437 VHT (+60%)
Trucks Required <sup>25</sup>	329	526	197 Trucks (+59.8%)

Although the diversion benefits of a Source Separation mandate are *de minimis*, the environmental impacts caused by a Source Separation mandate's route duplication are roughly equivalent to the reductions in route duplication achieved by implementing an Exclusive Franchise.

Because the implementation of an Exclusive Franchise system effectively neutralizes the additional Vehicle Miles Traveled caused by a Source Separation mandate, it is easy to understand the City's preference for an Exclusive Franchise (given its clear preference for Source Separation). However, the original Program Goals, as approved by the City Council and laid out in the public Scoping documents, stipulated the minimizing of *overall* Vehicle Miles Traveled-- not just an offset of the impacts of the new program.

Therefore, by insisting on a Source Separation mandate under an Exclusive Franchise system, the City is giving up potentially significant reductions in Vehicle Miles Traveled from the current baseline, which was the program's initial intent.

Compared to the No Project alternative, implementing an Exclusive Franchise with a Source Separation mandate (i.e., the Proposed Project) will result in only a marginal 2%

<sup>23</sup> Table 3.1.1-7

<sup>24</sup> Table 3.1.4-3

<sup>25</sup> *loc cit.*

3-14  
(cont'd)

reduction in Vehicle Miles Traveled, but actually increase the number of Vehicle Hours Traveled by 10% and put 27 more trash trucks on the road, an increase of 8.3%.<sup>26</sup>

3-14  
(cont'd)

This important data should be presented in the final Exclusive Franchise EIR in a manner that is clearer and easier to understand.

## **Conclusion**

Athens is encouraged by, and supports, the City's commitment to chart a path to Zero Waste. We stand ready to partner with the City in meeting these ambitious policy goals and it is our hope that the foregoing comments and observations will be received as constructive and positive feedback.

We respectfully recommend that the following steps be taken to strengthen the Exclusive Franchise EIR:

1. The EIR should study an Alternative that reflects the City Council's original intention to set diversion targets and minimize Vehicle Miles Traveled without a Source Separation mandate. While we applaud the City for mandating recycling for all City businesses and multifamily dwellings, the City should exercise flexibility and inclusion of all methods of recycling to reach its goals, particularly those that reduce vehicle miles for maximum environmental benefit.
2. The Exclusive Franchise EIR should track more closely with SWIRP and include the study of Alternatives that involve a role for Mixed Waste processing. An additional alternative should be studied in the Franchise EIR that allows for Black Bin processing.
3. The EIR should acknowledge and include updated data that accurately reflects Athens's infrastructure and capacity, and therefore, its ability to partner with the City in advancing the City's Zero Waste goals.

3-15

<sup>26</sup> Franchise EIR, Charts: 3.1.1-7; 3.1.4-3



4. The lack of discussion and dismissal of Mixed Waste processing in the commercial franchise EIR will inhibit the City's ability to achieve Zero Waste; Mixed Waste processing must be included as a viable solution in the final EIR in order for it to meet the City's Project Goal to be consistent with SWIRP.
5. The environmental impacts of a Source Separation mandate should be presented more clearly and explicitly.

3-15  
(cont'd)

Very truly yours,



Greg Loughnane  
Executive Vice President

## **ADDENDUM A**

On December 20, 2013 Athens Services submitted written comments to the Bureau of Sanitation on Draft Project Environmental Impact Report for the Solid Waste Integrated Resources Plan:

December 20, 2013

Reina Pereira  
Senior Environmental Engineer  
Solid Resources Support Services Division  
Bureau of Sanitation  
1149 South Broadway, 5th Floor  
Mail Stop 521  
Los Angeles, CA 90015

**Re: Comments regarding the Draft EIR for the Solid Waste Integrated Resources Plan**

Dear Ms. Pereira:

Athens Services (“Athens”) is proud to be a long and valued partner with the City of Los Angeles (the “City”), and we are pleased to offer our comments and observations on the Draft Program Environmental Impact Report (“EIR”) for the City’s Solid Waste Integrated Resources Plan (“SWIRP”). These comments are presented in a spirit of cooperation and support for the City as it navigates the difficult process of devising and implementing an efficient, sensible plan for achieving its Zero Waste goals.

At Athens, our primary focus is on landfill diversion and recycling. Our company already has invested tens of millions of dollars in state-of-the-art recycling, composting, and food waste processing infrastructure and technology that we believe can be an important part of the solution to the solid waste challenges facing the City.

While we submit to the City the comments in this letter in their entirety, the following Executive Summary provides a summary of those comments. A more detailed analysis follows the Executive Summary.

## **EXECUTIVE SUMMARY:**

### **I. Infrastructure & Capacity**

The data presented in the EIR describing Athens' waste processing capacity is out of date. We believe an opportunity exists to include updated statistics about current and future waste processing capacity that will be beneficial to the larger policy discussion about the SWIRP plan.

Specifically, Athens has more than 8,000 tons per day (TPD) in waste processing capacity that is unrecognized in the SWIRP EIR. This, alone, represents a significant majority of the City's waste processing needs.

### **II. Flexible Planning for Infrastructure Needs**

The SWIRP EIR demonstrates that Source Separated recycling is hindered by low participation and chronic contamination in the materials collected in the blue bins, which include 25%<sup>27</sup> to 41%<sup>28</sup> residual waste. The contamination results in a lower recovery percentage for Source Separation recycling and it raises questions about the kinds of materials recovery facilities (MRF's) the City will need in the future.

The distinction between "clean" and "dirty" MRF's is becoming less pronounced due to this chronic contamination. Therefore, the City should—in the interest of maximizing diversion-- explore the need for more flexible recycling infrastructure that can process both Source Separated and mixed waste recycling.

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<sup>27</sup> Appendix C, Page C-3-12

<sup>28</sup> Appendix C, Page C-3-5

### **III. An Opportunity to Study More Effective Recycling Methods**

Source Separation has served the City well, and in some cases, may be the best recycling approach for a hauler and its customers. However, the environmental impacts of a Source Separation *mandate* should be weighed against its overall effectiveness in achieving diversion, recovery, and Zero Waste.

The EIR acknowledges that there will be environmental impacts associated with a Source Separation mandate, but states that those impacts are unquantifiable. In the recently released Draft EIR for the Exclusive Commercial Franchise<sup>29</sup> (the “Franchise EIR”), which was published after the SWIRP EIR, the City does quantify the environmental impacts of a Source Separation mandate, and therefore, an opportunity now exists to strengthen the SWIRP EIR by including that data in the final document.

### **IV. Alternative Deserving Further Study**

In the interest of advancing the concept of flexible recycling infrastructure and maximizing diversion, it would be constructive for the final EIR to study an additional alternative, whereby the City requires a specific diversion percentage and gives haulers the flexibility to meet that target using whatever recycling technologies/processes they deem appropriate (*i.e.*, Source Separation, mixed waste processing, or both).

### **SUPPORTING ANALYSIS:**

The following observations and comments seek to expand on the points raised in the Executive Summary:

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<sup>29</sup> [http://san.lacity.org/pdf/2013/Draft\\_Program\\_EIR\\_11182013.pdf](http://san.lacity.org/pdf/2013/Draft_Program_EIR_11182013.pdf)

## I. Infrastructure & Capacity

Athens concurs with the EIR's conclusion that a robust and *flexible* recycling infrastructure is needed for the City to achieve its Zero Waste goals.

As noted in Appendix C of the SWIRP EIR, Athens currently operates two major facilities within the Study Area. However, the SWIRP EIR does not accurately reflect the capacities of these facilities, nor does the EIR take into account our company's ongoing and very significant investments in recycling and diversion.

Athens requests that the EIR be amended to reflect its accurate existing and future capacity.

### *Existing Facilities:*

#### (a) Sun Valley

In the SWIRP Facilities Analysis<sup>30</sup>, Athens' Sun Valley facility is listed as a Solid Waste Processing Facility, permitted for 400 TPD, with expansion plans up to 1,500 TPD, of which the City estimates 250 to 500 TPD can be allocated to meeting the recovery and disposal needs of the City.

The facility presently in construction is designed to be flexible. It can process 1,500 TPD of either mixed waste (all waste disposed of in one bin) or Source Separated materials, from either a commercial/multifamily or a single family residential stream. The 1,500 TPD of flexible capacity can be dedicated entirely to City's needs. (See below for more detail.)

#### (b) City of Industry

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<sup>30</sup> Appendix D, Page D-3-3

The Facilities Analysis describes Athens' facility in the City of Industry as a Transfer Station<sup>31</sup>, when in fact it is a mixed waste processing facility, where transfer activities *may* occur.

Athens' Materials Recovery Facility in the City of Industry is permitted to process 4,000 TPD. This capacity figure will be increased to 5,000 TPD by January 2014. Of this, Athens recovers nearly 30 percent of the materials we process from trash containers, little of which is Source Separated. Approximately 15,000 tons per month of City's one-bin (non Source Separated) commercial and multifamily waste is being delivered to this facility.

(c) Victorville

The Victor Valley Regional Composting Facility ("California Biomass") is identified in the EIR, but the document states that tonnage statistics are not available. In fact, this data is available: This facility, which Athens acquired in 2009, can process 700 TPD of organic materials such as yard trimmings and food waste. Presently over 1,000 tons per month of restaurant food waste from the City is sent to this facility for composting. This facility can take at least 250 TPD more food waste and green waste from the City.

*Planned and Permitted Facilities:*

(a) Expansion of the Sun Valley Materials Recovery Facility

Athens has received approvals from the City to build a new, state-of-the-art Materials Recovery Facility at its Sun Valley location, where Athens' Construction & Demolition processing facility formerly operated. This new facility is designed to be *flexible*, with the ability to process both mixed waste and Source Separated waste streams.

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<sup>31</sup> Appendix C, Page C-1-2

Once built this facility should be able to process 1,500 TPD of mixed waste or Source Separated materials. However, the Facilities Analysis does not recognize this new/additional recycling capacity. Rather, it factors in 500-1,000 TPD as transfer activity. Construction has begun on this facility, which is set to open in 2014.

The EIR does not include this new/additional recycling capacity.

(b) Irwindale

In addition to Athens' Sun Valley and City of Industry operations, our company is in the process of developing a third major Materials Recovery Facility in the city of Irwindale. This facility will use state-of-the art technology to recover the maximum amount of materials possible and minimize residual waste sent to landfills.

The new Irwindale Materials Recovery Facility has full support from the City and the EIR is scheduled to be reviewed and certified in 2014; once approved and built, it will add an additional 6,000 TPD of recycling capacity, which is not reflected in the SWIRP Facilities Analysis.

II. Capabilities: New Technologies, Source Separation, and Mixed Waste Processing

*Investment in New Recycling Technologies:*

Because Athens is a recycling company, first and foremost, and because we do not own landfills, our primary goal is to minimize the residual waste that exits our facilities. Athens currently is studying waste-to-energy, anaerobic digestion technologies that can significantly increase landfill diversion by capturing much of the organic material that remains after standard recycling processes have captured traditional recyclable materials. (See below for more details.)

*Mixed Waste Processing vs. Source Separated Recycling:*

Athens encourages the City to adopt policies that are forward-looking and that acknowledge the proven effectiveness of mixed waste processing, which will continue to improve with time and technology. Committing the City exclusively to Source Separation may result in lost opportunities for diversion and recovery as technology evolves, and also result in more vehicle trips and miles which results in more traffic and pollution.

As it stands, the SWIRP EIR Facilities Analysis shows that the contents of the residential curbside blue bin collection include between 25%<sup>32</sup> to 41%<sup>33</sup> residual waste. In fact, most “clean” MRF’s require solid waste facility permits because of this high level of residual waste. This is evidence that contamination is just as likely to occur in a Source Separated waste stream as in a mixed materials waste stream, thereby blurring the lines between “Clean MRF’s” processing Blue Bin waste, and “Dirty MRF’s” which process the entire waste stream. Existing and new Materials Recovery Facilities must recover more from the waste stream, including recyclable materials and compostable organics.

In fact, the City and Cal Recycle have emphasized that recovery of food waste and organics is one of their highest priorities. Athens is in the process of utilizing techniques and equipment to remove organics from mixed waste streams by processing residual organics that are screened out at our MRF’s, and utilizing them in compost and anaerobic digestion. Clean MRFs that process Source Separated materials cannot accomplish this separation effectively.

Athens contends that the City should “encourage” existing Clean Materials Recovery Facility operators to re-design and operate with an eye towards flexibility, so as to be able to process disparate waste streams and recover more material. It seems

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<sup>32</sup> Appendix C, Page C-3-12

<sup>33</sup> Appendix C, Page C-3-5



counterproductive not to fully utilize MRFs with solid waste facility permits that have the ability to process more diverse waste streams, because more diversion from the waste stream is tantamount to the City meeting its goal.

Therefore, as the City looks to integrate its new Commercial and Multi-Family Franchise system with the SWIRP plan, Athens encourages City leaders to make participants in the process “connect-the-dots” between their proposed Franchise waste-sheds and existing and proposed MRFs that are solid waste processing facilities.

First, the City should establish specific diversion targets for each waste shed. Rather than focusing on “how” haulers achieve those targets, the City’s focus should be “that” they achieve those targets. Haulers should be given the flexibility to employ whatever recycling technologies they determine are best to achieve the diversion targets. This could include both source separation and mixed waste processing.

Second, vertically-integrated companies that have already demonstrated a willingness to invest in the processing and recycling infrastructure described in the EIR and needed to implement SWIRP, are in the best position to assist the City in achieving its Zero Waste goals. They should be treated as partners with the City in the SWIRP process, and be given priority in the subsequent franchise allocation process.

While Athens has made flexibility a priority in its infrastructure development—it is undeniable that companies will factor the degree of certainty about the kind of waste streams they will be required to process into their future infrastructure investment decisions.

Therefore, in order to ensure the kind of recycling infrastructure development the SWIRP EIR concludes is necessary to advance the City’s Zero Waste goals and create green jobs, the City should strive to eliminate uncertainty by adopting a policy that gives companies flexibility to use multiple recycling processes and technologies—including mixed waste processing—to achieve recycling and diversion mandates set by the City.

### III. An Opportunity Missed to Study Most Effective Recycling Methods

As the Bureau of Sanitation has made clear in its call for an “integrated waste management approach<sup>34</sup>,” meeting the City’s Zero Waste goals is a complicated process. At its core, this process is about infrastructure, investment, and jobs, and meeting policy goals that are interrelated.

For decades, Source Separation has been an important part of the City’s recycling programs. It has helped the City reach its 75% Diversion Goal for 2013, and is clearly a favorable alternative to landfilling. Certain Source Separation opportunities exist to service customers effectively, and Source Separation should be included in the City’s recycling plans. However, Athens believes that the EIR should be viewed as an opportunity to evaluate thoughtfully the efficacy and the environmental impacts of Source Separation, as compared to mixed waste processing.

In fact, data presented in the franchise EIR and Appendix C of the SWIRP EIR demonstrates that mixed waste processing can be more effective than Source Separation, particularly in multifamily services. Many apartment associations have gone on record indicating that often apartment buildings have no room for multiple containers, and the logistics of picking up waste and recycling from underground parking garages and chute rooms makes Source Separation impractical and challenging.

#### *Convenient and Effective Recycling Goals:*

In the SWIRP EIR, Alternative 5 (full implementation of SWIRP with no Source Separation mandate) is dismissed as insufficient in meeting the Program Goal to, “*Make the City a leader in implementing Zero Waste practices,*” because this alternative lacks mandatory Source Separation programs.

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<sup>34</sup> October 13, 2103 BOS Staff Report: City’s Recycling (Diversion) Rate – Update Report

Furthermore, it is also declared insufficient in meeting the Program Goal to, *“Find solutions that are both economically efficient and environmentally preferable,”* because it lacks mandatory programs and the concomitant jobs that would be created from the route duplication caused by Source Separation.<sup>35</sup>

We believe these assertions undermine the credibility of the Environmental Review analysis in two ways:

- 1) Making “Mandatory Source Separation” a Goal in and of itself, biases the EIR’s analysis of any Alternatives that do not include a mandate.
- 2) By the City’s own calculations, any of the five Alternatives can achieve the Zero Waste Goal of 90% Diversion, and in a maximum diversion scenario, Alternative 5 achieves the same 98% diversion rate as full implementation of SWIRP.

*Negative Impacts of Source Separation Mandates:*

The SWIRP EIR acknowledges negative impacts of a Source Separation mandate in the areas of air quality, noise and traffic; however, we believe the SWIRP EIR’s analysis of these impacts is inadequate.

For example, in its analysis of mandatory Source Separation programs, the document states:

*“Implementation of this policy/program will result in additional recycled material pick up as the program requires mandatory recycling separation for all waste generators (residential and commercial businesses). This may result in additional blue bin pickups. At this time, the number of trucks and their ultimate destination for the increased blue bin materials is unknown, thus a policy-specific air quality analysis cannot be conducted...”<sup>36</sup>*

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<sup>35</sup> SWIRP Draft Program EIR, Table 5-5-3

<sup>36</sup> SWIRP Program Draft EIR, Table 4.3-14

In fact, the Franchise EIR *does* estimate the traffic impacts of a Source Separation mandate within a franchise when it compares the traffic impacts of “No Project” and a “Non-Exclusive Franchise System” (Franchise EIR Alternative 1).<sup>37</sup>

**TABLE 4-2  
FORECAST 2030 VMT AND VHT**

Alternatives	2030 VMT	% Change	% Change (No Project vs. Project Alternatives)	2030 VHT	% Change	% Change (No Project vs. Project Alternatives)
2012 Existing Conditions	9,143,221			853,608		
2030 Alternatives						
No Project	10,488,034	15%	-	992,597	16%	-
Proposed Project	10,287,273	13%	-2%	1,073,843	26%	10%
Alt 1. Non-Exclusive	16,107,380	76%	61%	1,587,034	86%	70%
Alt 2. Exclusive, Multiple Franchised Haulers	16,056,981	76%	61%	1,582,618	85%	69%
Alt 3. City Collection	10,287,273	13%	-2%	1,073,843	26%	10%

The only relevant difference between “No Project” and “Alternative 1” in the Franchise EIR Analysis is a mandate for Source Separation being imposed on haulers. As the City’s own data shows, that Source Separation mandate will result in a net 61% increase in Vehicle Miles Traveled and 70% increase in Vehicle Hours Traveled, resulting in potentially significant impacts to the environment in terms of transportation.<sup>38/39</sup>

The City’s claim—in the SWIRP EIR—that the additional vehicle miles and hours that would result from a Source Separation mandate are unknown and therefore less than significant, is directly contradicted by the City’s claim in the Franchise EIR that a Source Separation mandate will result in significant increases in vehicle miles and hours--60% and 70%, respectively.

<sup>37</sup> Franchise Draft Program EIR, Page 4-5

<sup>38</sup> Franchise Draft Program EIR, Page 4-11

<sup>39</sup> Were the Franchise EIR to hypothetically analyze a fourth alternative, a non-Exclusive system with mixed waste processing and no Source Separation mandate, the Analysis likely would show roughly the same Vehicle Miles Traveled and fewer Vehicle Hours Traveled than the Proposed Project. Furthermore an exclusive franchise without a Source Separation mandate would result in hundreds of thousands fewer Vehicle Miles Traveled.

Finally, in the Franchise EIR, the City presents data that shows that Source Separation generates lower levels of recovery and contains a high level of contamination<sup>40</sup>:

- An analysis of the data provided in the SWIRP EIR shows that City-operated Source Separated recycling programs recover significantly less materials than mixed-waste processing<sup>41</sup>.
  - i. In 2006, the City's residential curbside program recovered 184,000 tons out of a 1,172,000 ton waste-stream, for a recovery rate of 15.7%<sup>42</sup>
  - ii. In 2006, the City's Multifamily recycling programs recovered 13,000 tons out of a 555,000 ton waste-stream, for a recovery rate of 2.3%<sup>43</sup>
  - iii. The City's Mixed Waste Materials Recovery Facilities are certified to recover between 19% and 32% of the solid waste they process.<sup>44</sup>
  - iv. The "clean MRFs" that process the Bureau's residential curbside blue bin materials report that between 24% and 41% of the waste stream is residual waste. This significant residual waste will lead to contamination of recoverable materials; therefore there is no advantage to Source Separation compared to mixed waste processing in this regard.

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<sup>40</sup> Franchise Draft Program EIR, Page 2-13

<sup>41</sup> The City of Los Angeles does not operate comprehensive commercial recycling services similar to those it offers to residential family curbside and multifamily housing. The data in Appendix C of the SWIRP EIR includes construction and demolition debris in the commercial waste stream, therefore making it impossible to determine the efficacy of voluntary Source Separation in the commercial sector.

<sup>42</sup> SWIRP Draft Program EIR, Pages C-7, C-17-25

<sup>43</sup> *loc cit*

<sup>44</sup> Franchise Draft Program EIR, Page 2-13

*Comparing Source Separation to Mixed Materials Processing:*

A comparative analysis of Source Separation and mixed waste processing demonstrates that a Source Separation mandate shows no benefit in achieving diversion goals, recovers less material, and puts more vehicles on the roads:

	<b>Source Separation Mandate</b>	<b>Mixed Materials Processing</b>
Does it meet the City's Zero Waste Goals?	YES	YES
Maximum Diversion Estimated by SWIRP EIR	98%	98%
Net Increase in Vehicle Miles Traveled	61%	-
Net Increase in Vehicle Hours Traveled	70%	-
Recycling Recovery Rate	Residential Curbside: 15.7% Multi-Family Blue Bin: 2.3%	Materials Recovery Facilities Certified to recover: 19% to 32%

Source Separation has served the City well, and in some cases, such as certain office or manufacturing environments, may be a preferred option for a hauler and its customers. However, the environmental costs of a Source Separation mandate should be weighed against its comparative efficacy in achieving diversion, recovery and Zero Waste.

In light of, what we believe to be the SWIRP EIR's deficiencies in adequately studying the environmental impacts of the route duplication caused by Source Separation mandates, and data showing that mixed waste processing is more effective at recovering materials than source separation, Athens requests that the City further study an Alternative which mandates performance by setting diversion percentages with which haulers must comply, but that gives haulers the flexibility to determine how best to meet those percentages through technologies and processes of their choosing.

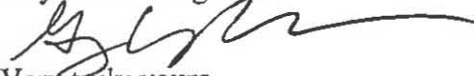
## CONCLUSION

Athens supports, the City's commitment to chart a path to Zero Waste. The various Alternatives that were studied in the EIR all accomplish the fundamental Zero Waste goal of 90% diversion, and multiple Alternatives reach a maximum of 98% diversion. The environmental review process, therefore, should be given great weight by the City.

With respect to the EIR, Athens respectfully suggests:

1. The EIR should be amended to accurately reflect Athens'-- as well as other facilities-- current and future waste processing capacity.
2. The EIR should study an additional alternative, whereby the City sets a specific diversion percentage and gives haulers the flexibility to meet that target using whatever recycling technologies/processes they deem appropriate.
3. The EIR is deficient in its study of the environmental impacts of a Source Separation recycling mandate because there is new data submitted in the Franchise EIR that is not included in the SWIRP EIR.
4. The City should encourage more processing at existing Materials Recovery Facilities that can be re-tooled and re-permitted to process both mixed waste and Source Separated materials. This will maximize diversion and avoid the difficulty of siting new facilities.

Athens reiterates its desire to be a valued partner with the City and we look forward to engaging in a productive dialogue that will result in the most effective, efficient, and environmentally sound solution to the solid waste challenges facing the City of Los Angeles.

  
Very truly yours,

Greg Loughnane  
Executive Vice President

## LETTER 3

### Athens Services

Specific responses to comments from the Athens Services comment letter, dated January 9, 2014, are provided below.

#### Response to Comment 3-1

The City recognizes that Athens Services owns and operates one of the largest Material Recovery Facilities (MRF) in the LA region, City of Industry MRF, designed to process mixed waste (black bin material) and that Athens plans to open two new mixed waste MRF's in Sun Valley, California and Irwindale, California. The City also understands that Athens Waste maintains multiple solid waste franchises in which it utilizes its City of Industry mixed waste MRF for diversion.

The City appreciates Athens desire to help meet future waste diversion goals. As a point of clarification, it appears the commenter is under the belief that the Proposed Project seeks to meet the waste diversion goals strictly through source separation by the customer through a three bin system, and if so, this is not an accurate understanding of the Proposed Project. As noted in Section 3.6.1 of the Franchise Implementation Plan (FIP), Appendix B, source separation (Blue Bin recycling) is the minimum level of recycling under the Proposed Project. Section 3.6.2 of the FIP details the requirements for diversion of organic waste through a Green Bin collection program. As noted in Section 3.6.4 of the FIP, franchised waste haulers will be encouraged to exceed minimum diversion target by including innovative programs. The Proposed Project anticipates and will allow other types of innovative diversion programs in addition to source separation, which may include further processing of Black Bin material, to assist haulers in achieving the higher goals of Zero Waste. It should be noted that mixed waste processing of Black Bin material is not the only diversion option that Franchise haulers can employ.

The commenter suggests that the FIP, and by inference the Proposed Project, is not consistent with the November 2012 Council Committee Majority Report goals. As a point of clarification, the November 12, 2012 program goals referenced by the Commenter are actually strategy recommendations the Council Committee wanted developed, in the form of an Implementation Plan, and formed the general framework for the Proposed Project as described in the Notice of Preparation (NOP). During the development of the Implementation Plan, Sanitation reached out to various stakeholders, and considered their input in developing the FIP. In addition, as noted in Section 2.2.1, multiple meetings were held regarding the FIP, including discussions by City Council's joint Energy and Environment and Ad Hoc on Waste Reduction and Recycling Committees leading up to the April 24th Council Action. The actual goals for the Franchise Program, as detailed in the FIP, were adopted by the City Council on April 24, 2013, not November 12, 2012. The Proposed Project described in the Draft Program EIR is consistent with Program Goals adopted by City Council for the Franchise Program, as described in the Implementation Plan, included as Appendix B. Based on this, the commenter's opinion that the Draft Program EIR fails to study the program approved by City Council is inaccurate.

#### Response to Comment 3-2

The City agrees with Athens that other innovative programs, in addition to Source Separation, may be necessary to meet its Zero Waste Goals. As discussed in Responses 3-1, source separation forms the foundation of the diversion programs under the Proposed Project. Other types of innovative diversion programs, including mixed waste processing of Black Bin material, may be allowed, in addition to the requirements of source separation, see Section 3.6.4 of the FIP.



### Response to Comment 3-3

As discussed in the response to Comment 3-1 above, the NOP, Scoping Process, and Draft Program EIR are consistent with the direction of City Council.

### Response to Comment 3-4

It appears that the commenter has some misunderstandings about the City's Solid Waste Integrated Resources Plan (SWIRP) and the Proposed Project's relationship to the SWIRP.

Section 2.6.2 of the Draft Program EIR, provides a summary of SWIRP, which is the long-range master plan for Solid Resources management in the City of Los Angeles. The Draft Program EIR provides an overview of the policies, programs, and facilities that would be required through 2030 under SWIRP, and describes the relationship of the FIP to SWIRP (i.e., the FIP is a component of SWIRP).

The commenter states that SWIRP "...requires the processing of single-stream Black Bin waste (i.e., all waste disposed of in a single container and taken to a MRF)." This comment appears to be a misunderstanding. The SWIRP EIR (page ES-7) describes Black Bin facilities as:

*"Facilities capable of processing residual waste from residential black bins, commercial waste sources, or residual waste from processing facilities described above. These facilities are also known as alternative technology facilities. Examples of black bin facilities include, but are not limited to, automated mixed material processing facilities, advanced thermal recycling (second generation waste-to-energy), thermal facilities (such as gasification and pyrolysis), and anaerobic digestion facilities for residual waste."*

The SWIRP EIR (page ES-7) further states:

*"Black bin processing facilities target residential and commercial residual waste, and residual waste that remains after recycling and composting (materials disposed of in blue bins and green bins that are unsuitable for processing)."*

Contrary to the comment, SWIRP does not require all waste disposed of in a single container to be taken to a MRF.

As discussed in the response to Comment 3-1 above, the Proposed Project anticipates and will allow other types of innovative diversion programs in addition to source separation, which may include further processing of Black Bin material, to assist haulers in achieving the higher goals of Zero Waste as noted in Section 3.6.4 of the FIP.

Regarding the comment that an additional alternative should be studied in the Program EIR that requires Black Bin processing of materials before being sent to a landfill, Section 2.5.4.4 of the Draft Program EIR, discusses an alternative that would implement only mixed-waste MRF processing, and determined that such a program would not meet the City's Zero Waste Goals. As discussed in response to Comment 3-1, under the Proposed Project, the three collection streams for Blue Bin, Green Bin, and Black Bin materials form the foundation of the diversion programs under the Proposed Project, and that other types of diversion programs, including mixed waste processing of Black Bin material after source separation, would be allowed as haulers reach for the higher goals of Zero Waste and the diversion targets that will be included in the Franchise agreements.

### Response to Comment 3-5

The Proposed Project, which includes collection of Blue Bin, Green Bin, and Black Bin materials separated at the generation sources, would result in an increase in Vehicles Miles Traveled compared to the baseline.

However, the air quality and traffic evaluations in the Draft EIR determined that the collection activities would not result in significant air quality and traffic impacts, although the potentially significant impacts to these resource areas associated with new processing facilities and truck base yards were identified in the Draft Program EIR.

As discussed in the response to Comment 3-1, the processing of Black Bin materials at mixed waste facilities would be allowed under the Proposed Project. In addition, and as discussed under the response to Comment 3-4, the Proposed Project is consistent with SWIRP.

The commenter attempts to compare the diversion potential to a source separated only program to a mixed waste processing system. However, the Proposed Project recognizes the need for various diversion strategies. A source separated system as the base diversion strategy coupled with innovative programs, such as mixed waste processing of the Black Bin material, allows the City to reach its maximum diversion potential and its Zero Waste goal.

#### Response to Comment 3-6

The City would like to thank Athens for providing updated capacity information for their existing and planned mixed waste and organics capabilities. The updated capacity is included in the administrative record. Section 2.4.2 of the Draft Program EIR includes a facility capacity analysis to help identify future capacity shortfalls and to help understand when new organic and material processing facilities would be needed. As discussed in Section 2.4.2 of the Draft Program EIR, existing material processing capacity is available for the initial implementation of the Franchise program. The updated processing capacity information provided by the commenter may have the effect of potentially delaying the need for new processing facilities to be permitted, built and become operational, and this would not change the impact determination in the Draft Program EIR.

#### Response to Comment 3-7

As discussed in the response to Comment 3-1, the processing of Black Bin materials at mixed waste facilities to meet the diversion targets in the Franchise Agreements would be allowed under the Proposed Project.

#### Response to Comment 3-8

The Draft Program EIR evaluates the Proposed Project relative to the baseline conditions. CEQA requires the evaluation of the whole of a project, not the evaluation of a portion of the project. However, for ease of understanding what the impacts of the key parts of the Proposed Project, the impact evaluations in the Draft Program EIR focus on the primary activities that have the potential to result in physical impacts to the environment, namely the collection activities and new or expanded facilities and truck base yards. Table 3.1.4-3 details the VMT and VHT of the Proposed Project, no project and alternatives, while Table 3.1.4-4 details the VMT and VHT of the new diversion programs under the Proposed Project.

#### Response to Comment 3-9

Regarding the comment that the original November 2012 City Council action called for Sanitation to develop an Exclusive Franchise Implementation Plan that set diversion targets and minimized vehicles miles traveled, the actual details of the Proposed Project are contained in the FIP approved by City Council on April 24, 2013 (please see the response to Comment 3-1) and included source separation while requiring routing efficiencies in the Franchise agreements. Regarding the comment that the City Council changed the nature of the Franchise program it previously adopted, please see the response to Comment 3-1.

Regarding the comment that the City Council did not intend to mandate Source Separation because it also sought to minimize VMTs, and that it is reasonable to infer that City Council's intent was to provide haulers the flexibility to use whatever recycling technologies they deem best to comply with specific diversion

targets, please see the response to Comment 3-1. Further, the approved Implementation Plan would better serve as a gauge of City Council's intent than the several select elements in the comment letter.

Regarding the comment that the Franchise Program DEIR included an alternative that reflects the City Council's original intent to set diversion targets and minimize VMTs, please see the first paragraph of this response to Comment 3-9. The Proposed Project and other Alternatives (except the No Project Alternative) include diversion targets and VMT minimization requirements, within the framework of their respective waste collection and handling program. In addition, as discussed in the response to Comment 3-1 above, the Proposed Project includes source separation and allows mixed waste processing of Black Bin materials.

#### Response to Comment 3-10

Regarding the comment that the Proposed Project ignores any and all Black Bin Processing options and that it conflicts with the SWIRP, please see the responses to Comment 3-1 and Comment 3-4 above.

#### Response to Comment 3-11

As noted in response to comment 3-1, the City recognizes that innovative programs in addition to source separation may be needed to achieve the City's Zero Waste goals. The Proposed Project allows haulers to propose other innovative diversion programs. In addition, as noted in the response to Comment 3-5, a source separated system as the base diversion strategy coupled with innovative programs, such as mixed waste processing of the Black Bin material, allows the City to reach its maximum diversion potential and its Zero Waste goal.

#### Response to Comment 3-12

Please see the response to Comment 3-6 above.

#### Response to Comment 3-13

As noted in response to Comment 3-1, the City recognizes that innovative programs in addition to source separation may be needed to achieve the City's Zero Waste goals. The Proposed Project allows haulers to propose other innovative diversion programs. In addition, as noted in the response to Comment 3-5, a source separated system as the base diversion strategy coupled with innovative programs that may include mixed waste processing of the Black Bin material, allows the City to reach its maximum diversion potential and its Zero Waste goal. As such a system that allowed for mixed waste processing alone would not meet the Zero Waste Goals, and the alternative in Section 2.5.4.4 was therefore eliminated from further consideration. The Alternative considered in Section 2.5.4.5 was comprised of components similar to the mixed waste only alternative and the Proposed Project.

#### Response to Comment 3-14

Please see the responses to Comments 3-1 and 3-8 above.

#### Response to Comment 3-15

The City appreciates the commenter's thought and input in the environmental process, and the highlights of its previous comments. The City also looks forward to reviewing any proposals put forth by the commenter, should City Council decide to move forward with a franchised waste program. Regarding the inclusion of comments on the SWIRP EIR, those comments will be responded to as part of SWIRP's environmental process.



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dignityhealth.org

**Via Email to: [daniel.meyers@lacity.org](mailto:daniel.meyers@lacity.org)**

January 8, 2014

Dan Meyers  
Department of Public Works  
City of Los Angeles  
1149 South Broadway, Suite 10  
Los Angeles, CA 90015

**RE: Draft Program Environmental Impact Report (PEIR)**

Dear Mr. Meyers:

On behalf of Dignity Health, thank you for the opportunity to comment on the draft Program Environmental Impact Report (PEIR). We very much appreciate the time and effort the Bureau of Sanitation staff has invested in developing a report that analyzes the potential environmental impacts associated with the proposed Citywide Exclusive Waste Franchise System.

Dignity Health, one of the nation's five largest health care system, is a 21-state network of nearly 9,000 physicians, 55,000 employees, and more than 380 care centers, including hospitals, urgent and occupational care, imaging centers, home health, and primary care clinics. Dignity Health, headquartered in San Francisco, has 31 hospitals in California, two of which are in the City of Los Angeles. Dignity Health is dedicated to providing compassionate, high-quality and affordable patient-centered care with special attention to the poor and underserved. In 2013, Dignity Health provided nearly \$1.7 billion in charitable care and services.

Committed to our healing mission, our values call us to steward our resources, effectively manage our waste while continually seeking ways to minimize the health care footprint on our planet, contribute to the overall health and well being of the communities we serve, including caring for the environment. Dignity Health strives to advance our healing ministry in a manner that benefits the common good now and in the future. Our sustainability effort during this unprecedented time of health care reform is both challenging and a tremendous opportunity to usher a transformed system that meets the triple aims of 1) improving quality of care; 2) improving population health; 3) bending the health care cost curve. We seek partnership with the City to recognize that our healing mission is not delivered in isolation but within a community that fully appreciates the complexities of the highly regulated environment in which we must operate, as well as the ever increasing demands and needs of patients and the broader community. Change imposed upon us that undermines hospitals' ability to deliver on our promise of care is not transformation. It's careless.

Dignity Health takes seriously its leadership role in healthcare environmental and sustainability efforts. That is why, we have contracted with a single company to provide an Integrated Waste Solutions for our

system. Not only have we been able to gain significant savings in doing so, but our hospitals have over the years been able to build a trust and confidence with our haulers that ensures our waste hauling needs are met in a manner that is aligned with our environmental and sustainability principles. It is our deepest hope that any plan implemented by the City will not take away from the tremendous progress we've made to date.

Having said that, Dignity Health is also encouraged by the City's leadership and is fully supportive of the ten goals associated with Zero Waste, including waste diversion and mandatory recycling; improved health and safety for solid resource workers; improved air quality; and equitable rates and contingency plans to ensure reliable service. The unique manner in which this policy impacts hospitals has compelled Dignity Health, in collaboration with the Hospital Association of Southern California (HASC) and its member hospitals, to actively participate in the City's process. We have worked with Bureau staff, provided a tour at one of our hospitals, testified at hearings, met numerous times to gain insight into the planning effort as well as solutions to our ongoing concerns.

The Draft PEIR provides a historical overview and clearly explains the process that was used in evaluating the environmental impact for each of the three alternative options. However, the report lacks detail for how the Bureau intends to mitigate the ongoing concerns raised by the hospital community. Dignity Health stands with HASC in expressing the following concerns:

**1. Hauler Selection: Hospitals' Role in the Selection Process; Requirements for Background Check**

- How can hospitals be assured that haulers have the experience and ability to meet our special needs if we are not part of the selection process? Haulers will be evaluated and ranked on their ability to achieve the City's goal of Zero Waste. However, the report does not address whether haulers will be evaluated on prior experience and their specific abilities to meet the unique environmental and service needs of a hospital. We urge that hospitals be included in the selection process.
- Will the City require a background check? This issue is not evaluated in the Draft PEIR. However, it is important enough to highlight given that some hospitals have adopted this as a policy and procedure that is subject to an audit by a federally approved accrediting entity. Failure to comply could result in the accrediting body to issue a deficiency notice to the hospital for which the Bureau could be held accountable.

4-1

**2. Service Needs: Impact to Public Health, Traffic, Noise and Air Pollution**

- How will the Bureau ensure that regular pick-ups are timely; and preserve a hospital's ability to request an emergency pick-up that minimizes a hospital's exposure to a citation or closure by Public Health in a surge event? Under the current proposal, a hauler is accountable only to the Bureau. Any delay in pickups will increase risk of occupational injury to waste handlers, as well as result in an increase in emissions and odors from uncontained waste due to the delays.
- How will deviation or lack of compliance with schedules be handled? Limited dock space and hospital campus safety necessitate that tight timeframes for waste picked-up be agreed upon. Hospitals are concerned that deviation or lack of compliance with scheduled pick-up could result in traffic build-up and increased noise and air pollution in surrounding streets. Hospitals need assurance and a process to mitigate unforeseen deviation/non-compliance.

4-2

**3. Monitoring and Enhancing Hospitals' Waste Program**

- Will our hospitals continue to receive detailed log on how and where hospital generated waste is treated and the location of disposal? The Draft PEIR highlights the issue, but fails to provide assurance that hospitals can continue to expect these reports that are important in an

4-3

- audit from regulators and accreditation agencies given the Bureau's lead negotiating role. These reports are also critical to our ability in assessing and evaluating our program.
- How will hospitals improve upon their waste program under a standardized recycling program? The draft PEIR seeks to institute a standardized recycling program that holds the unintended consequence of undermining matured / innovative recycling programs and inhibiting the growth of waste to energy technology. Dignity Health wishes to preserve the successes we've made over the years while seeking innovations that will ultimately support the sustainability of our healing mission.

4-3  
(cont'd)

Thank you for the opportunity to provide our comments. Dignity Health looks forward to continuing our work with the Bureau in developing a program that drives toward Zero Waste while affording our hospitals the flexibility to achieve these goals without compromising the sustainability of their healing mission.

Please do not hesitate to reach me at [rachelle.wenger@dignityhealth.org](mailto:rachelle.wenger@dignityhealth.org) or 626.744.2209 should you have any questions or if Dignity Health can be of resource to you.

Sincerely,



Rachelle Reyes Wenger  
Director, Public Policy & Community Advocacy

## LETTER 4

### Dignity Health

Specific responses to comments from the Dignity Health comment letter, dated January 8, 2014, are provided below.

#### Response to Comment 4-1

This comment does not raise an environmental issue. The comment addresses program implementation issues such as customer service, response time, and contingency plans. However, the City offers the following for clarity to the commenter:

The Proposed Project includes the program elements of the Franchise Implementation Plan (FIP), as approved by the City Council on April 13, 2013 (Council file number 10-1797-S15). The Proposed Project recognizes the unique needs of hospitals, as detailed in Section 3.7.2 of the FIP. As noted in Section 3.7.2 of the FIP, the franchise agreement will address the needs of the hospitals. The Request for Proposals and subsequent franchise agreements, established as part of the Proposed Project, will include at a minimum the following provisions for hospitals:

- Prescribed response time
- Specific collection windows
- Collection windows (often hospitals need waste picked up within a predetermined window)
- Response procedures for emergency situations (such as hazardous waste commingled with solid waste)
- Prioritize provision of alternative haulers for hospitals in the event of any interruption in operations of the franchisee, for any reason, including but not limited to business failure, natural disaster, or a labor dispute
- Customer service procedures
- Reporting
- Technology support (such as auto-dialers)

Also, as noted in Section 3.5.1 of the FIP, the franchisee agreements will include a list of unique waste services that customers can use to build collection programs that meet their specific needs. In addition to the above franchise contract requirements, as noted in Section 3.5.3 of the FIP, franchised waste haulers must maintain a contingency plan in the event of emergency or service disruption, with penalties up to and including termination of the franchise contract for failure to comply. Further, as discussed in Section 3.7.2 of the FIP, hospital needs are to be addressed as part of the Franchise Service requirements.

It is also important to note that much of the material generated at hospitals is exempt from the proposed franchise structure, as noted in Section 3.7.1 of the FIP. The collection of recyclables that have value to generator and are sold or donated, construction and demolition waste, electronic waste, medical waste, pharmaceutical, and other hazardous waste is not included under the proposed franchise system. Hospitals will continue to secure vendors to collect exempted material, not necessarily the franchisee in their zone.

#### Response to Comment 4-2

Although this question indicated it was addressing environmental impacts to Public Health, Traffic and Noise, it actually addressed program implementation issues such as customer service and collection response time. This comment does not raise an environmental issue. However, the City offers the following for clarity to the commenter:

See response to Comment 4-1. As noted in response to Comment 4-1 franchise agreements will include prescribed response time and collection windows necessary for hospitals. It should also be noted that under the Proposed Project, Franchise Haulers will also be accountable to their customers.

**Response to Comment 4-3**

This comment does not raise an environmental issue. The comment addresses program implementation issues such as reporting and recycling requirements. However, the City offers the following for clarity to the commenter:

See response to Comment 4-1. As noted in response to comment 4-1 franchise agreement will include reporting requirement as necessary for hospitals. In addition, the franchise will not include recyclables that have value to generator (such as hospitals) and are sold or donated.



January 9, 2014

Comment letter #5

Dan Meyers  
Department of Public Works  
City of Los Angeles  
1149 South Broadway, Suite 10  
Los Angeles, CA 90015

**RE: Draft Program Environmental Impact Report (PEIR)**

Dear Mr. Meyers,

The Hospital Association of Southern California (HASC) which represents over 40 hospitals within the City of Los Angeles appreciates the opportunity to provide comment on the Draft Program Environmental Impact Report (PEIR). In providing comment, HASC also wishes to acknowledge the Bureau of Sanitation staff that has invested time in developing a report that analyzes the potential environmental impacts associated with the proposed Citywide Exclusive Franchise System.

Hospitals are fully supportive of the ten goals associated with Zero Waste and strive toward their appropriate implementation within the existing regulatory environment; which is distinctly unique from other business sectors that include office and retail stores. These goals include: waste diversion and mandatory recycling; improved health and safety for solid resource workers; improved air quality; and equitable rates and contingency plans to ensure reliable service. The unique manner in which this policy impacts hospitals has required HASC to be actively involved in the process by meeting with Bureau staff to gain insight into the planning effort as well as attempt to gain solutions to our ongoing concerns.

The Draft PEIR provides a historical overview and clearly explains the process that was used in evaluating the environmental impact for each of the three alternative options. However, the report lacks detail for how the Bureau intends to mitigate the ongoing concerns raised by the hospital community:

1. Public Health: Hospitals have a low tolerance for the accumulation of solid waste. How will the Bureau ensure that regular pick-ups are timely; and preserve a hospital's ability to request an emergency pick-up that minimizes a hospital's exposure to a citation or closure by Public Health in a surge event? Hauler is accountable only to the Bureau under the current proposal. Any delay in pickups will increase risk of occupational injury to waste handlers, as well as result in an increase in emissions and odors from uncontainerized waste due to the delays.
2. Monitoring and Reporting: Hospitals require that their contracted hauler provide a detailed log on how and where hospital generated waste is treated and location of disposal. The Draft

5-1

5-2

PEIR highlights the issue, but fails to provide assurance that hospitals can continue to expect these reports that are important in an audit from regulators and accreditation agencies given the Bureau's lead negotiating role.

5-2  
(cont'd)

3. Hauler Selection: Haulers will be evaluated and ranked on their ability to achieve the City's goal of Zero Waste. However, the report does not address whether haulers will be evaluated on prior experience and their specific ability with meeting the unique environmental and service needs of a hospital. Therefore, it's recommended that hospitals be included in the selection process.

5-3

4. Service: Limited dock space and hospital campus safety necessitate that tight timeframes for waste pick-up be agreed upon. Hospitals are concerned that deviation or lack of compliance with scheduled pick-up could result in traffic build-up and increased noise and air pollution in surrounding streets.

5-4

5. Vendor Background Check: This issue is not evaluated in the Draft PEIR. However, it is important enough to highlight given that some hospitals have adopted this as a policy and procedure that is subject to an audit by a federally approved accrediting entity. Failure to comply could result in the accrediting body to issue a deficiency notice to the hospital for which the Bureau could be held accountable.

5-5

6. Recycling & Waste to Energy: Draft PEIR seeks to institute a standardized recycling program that holds the unintended consequence of undermining matured / innovative recycling programs and inhibit the growth of waste to energy technology. Hospitals recycle pursuant to standard and regulations imposed on them for public health reasons. Compromising those procedures can have a negative impact on not only the overall goals of the Zero Waste policy, but on the nearby environment as well.

5-6

HASC again appreciates the opportunity to provide comment and looks forward to continuing to work with the Bureau on developing a program that drives toward Zero Waste while affording hospitals the flexibility to achieve these goals within the regulatory environment in which they operate.

Sincerely,



JAIME GARCIA  
Regional Vice President  
Hospital Association of Southern California

## LETTER 5

### Hospital Association of Southern California

Specific responses to comments from the Hospital Association of Southern California comment letter, dated January 9, 2014, are provided below.

#### Response to Comment 5-1

This comment does not raise an environmental issue. The comment addresses program implementation issues such as customer service, and response time. However, the City offers the following for clarity to the commenter:

The Proposed Project includes the program elements of the Franchise Implementation Plan (FIP), as approved by the City Council on April 13, 2013 (Council file number 10-1797-S15). The Proposed Project recognizes the unique needs of hospitals, as detailed in Section 3.7.2 of the FIP. As noted in Section 3.7.2 of the FIP, the franchise agreement will address the needs of the hospitals. The Request for Proposal and subsequent franchise agreements, established as part of the Proposed Project, will include at a minimum the following provisions for hospitals:

- Prescribed response time
- Specific collection windows
- Collection windows (often hospitals need waste picked up within a predetermined window)
- Response procedures for emergency situations (such as hazardous waste commingled with solid waste)
- Prioritize provision of alternative haulers for hospitals in the event of any interruption in operations of the franchisee, for any reason, including but not limited to business failure, natural disaster, or a labor dispute
- Customer service procedures
- Reporting
- Technology support (such as auto-dialers)

Also, as noted Section 3.5.1 of the FIP, the franchisee agreements will include a list of unique waste services that customers can use to build collection programs that meet their specific needs. In addition to the above franchise contract requirements, as noted in Section 3.5.3 of the FIP, franchised waste haulers must maintain a contingency plan in the event of emergency or service disruption, with penalties up to and including termination of the franchise contract for failure to comply.

It is also important to note that much of the material generated at hospitals is exempt from the proposed franchise structure, as noted in Section 3.7.1 of the FIP. The collection of recyclables that have value to generator and are sold or donated, construction and demolition waste, electronic waste, medical waste, pharmaceutical, and other hazardous waste is not included under the proposed franchise system. Hospitals will continue to secure vendors to collect exempted material, not necessarily the franchisee in their zone.

#### Response to Comment 5-2

This comment does not raise an environmental issue. The comment addresses the program implementation component of reporting. However, the City offers the following for clarity to the commenter:

See response to Comment 5-1. As noted in response to Comment 5-1 the Franchise contract will include reporting requirement as necessary for hospitals.

#### Response to Comment 5-3

This comment does not raise an environmental issue. The comment addresses the program implementation issue of hauler selection. However, the City offers the following for clarity to the commenter:

See response to Comment 5-1. Proposers will need to include their experience and address how the hospitals needs will be met.

#### Response to Comment 5-4

This comment does not raise an environmental issue. The comment addresses the program implementation issue of timely service. However, the City offers the following for clarity to the commenter:

See response to Comment 5-1. As noted in response to Comment 4-1 franchise agreements will include prescribed response time and collection windows necessary for hospitals.

#### Response to Comment 5-5

This comment does not raise an environmental issue. The comment addresses the program implementation issue of vendor background checks. However, the City offers the following for clarity to the commenter:

See response to Comment 5-1. The franchise agreement will address the service requirements of hospitals including the necessity for employees and backups that are certified and trained for on-site operations, and employ background checks.

#### Response to Comment 5-6

This comment does not raise an environmental issue. The comment addresses the program implementation issue of timely service. However, the City offers the following for clarity to the commenter:

See response to Comment 5-1. The franchise agreement will address the service requirements of hospitals and maintain compliance with all State and Federal regulation. In addition, the franchise will not include recyclables that have value to generator (such as hospitals) and are sold or donated. The Proposed Project will maintain and improve the level of service provided to customers. The specialized needs and requirements of hospitals will be met by the haulers under the franchise agreements. Under the Proposed Project customers will have access to and the use of a broad range of services, and franchise haulers will be required to provide on-site customer assistance to support customer ongoing programs including recycling and diversion programs.





Comment letter #6

January 10, 2014

Mr. Daniel Meyers  
Senior Civil Engineer, Solid Resources Citywide Recycling Division  
Bureau of Sanitation  
1149 S. Broadway  
5th Floor  
Mail Stop 944  
Los Angeles, CA 90015

Dear Mr. Meyers:

On behalf of the Hollywood Chamber of Commerce and its nearly 900 members, I am writing to voice our concerns with the City's Draft Program Environmental Impact Report (PEIR) for the "Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling."

Local business owners drive Los Angeles' economy day in and day out. Many businesses require special attention from their waste haulers who understand business operations needs and are capable of meeting the unique needs of certain businesses like restaurants, high rises and apartment complexes. As you move forward with this process, the Chamber asks that you take precautions to protect LA businesses from shouldering the burden of significant rate increases that are likely to arise from implementation of this exclusive franchise system. As currently drafted, the EIR assumes that service rates to Commercial Establishments may be increased annually. Small and large businesses alike need to be able to project their budget expenditures well in advance. Allowing for unknown fluctuation of the waste hauler's service rates annually, will be a consistent problem for businesses across LA, many which are already struggling day to day to meet operational costs.

6-1

The EIR's assumptions regarding source sorting of waste may also be burdensome for many of our City's businesses and is not consistent with the program adopted by the City Council. As reflected in the Council action, the EIR should include an off-site sorting alternative for businesses.

6-2

Of special concern to the Chamber are the impacts of the proposal on the major entertainment studios located in Hollywood, including Paramount Pictures and the Sunset-Bronson & Sunset-Gower Studios. The operational needs of our entertainment studios are very specific and quite different from those of other businesses. Again, the Chamber asks that the EIR reflect the Council's action which allows studios to choose from among the various zones' waste haulers in order to ensure that the hauler is able to meet each studio's specific waste hauling needs.

6-3

As you know, studios often film on location. Productions will necessarily vary in their size and scope and will have individual and specific waste needs. It is impractical for location shoots to comply with the Waste Franchise ordinance. The Council recognized this and exempted on-location trash hauling from the program. The EIR should reflect this additional element of the Council's action. As you move forward with this process the Chamber asks that you take precaution to protect the operational needs of Hollywood's vital entertainment industry.

6-3  
(cont'd)

The Chamber continues to believe that quality of service is directly related to competition. With competition among vendors removed from the proposed exclusive system, the Chamber asks that the Council do all it can to ensure that there are adequate procedures in place to address problems that arise between waste service providers and the business that they will be serving.

6-4

The franchise of the City's waste hauling services will have wide impacts throughout Hollywood and all of Los Angeles. We understand and support the City's policy goals, but we want to see them happen in the most efficient way possible. As currently drafted, the EIR remains burdensome and potentially detrimental to many of our city's businesses. We urge the City to take into consideration the Chamber's concerns as this franchise program moves forward. We look forward to working with you in developing a waste hauling program that serves all of the diverse needs of the L.A. business community.

Sincerely,



Leron Gubler  
President & CEO

## LETTER 6

### Hollywood Chamber of Commerce

Specific responses to comments from the Hollywood Chamber of Commerce comment letter, dated January 10, 2014, are provided below.

#### Response to Comment 6-1

This comment does not raise an environmental issue. The comment addresses the program implementation issues customer service and rates. However, the City offers the following for clarity to the commenter:

As detailed in Section 3.5 of the FIP, the Proposed Project will ensure a high level of customer service, including consistent delivery, prompt correction of issues, and convenience. Specialized customer needs will be met by the haulers under the franchise agreements. The City will provide tools for communication that match customer needs, from live call center operators, to online communication through e-mail or text message, and potentially other technical communication methods so that customers can send and receive timely information. To provide an incentive to the franchise haulers, liquidated damages for poor service will be included in the franchise agreements, and an annual review will be conducted on franchise performance measures. Under the Proposed Project customers will have access to and the use of a broad range of services, and franchise haulers will be required to provide on-site customer assistance to support customer recycling efforts. In addition, the franchise program will include processes and systems to ensure timely resolution and response to customer requests and complaints.

Customers served by the franchise system will benefit from a consistent program which does not depend on service location. Service locations throughout the City will have access to the same programs, with similar rates, for the same types of services. The City seeks to create an equitable rate system to aid in customer service and transparency, and to eliminate variations that would create confusion. Rates will change predictable throughout the term of the franchise agreements, with limited increases that are reviewed and approved by the Bureau of Sanitation.

#### Response to Comment 6-2

The comment primarily addresses the program implementation issue of recycling services. However, the City offers the following for clarity to the commenter:

As noted in Section 3.6.1 of the Franchise Implementation Plan (FIP), Appendix B, source separation (Blue Bin recycling), is the minimum level of recycling under the Proposed Project. Section 3.6.2 of the FIP details the requirements for diversion of organic waste through a Green Bin collection program. As noted in Section 3.6.4 of the FIP, franchised waste haulers will be encouraged to exceed minimum diversion target by including innovative programs which may include additional programs for offsite separation of mixed waste (black bins) after source separation (blue bins).

In addition, Section 2.5.4.4 of the Draft Program EIR evaluated a mixed-waste alternative.

#### Response to Comment 6-3

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how studios unique needs are met in the Proposed Project. However, the City offers the following for clarity to the commenter:

The Proposed Project includes the recommendation for studios, as detailed in Section 3.7.4 of the FIP. Under the Proposed Project, each studio will be required to select one of the haulers awarded a franchise by the City; however, the selected franchise hauler does not necessarily need to be the hauler selected for the franchise

zone in which the studio is located. The franchise hauler selected by a studio shall be required to meet the waste diversion, accurate reporting, payment of fees, and clean air vehicles, along with all other requirements of the City's franchise agreement.

As approved by the City Council on April 24, 2013, Council File (CF) Number 10-1797-S15 (see Attachment 7-1A), Solid Resources generated by on-location filming, is excluded from the Proposed Project as on-location filming is not defined as a commercial establishment.

**Response to Comment 6-4**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of customer service. However, the City offers the following for clarity to the commenter:

See response to Comment 6-1.





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**MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

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SHERMAN OAKS, CA 91403

Main: (818) 995-6600

Comment letter #7

**MELISSA PATAK**

Vice President & Senior Counsel

State Government Affairs

818.935.5838 – direct

818.292.2784 – cell

Melissa\_Patak@mpaa.org

January 8, 2014

Mr. Daniel Meyers

Senior Civil Engineer, Solid Resources Citywide Recycling Division

Bureau of Sanitation

1149 South Broadway, 5th Floor, Mail Stop 944

Los Angeles, CA 90015

Re: Draft PEIR – City of Los Angeles Commercial and Multifamily  
Franchise Hauling - SCH #2013021052

Dear Mr. Meyers:

On behalf of the Motion Picture Association of America, Inc. and our member companies\*, I am writing in response to the draft PEIR for the City's commercial and multifamily franchise hauling program. We are seeking clarification on the treatment of both on-location motion picture production and studio facility operations, both of which were specifically addressed in the Bureau of Sanitation's Final Implementation Plan, but are not mentioned in the draft PEIR.

The Bureau's April 24, 2013 memo accompanying the Final Implementation Plan states in part, "on-location filming is not included in the franchise system, because on-location operations are similar to construction and demolition sites, temporary and not associated with commercial premises." The draft PEIR does not mention on-location waste as being excluded from

7-1

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\* The Motion Picture Association of America, Inc. includes: The Walt Disney Studios Motion Pictures; Paramount Pictures Corporation; Sony Pictures Entertainment Inc.; Twentieth Century Fox Film Corporation; Universal Studios LLC; and Warner Bros. Entertainment Inc.

the franchise system, and we ask the Bureau to reconfirm that such waste is indeed exempt.

7-1  
(cont'd)

In addition, the Final Implementation Plan, adopted by the City Council on April 24, 2013, sets forth an alternative program for studio facilities in the City, with four recommendations for its implementation (page 3-29):

- *Require major studios to employ a franchise hauler—one awarded one of the City service zones.*
- *Require that major studios be subject to the same collection system requirements as under the franchise system, including diversion standards, accurate reporting, AB939 Fees, Franchise Fees, and the employment of clean fuel vehicle fleets.*
- *Periodically, each studio will be subject to an independent third-party audit, at their own expense, of their satisfaction of the environmental and other requirements imposed by the general franchise system. The Bureau will report periodically on the results of the audit, and the City will retain the discretion to bring a studio under the general franchise system in the zone in which they are located, where the studio fails to achieve the environmental benefits achieved in the zone in which they are located.*
- *City staff will further define which studios will be covered by this alternative program, during the RFP development process, in consultation with the industry and through the ongoing stakeholder process.*

7-2

The draft PEIR does not discuss this program, and we ask that the Bureau correct the PEIR so that it adequately addresses the environmental impacts of the approved alternative program for studio facilities, for purposes of CEQA compliance.

Please do not hesitate to contact me at (818) 935-5838 if you have any questions or would like to discuss further.

Sincerely,



## LETTER 7

### **Motion Picture Association of America, Inc.**

Specific responses to comments from the Motion Picture Association of America, Inc. comment letter, dated January 8, 2014, are provided below.

#### **Response to Comment 7-1**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how studios unique needs are met in the Proposed Project. However, the City offers the following for clarity to the commenter:

The Proposed Project includes the recommendation for studios, as detailed in Section 3.7.4 of the FIP. Under the Proposed Project, each studio will be required to select one of the haulers awarded a franchise by the City; however, the selected franchise hauler does not necessarily need to be the hauler selected for the franchise zone in which the studio is located. The franchise hauler selected by a studio shall be required to meet the waste diversion, accurate reporting, payment of fees, and clean air vehicles, along with all other requirements of the City's franchise agreement.

As approved by the City Council on April 24, 2013, Council File (CF) Number 10-1797-S15 (see Attachment 7-1A), Solid Resources generated by on-location filming is excluded from the Proposed Project as on-location filming is not defined as a commercial establishment.

#### **Response to Comment 7-2**

The volume of Solid Resources generated and collected within the City under the current open permit system for waste collection includes the Studios. As discussed in Section 3.1.4 Transportation and Traffic of the Draft Program EIR, the traffic analysis includes the current vehicle miles traveled (VMT) for the collection, processing and disposal of residual Solid Resources, which includes the volumes generated by the Studios under the current open permit system for waste collection. The transportation and traffic analysis for the Draft Program EIR includes a projection of future VMT under the proposed franchise collection system, which also includes the Studios.

The VMT analysis for the current open permit system for waste collection and the proposed franchise collection system is the basis for the analysis of truck trips, air emission, greenhouse gas (GHGs) emissions and public health from air emissions related to the trucks trips for the collection and transport of Solid Resources under the Proposed Project. As the volume of Solid Resources generated and collected from the Studios is included in these analyses and included in the impact findings of the Draft Program EIR, the impacts associated with the collection and transport of Solid Resources generated by the Studios under the franchise collection system are adequately addressed in the Draft Program EIR. Therefore, no additional analysis is required to respond to the comments from the Motion Picture Association of America.

January 9, 2014

Via E-Mail and Regular Mail

[Daniel.meyers@lacity.org](mailto:Daniel.meyers@lacity.org)

**RE: COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (DRAFT PEIR) CITY OF LOS ANGELES COMMERCIAL AND MULTIFAMILY FRANCHISE HAULING.**

Dear Mr. Meyers and City Staff:

Thank you for the opportunity to comment on the referenced Draft PEIR for the proposed City of Los Angeles Commercial and Multifamily Franchise Hauling Project

The Los Angeles County Disposal Association (LACDA or Association) represents solid waste recyclers/haulers, facility owners/operators, and industry associated firms throughout Southern California. We have been an active participant in your franchise process from the very beginning. Our members are strong supporters of the City's environmental and waste diversion goals.<sup>1</sup> The Association and its members will continue to be important stakeholders, all the way through the franchise award process. Our members are a key resource and partners for the City of Los Angeles, and we support a franchise that takes into account the issues raised in this letter.

**Attached** with this letter, and incorporated in their entirety by this reference, are an economic analysis study by AECOM dated January, 2012, additional analysis by consultant Maxcom Data Management dated February, 2012 that has extensive experience throughout the State on these issues, and the November 9, 2012 City Administrative Officer Report on the franchise issue.

- 1. Competition Is Important To Service and Rates, And The Association Is Very Concerned That The Proposed 11 Zone Exclusive Franchises – With Up To 49% Market Share For A Single Hauler – Will Have Anti-Competitive Effects On Rates and Service.**

8-1

As an Association, we support fair competition in all aspects of the solid waste industry. This

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<sup>1</sup> Solid waste industry truck fleets already are the cleanest in the nation. The industry should be commended for its huge investment over the past 5-10 years in clean technology. No matter what the City of Los Angeles does, South Coast AQMD Rule 1193 requires total phase-in to LNG/CNG by 2020. Already, all fleets are heavily regulated by the special California Air Resources Board Solid Waste Collection Vehicle Rule (13 Cal. Code Regs. § 2020) and rules that require PM retrofits, annual opacity and smoke testing (13 Cal. Code Regs. § 2485). Solid waste trucks have special fleet rules and cannot be compared, for example, to the unregulated Los Angeles Ports truck fleets of the past.



includes achieving competitive rates and high service levels for City residents and businesses. Industry/company achieved efficiencies such as cleaner and more efficient trucks and equipment, and expanding facilities featuring new technologies and equipment, have allowed the industry to keep rates low while expanding recycling services. The best service for the lowest rate is the standard set in our competitive environment. This benefits us all.

It is critical that the City of Los Angeles maintain strong competition to ensure affordable hauling services for both property owners and residents. In fact, Los Angeles Municipal Code §§ 66.08.4 and 66.32 recognize the benefits of competition, indicating that all franchises “shall be non-exclusive” and that “among the various purposes of this program is the goal of maintaining an open and competitive market for all companies providing solid waste and disposal services in the City.”

We therefore are concerned that the proposed 11 zone exclusive franchise project may lead to higher collection costs for City businesses (estimated increase of two-to-three times current competitive rates over five years). Please review the AECOM and Maxcom analyses we provide in detail, and the findings therein are supported by substantial evidence.

We are also very concerned that the 49% market share threshold in the proposed project for a single hauler will greatly hamper competition. In truth, there is virtually no analysis or detail provided in the PEIR on rates/cost of service in an exclusive franchise model, or how a near monopoly of 49% market share may affect consumers, housing costs, etc. (PEIR pp. ES-4, 3-195.) This market share threshold is far too high. We suggest that it be decreased to 36%. Market share under the current open competition system does not rise above 36%. LACDA believes franchise awards above the current market share percentages will have a severe debilitating effect on competition, and could create monopoly-type (think utilities) conditions which over time could actually decrease the City’s ability to manage the franchise program and inhibit future changes necessary to reach our “zero waste” goals. We see no benefit to increasing market share to nearly 50%, whereby only the largest companies that own or operate landfills could participate – does the City want to encourage landfilling? No matter what conditions are placed on recycling, giving these companies an exclusive franchise guarantees a waste stream for their landfills.

There is also a serious concern about the proposed exclusive franchise’s severe economic impacts on current hauling companies including our members that would result in threatening the viability of as many as 30-40 companies, and the resulting loss of hundreds of jobs. The AECOM, Maxcom and CAO analyses we attach review this issue in detail.

## **2. Experience Should Matter When Awarding Franchises.**

The Association includes many recyclers/waste haulers, from larger corporate companies to smaller, family-owned and operated companies. Its member companies represent some of the best in the world at this business. Many are longstanding recyclers/waste haulers in the City of Los Angeles. Many of the existing haulers and recyclers have been providing excellent service to Angelenos for generations. They know the City, its neighborhoods and its businesses.

8-1  
(cont'd)

8-2

This should matter, and additional points or consideration should be given in any franchise process to companies that have a legacy of experience in the City. The City has the authority under Pub. Res. Code § 49201, Los Angeles City Charter § 390 and Los Angeles Municipal Code § 13.18C to define who is a qualified and responsible bidder. Experience is a key component of the equation. It is important to compare similar types of service, not every City is like the City of Los Angeles, and in fact only one City is like yours.

8-2  
(cont'd)

### **3. The Project Should Include More Franchise Zones.**

The Association previously has proposed a project with 18 zones, instead of the 11 proposed zones. Our zone map proposal is attached. We are concerned that the PEIR discards such a 15-20 zone alternative with little, if any, data or meaningful analysis. (PEIR pp. 2-12, 4-20.) Our 18 zone proposal was created utilizing the City designated boundaries as outlined in the Implementation Plan, and utilizing major geographical features such as major highways, which we believe make the best boundaries and create better and safer traffic patterns. We request that this proposal be studied as an alternative in the PEIR. A project with 18 zones will help ensure a competitive market and stabilized rates for all levels of service. We also believe that by adding seven zones, the franchise areas become much more “manageable” and the transition from the current system to an exclusive franchise system will become much more efficient and could be completed in less time.

8-3

An alternative project with more zones and franchisees will have beneficial impacts on competition, leading to concomitant positive effects on rates and service. We also believe that three of the 11 zones set aside for medium to small sized companies is not enough to achieve the stated goals of preserving competition, and providing opportunity for qualified small waste collectors/recyclers. The AECOM, Maxcom and CAO analyses we provide you review this issue in detail. Also, an alternative project with more zones of smaller size would result in a lower traffic impact and be an “environmentally superior alternative.” Smaller zones could result in the centroids of more zones being closer to the truck yards of the haulers selected to service those zones, thereby reducing the off-route travel distances and associated air impacts.

In this circumstance, our proposed 18 zone alternative should be studied in greater detail in the PEIR. See *Habitat & Watershed Caretakers v. City of Santa Cruz* 213 Cal.App.4<sup>th</sup> 1277 (2013) (EIR inadequate because failed to discuss any feasible alternative, such as a limited-water alternative, that could avoid or lessen the significant environmental impact of the project on the city’s water supply); *Watsonville Pilots Ass’n v. Watsonville* 183 Cal.App.4<sup>th</sup> 1059 (2010) (more analysis of alternatives required); *Village Laguna v. Board of Supervisors* 134 Cal.App.3d 1022 (1982) (EIR properly analyzed different numerical configurations as project alternatives). Also, any alternative analysis, or decision to forgo analysis of an alternative, must be of sufficient, meaningful factual and analytical detail to allow informed decision making. See *Laurel Heights v. Regents* 47 Cal.3d 376 (1988); *San Joaquin Raptor v. County of Stanislaus* 27 Cal.App.4<sup>th</sup> 713 (1994).

#### **4. Pay-To-Play Should Not Be Tolerated And The City Should Not Base Franchise Awards On The Size Of Up-Front Payments.**

The Association is concerned that the integrity and legality of the franchise award process would be gravely damaged if franchises are awarded based on large up-front payments. Such large up-front payments likely would benefit only the largest companies, to the detriment of smaller, independent haulers. Also, the money for the up-front payment must come from somewhere, and that “somewhere” is the consumer. Such large up-front payments, in our experience, are recouped from higher rates during the course of the franchise. That is not the direction the City should take here.

Thus, a franchise award based on large up-front payments would violate Los Angeles Municipal Code § 13.29 that provides that “[n]o clause or condition of any kind shall be inserted in any advertisement of any franchise, permit or privilege offered for sale under the terms of this chapter which shall directly or indirectly restrict free and open competition in bidding therefor.” Moreover, the recent case of *Eel River Disposal & Resource Recovery, Inc. v. County of Humboldt* 221 CalApp.4<sup>th</sup> 209 (2013) makes clear that when it comes to waste franchises, the City is obligated to choose the lowest responsible bidder, not the bidder with the highest up-front payment. In *Eel River*, the County’s award of exclusive franchise to collect and dispose of solid waste was improper, as the manner in which franchise was awarded deviated from strict compliance with bidding requirements of Pub. Res. Code § 49201(c), and gave the successful bidder an unfair advantage over other bidders. This rule serves the purposes of insuring economy and eliminating fraud and corruption in a competitive bidding process. Finally, there is no provision in the Los Angeles Charter or Municipal Code that specifically provides for the awarding of a franchise based on which bidder has the largest up-front payment.

8-4

#### **5. The PEIR Should Acknowledge The Need For Additional Environmental Review Of Franchise Awards.**

A PEIR is used under the California Environmental Quality Act (CEQA) for overall programs and allows narrowing environmental review for subsequent tiered projects. Instructive cases on the PEIR principle are *Sierra Nev. Conserv. v. County of El Dorado* 202 Cal.App.4<sup>th</sup> 1156 (2012) and *San Diego Citizenry v. County of San Diego* 219 CalApp.4<sup>th</sup> 1 (2013).

We appreciate that the PEIR admits that there will need to be site specific analysis for all new facilities. It admits repeatedly that location and analysis of new facilities is unknown and will be required in future CEQA documents. (PEIR pp. ES-2, 3-20, 3-53, 3-55, 3-70, 3-71, 3-167, 3-183.)

8-5

However, we request that the PEIR also acknowledge that a future CEQA document will be required with regard to collection, once franchises are awarded. In fact, Los Angeles Municipal Code § 13.25.1B anticipates that CEQA review will be needed to analyze franchise awards. Only then will sufficient information be available to fully disclose the environmental impacts, particularly on traffic patterns and destination of waste. This will be required to show that the modeling assumptions in the PEIR are correct. For example, the PEIR admits at pp. 3-69, 3-71 with regard to waste destination that “individual effects cannot be identified with certainty.” No

attempt is made in the PEIR to model such off-route travel to consider what haulers would serve each zone, or how the association of certain haulers with certain zones would affect VMT and traffic patterns.

In fact, new, increased, localized impacts may occur in 2017 at existing facilities/locations, depending on what hauler gets which franchise, especially if up to 49% market share is permitted. These localized impacts, therefore, will not be caused only by new facilities. They may be caused by collection – bringing waste to existing facilities. This may have traffic impacts, land use impacts, noise, cumulative and other impacts. For example, assumptions about no cumulative impacts to air quality from collection, (PEIR p. ES-48), are speculative since there is no real data about waste collection destination, ie, what facilities will this waste go to. Moreover, PEIR Appendix E (Table A-11) admits that depending on which facility the waste goes to, the traffic impacts (VMT, traffic patterns) will surely be different.

8-5  
(cont'd)

As a result, the PEIR should acknowledge that there will be need for some level of additional CEQA review for future discretionary franchise awards. Under Public Resources Code § 21166 and Guidelines § 15168(c), if changes in the later project or new information show any new significant environmental effects or increase the severity of environmental effects identified in the Program EIR, the agency must prepare an additional CEQA document such as a Supplemental EIR. “An EIR is required for a site specific project within the larger program if the project may cause significant effects.” *American Canyon Community v. City of American Canyon* 145 Cal.App.4<sup>th</sup> 1062, 1073 (2006); *see also Concerned Citizens of Costa Mesa, Inc. v. 32<sup>nd</sup> District Agricultural Association* 42 Cal.3d 929, 934 (1986) (agency violated CEQA when it failed to prepare a SEIR for significant project changes and new information); *Mani Brothers v. City of Los Angeles* 153 Cal.App.4<sup>th</sup> 1385, 1405 (2007) (reversing agency and holding that original EIR failed to adequately analyze public safety impacts, even where building footprint unchanged and 390 page addendum prepared); *Mira Monte Homeowners Assoc. v. County of Ventura* 165 Cal.App.3d 357, 363-4 (1985) (“failure to prepare a subsequent or supplemental EIR deprived the public, who relied upon the EIR’s representations of meaningful public participation”). This will certainly require, for example, a traffic study (and CEQA review thereof) once franchises are proposed to be awarded.

LACDA and the waste industry look forward to working with the Bureau of Sanitation and the Board of Public Works on the Franchise PEIR. We are, and will remain, an important stakeholder, and incorporate by this reference all written and oral comments submitted on the matter by any commenting party or agency. *Citizens for a Better Environment v. City of Richmond* 184 Cal.App.4<sup>th</sup> 70, 86 (2010) (EIR invalidated based on comments and expert reports submitted after Final EIR completed); *Bakersfield Citizens for Local Control v. City of Bakersfield* 124 Cal.App.4<sup>th</sup> 1184, 1200-1201, 1208 (2004) (court found agency did not meaningfully consider expert reports submitted at final hearing on project); *Galante Vineyards v. Monterey Water Dist.* 60 Cal.App.4<sup>th</sup> 1109, 1120 (1997) (CEQA litigation not limited only to claims made during EIR comment period).

8-6

Finally, the undersigned is requesting all notices of CEQA actions and any approvals, Project CEQA exemptions under Pub Res. Code § 21152 or determinations, or public hearings to be held on the Project under any provision of Title 7 of the California Government Code (California



Planning and Zoning Law), as well as the City of Los Angeles Municipal Code. This request is filed pursuant to Pub. Res. Code §§ 21092.2 and 21167(f), and Government Code § 65092, which require local agencies to mail such notices to any person who has filed a written request for them.

8-6  
(cont'd)

The Association and its members will continue to be important stakeholders, all the way through the franchise award process. Please feel free to contact myself or our members at any time if they or I can be of assistance.

Sincerely,

Ron Saldana  
Executive Director, L.A. County Disposal Association

Attachments.

## LETTER 8

### Los Angeles County Disposal Association

Specific responses to comments from the Los Angeles County Disposal Association comment letter, dated January 9, 2014, are provided below.

#### Response to Comment 8-1

This comment does not raise an environmental issue. The comment addresses the program implementation issues potentially higher rates and the effect waste hauler market share competition. However, the City offers the following for clarity to the commenter:

The City acknowledges competition in the waste hauling and management sector is critical in ensuring collection fee rates are fair and equitable, and that high levels of service are provided to City residents and commercial establishments. While it may at first glance appear the establishment of 11 Franchise Zones under the Proposed Project could lead to higher rates, the City would utilize a competitive request-for-proposal (RFP) process whereby commercial waste haulers and processors would develop proposals to address the needs of the Franchise Zones for which they are submitting proposals. This will result in commercial waste haulers and processors competing with other proposers for a franchise.

Regarding the reference that the existing Municipal Code sections noted in this comment, the establishment of 11 franchise zones in conjunction with a limitation on the market share a hauler can control will ensure no hauler would be able to exclusively provide services to the multi-family residential and commercial establishments throughout the City.

Regarding the concern that a 49 percent market share threshold could “stifle” competition, and a lower threshold should be established, the concern is noted and is included herein for consideration by the City Council. The City expects the RFP process to be extremely competitive and facilitate both low cost and high levels of service.

Regarding the comment that the Franchise program could have economic impacts on various haulers and associated jobs, the City intends to meet its diversion requirements by utilizing the capabilities and expertise of the waste hauling and processing industry. It is anticipated that additional jobs will be created as result of the Proposed Project. Diversion of solid waste creates additional jobs as compared to landfilling. As diversion increases in the Proposed Project so will the jobs necessary to collect and process that material.

#### Response to Comment 8-2

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how experience should matter in awarding franchise contracts. However, the City offers the following for clarity to the commenter:

The City recognizes that the Commenter's member companies may represent some of the best in the world in the solid waste management business. The City anticipates that the RFP process will include experience as an element it considers in evaluating proposals.

#### Response to Comment 8-3

Regarding the request that the Program EIR evaluates an alternative with 18 smaller franchise zones, the Draft Program EIR evaluated an alternative with 15-20 franchise zones in Section 2.5.4.1, but withdrew it from further consideration because it was not expected to result in fewer impacts or substantively different environmental impacts than the Proposed Project. Under CEQA, EIRs are required to evaluate a reasonable range of alternatives that would substantially achieve most of the project's basic objectives but would avoid or

substantially reduce any of the significant environmental impacts of the project and evaluate the comparative merits of the alternatives (Calif. Public Resources Code, Division 13: Section 15126.6(a)). Further the result of the analysis performed in this Draft EIR found that there were no significant impacts to traffic or air emissions of the Proposed Project related to the collection activities and the 11 zones.

Regarding alternatives to the Proposed Project, Section 4.0 of the Draft Program EIR includes a specific analysis that compares the environmental impacts of various alternatives collection system. The Draft EIR includes two other alternatives that increase the number of franchise haulers (compared to the 18-zone alternative proposed by the commenter).

Regarding the comment that three zones being set aside for medium to small sized companies is not enough to achieve the stated goals of preserving competition and providing an opportunity for qualified small waste collectors and recyclers, this comment does not raise an environmental question. The commenter's economic concerns are noted and will be forwarded to the City Council for their consideration. Regarding the comment that a greater number of smaller zones could result in an improvement in vehicle miles traveled (VMTs) because the zones would be closer to the truck yards, there is no need to evaluate this alternative further. The statement that more collection zones would result in truck yards closer to the zones has no merit. The selection of a franchise hauler will occur through a competitive process that will take many factors into consideration. The RFP process will not guarantee the proximity to any zone, large or small. Further, the result of the analysis performed in this Draft EIR found that there were no significant impacts to traffic or air emissions of the Proposed Project related to the collection activities and the eleven zones. Comparing the VMTs from Alternative 1, Non Exclusive Franchise System, to those of the Proposed Project, the Draft EIR found that although Alternative 1 results in an increase in VMTs as compared to the Proposed Project, the collection activities under Alternative 1 would still not result in significant impacts. Considering this, and as discussed in Section 2.5.4.1 of the Draft Program EIR, a franchise system with 15-20 zones was eliminated from further consideration as that alternative was not expected to result in fewer impacts or substantively different impacts than the Proposed Project.

#### Response to Comment 8-4

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how franchise fees will be determined. Regarding the comment on upfront payments, the comment is acknowledged and is included herein for consideration by the City Council.

#### Response to Comment 8-5

Regarding the request that the Draft Program EIR acknowledge that future CEQA documents will be required with regard to collection once franchises are awarded, the request is acknowledged. The Draft Program EIR specifically acknowledges that future CEQA documentation would be required if and when future facilities are proposed because there are no specific details on the characteristics or locations of such facilities. In contrast to the lack of details concerning future new facilities, the estimates of VMT and vehicle hours traveled (VHT) by collection vehicles under the Proposed Project and Project Alternatives were based on the transport of Solid Resources from customer locations throughout the City to material processing facilities. This assessment is based on Sanitation's Traffic Analysis Technical Memorandum prepared by CH2M HILL in August 2013, which was provided as a technical memorandum in Appendix E of the Draft Program EIR. Because project information for the collection activities under the Proposed Project and Project Alternatives were evaluated on real data, the impacts described in the Draft Program EIR reflect the likely impacts of the collection activities under either the Proposed Project or the Project Alternatives. As a consequence, the City does not anticipate a need to further evaluate the proposed collection activities of an awarded franchisee unless the activities clearly deviate from those described in the Draft Program EIR.

Regarding the comment that the Proposed Project could have a significant impact on existing facilities, the City does not believe this to be the case because any existing processing facility would have a permitted daily capacity, and trips to and from these existing facilities could not be in excess of the existing capacity.

Further, any facility in California would have undergone a project-level CEQA analysis based on the permitted capacity of that facility. This being the case, neither the Proposed Project nor a Project Alternative could result in new impacts to existing facilities that were not previously evaluated in an appropriate CEQA document. Because of this, the City does not anticipate the need to conduct further CEQA review of the collection activities of awarded franchisees unless the activities clearly deviate from those described in the Draft Program EIR.

**Response to Comment 8-6**

The City would like to thank the Association and its members for its valuable solid waste collection and management services, and the City also looks forward to reviewing any proposals put forth by the commenter's members, should City Council decide to move forward with a franchised waste collection program to help meet the City's diversion goals. The City acknowledges the request for further CEQA notifications, and again thank you for your comments.



Comment letter #9

Daniel Meyers, Senior Civil Engineer  
Solid Resources Recycling Division, Bureau of Sanitation  
1149 South Broadway, 5th Floor, Mail Stop 944  
Los Angeles, CA 90015

**SUBJECT: Draft Program Environmental Impact Report (Draft PEIR) Los Angeles Commercial and Multifamily Franchise Hauling (ZERO WASTE LA) – Public Comments**

Mr. Meyers,

The Valley Industry and Commerce Association (VICA) would like to thank you for all of the work you have done and continue to do for the Bureau of Sanitation and the city of Los Angeles as a whole.

We have carefully reviewed the draft PEIR and to ensure that this proposal is carried out in the most impactful manner, VICA has outlined foreseeable concerns regarding the plan and impacted industries across the city. We feel that if these concerns are addressed, the project has the potential to be carried out efficiently and effectively.

- 1. Alternative for Source Separating –** The PEIR analyzed a program based on the blue bin system (source sorting only). Alternatives were considered, but rejected based on the assumption that the city would not be able to achieve a 90 percent diversion rate due to the higher incident of “contaminated waste,” although it may have met the other four goals and objectives. We feel that other hybrid approaches should be considered including allowing for commingling of waste to be separated at a “dirty” MRF and a blend of multi-stream, single-stream and mixed-waste stream collection as a feasible alternative. Source sorting has proved troublesome in multifamily residential in other cities, as landlords cannot always ensure compliance by tenants and do not always have the option of passing down fees and citations to tenants. This can also create a problem for commercial entities that have onsite physical constraints and other challenges that impede them from separating on-site. Per the “Final Implementation Plan for Exclusive Commercial and Multifamily Franchise Hauling System,” the department allows haulers to offer other types of diversion programs. 9-1
- 2. Fees for Services Not Utilized –** To ensure that our companies are not precluded from going above minimum waste diversion requirements, we must ensure that haulers do not force commercial entities to pay for services they do not utilize. For example, if a company collects and manages its own recyclables (by selling, backhauling, etc...) we wouldn't want a waste hauler to still be able to charge them for collection of recyclables. We have seen this happen in several jurisdictions and it only undermines efforts by companies and in many cases stops them from going beyond what is technically required of them. Of course, companies often go to such great lengths for diversion because they have a financial interest in doing so. When the municipality allows (or worse, requires) a waste hauler to charge for services not provided it 9-2

undermines the financial benefits and companies may actually downgrade their efforts in terms of waste diversion.

9-2  
(cont'd)

3. **Land Use and Planning, L.U. - 2** – The Land Use and Planning section of the PEIR states that in order to minimize nuisance issues, future facilities may implement operational characteristics such as “limiting hours of operation or placing restrictions on specific types of uses or activities proposed for the facility” in order to have a less than significant impact. This may be problematic since some key Los Angeles industries and companies have unique needs that must occur outside normal business hours.
4. **Reporting Logs** – Certain industries are subject to audits and checks from state and federal entities who are responsible, in part for their funding. As such, certain federal departments could ask for reporting logs at any time, to view when hazardous or dangerous material was taken off the premises and by whom. Currently, businesses can require accuracy in reporting logs as part of their contract with an independent hauler. We must ensure that under the franchise system, haulers will still be able to provide accurate information for these reports to ensure that safety and health guidelines are being met without compromising funding for any of our vital industries.
5. **Background checks** – Similarly to reporting logs, certain business facilities in the city require background checks of any person who enters on to their premises, or once that person has reached a specific protected area. Under the current system, these companies can discuss with their private hauler the best way to go about obtaining background checks for those from the waste company who need it to come service the building. Under the new franchise system, the city should ensure that unique and specific, yet crucial needs like this are met by new franchised haulers.
6. **Rates Reviewed on an Annual Basis** – Under the proposed project, the city would establish a formula and caps on how rates charged for collection could be increased annually. This time frame could prove to be very disruptive to businesses, as they prepare budgets for the future year long in advance. In addition, the plan specifies that the city has the right to charge different rates in the different zones. This would make it more expensive to run a business in one zone instead of another and could potentially lead to relocation of businesses from expensive zones to less expensive zones, leaving the expensive zones with less industry and economic development. Furthermore, the PEIR did not evaluate the possible economic impacts these variables may have on tenants, property owners, or businesses.

9-3

9-4

9-5

9-6

Should these concerns be addressed and considered throughout the entire development of the program, we believe this plan could meet the needs of the city's residents and businesses. Thank you for your efforts on Zero Waste LA and we look forward to working with you moving forward.

Sincerely,



Coby King  
Chair



Stuart Waldman  
President

**LETTER 9****Valley Industry & Commerce Association**

Specific responses to comments from the Valley Industry & Commerce Association comment letter, (no date included on the letter), are provided below.

**Response to Comment 9-1**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how recycling programs are implemented. However, the City offers the following for clarity to the commenter:

It appears the commenter is under the belief that the Proposed Project seeks to meet the waste diversion goals strictly through source separation by the customer through a three bin system, and if so, this is not an accurate understanding of the Proposed Project. As noted in Section 3.6.1 of the Franchise Implementation Plan (FIP), Appendix B, source separation (Blue Bin recycling) is the minimum level of recycling under the Proposed Project. Section 3.6.2 of the FIP details the requirements for diversion of organic waste through a Green Bin collection program. As noted in Section 3.6.4 of the FIP, franchised waste haulers will be encouraged to exceed minimum diversion target by including innovative programs. The Proposed Project anticipates and will allow other types of innovative diversion programs in addition to source separation, which may include further processing of Black Bin material, to assist haulers in achieving the higher goals of Zero Waste. It should be noted that mixed waste processing of Black Bin material is not the only diversion option that Franchise haulers can employ.

**Response to Comment 9-2**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how rates are established. However, the City offers the following for clarity to the commenter:

Although the comment does not raise an environmental issue, it is acknowledged and is included herein for consideration by the City Council..

**Response to Comment 9-3**

The comment is acknowledged. The City is aware that some future processing facilities may have operational characteristics that require operations outside of normal business hours. The Draft Program EIR established mitigation measure LU-2 (which includes the language referenced in the comment) for future facilities in the event that the facilities are sited in an area that may have nearby or adjacent sensitive uses or receptors. The Draft Program EIR also notes that future facilities would be subject to further site specific environmental documentation once the specific facility features and site location are identified.

**Response to Comment 9-4**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of reporting. However, the City offers the following for clarity to the commenter:

Although the comment does not raise an environmental issue, it is acknowledged and will be considered by City Council. As a note, the City does not intend to establish conditions under a franchise program that could jeopardize the reporting requirements of certain industries.

**Response to Comment 9-5**

Although the comment does not raise an environmental issue, it is acknowledged and will be considered by City Council. As a note, the City does not intend to establish conditions under a franchise program that could interfere with customer requirements (of franchised haulers) to comply with applicable background checks or other security-related verifications.

**Response to Comment 9-6**

Although the comment does not raise an environmental issue, it is acknowledged and is included herein for consideration by the City Council.. As a note, CEQA does not require the evaluation of economic impacts. The City does not intend for a franchise program to be disruptive of the future business planning efforts of haulers; however, a goal of the Program is to create a consistent, clearly defined system with fair and equitable rates and contingency plans to ensure reliable service. The City envisions implementing a rate review mechanism under a franchise program.





Daniel Meyers, Senior Civil Engineer  
Solid Resources Citywide Recycling Division, Bureau of Sanitation  
1149 South Broadway, 5th Floor, Mail Stop 944  
Los Angeles, CA 90015

January 10, 2013

**RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR CITY ORDINANCE: CITY-WIDE  
EXCLUSIVE FRANCHISE SYSTEM for MUNICIPAL SOLID WASTE COLLECTION AND HANDLING**

Dear Mr. Meyers:

The Don't Waste LA Coalition strongly supports the City's transition to the Exclusive Franchise Waste and Recycling System for commercial properties and apartment buildings (Zero Waste LA system). The recently released Draft Program Environmental Impact Report (DEIR) fortifies support for this clearly superior model to advance LA's environmental objectives. Specifically, the DEIR clearly demonstrates that the Proposed Project, the Zero Waste LA system, is the best alternative. The DEIR supports the Don't Waste LA Coalition's contention that this system is the best way to meet the City's environmental and zero waste goals. The Zero Waste LA system is not only the best option for the environment, but will also ensure better quality jobs, improve customer service, and stabilize rates.

Los Angeles will begin to reap the environmental benefits of the Zero Waste LA franchise system as soon as it is implemented, thanks to clean truck fleets and efficient routes. By 2030, the Proposed Project would reduce greenhouse gas emissions and vehicle miles travelled (VMT), because of cleaner trucks and routing efficiencies. Demonstrated with substantial evidence throughout the DEIR, the Proposed Project would also result in a substantial reduction of harmful air toxics, such as nitrous oxides, sulfur oxides, and volatile organic compounds compared to the other alternatives. We are also pleased to see the DEIR's thorough analysis that conclusively rejects mixed waste processing, or "dirty MRFs", as failing to meet the city's goals while increasing negative impacts.

The CEQA analysis confirms that the City is heading in the right direction to fix the substantial issues with its waste collection system for apartment buildings and commercial properties. We look forward to reviewing the Final Program EIR, and thank you for the additional time to review the DEIR, ensuring all stakeholders are afforded time to review this important information. We urge the City to proceed with finalizing the EIR as expeditiously as possible so we can begin to achieve the environmental benefits of this new, more sustainable waste hauling system.

Sincerely,

The Don't Waste LA Coalition



Sierra Club Angeles Chapter Zero Waste Committee

Hillary Gordon, Chair,

Natural Resources Defense Fund (NRDC)

David Pettit, Senior Staff Attorney

Teamsters Local 396

Ron Herrera, Secretary-Treasure

Los Angeles Alliance For a New Economy (LAANE)

Roxana Tynan, Executives Director

Earth Justice

Adrian Martinez, Staff Attorney

Alliance for Climate Education (ACE)

Kristina von Hoffmann, Associate Program Director, West Coast Region

Isidore Electronics Recycling

Kabira Stokes, Founder & Chief Executive Officer

Sustain LA

Leslie Van Keuren Campbell, Founder



Pacoima Beautiful

Veronica Padilla, Executive Director

Communities for a Better Environment

Bahram Fazeli , Policy Director

Zero Waste Business Council

Stephanie Barger, Executive Director

## **LETTER 10**

### **Don't Waste LA**

The comment letter from Don't Waste LA Coalition, dated January 10, 2014, expresses support for the Project.



# APARTMENT ASSOCIATION GREATER LOS ANGELES

621 So. Westmoreland Ave. • Los Angeles, California 90005-3981

Central (213) 384-4131  
Fax (213) 382-3970  
Westside (310) 277-1370  
South Bay (310) 536-0281  
San Fernando Valley (818) 780-5611  
San Gabriel Valley (626) 570-0781  
Website: www.aagla.org  
E-MAIL: aagla@aol.com

January 9, 2013

Daniel K. Meyers, Assistant Division Manager  
Solid Resources Citywide Recycling Division  
City of Los Angeles Department of Public Works  
Bureau of Sanitation  
1149 S. Broadway, 5th Floor  
Los Angeles, CA 90015

**RE: Submission of Comments on the Draft Program Environmental  
Impact Report for City Ordinance: City-Wide Exclusive Franchise  
System for Municipal Solid Waste Collection**

Dear Mr. Meyers:

On behalf of the Apartment Association of Greater Los Angeles ("AAGLA"), Los Angeles' Voice of Multifamily Housing since 1917, we appreciate the opportunity to submit comments on the Draft Program Environmental Impact Report for the city Exclusive Franchise System for Municipal Solid Waste Collection. These comments are intended to be both positive and constructive, as AAGLA is committed to working with the City of Los Angeles to help it reach its Zero Waste Goals.

One of the stated goals of the Exclusive Franchise, as set forth in the EIR is to "Meet the City's Zero Waste Goals by establishing the maximum disposal for each zone, and implementing waste diversion programs that are consistent Solid Waste Integrated Resources Plan goals."

The City's SWIRP plan requires 90% landfill diversion by 2020; the current City diversion percentage is 76%. If the City is going to achieve its 2020 goal, increased recycling at multifamily dwellings is going to be a key driver in doing so.

11-1

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2014 JAN 14 PM 3:45  
PW/BUREAU OF SANITATION  
S.R. CITYWIDE RECYCLING

←

The Exclusive Franchise mandates source separated recycling for multifamily dwellings consisting of five or more units. Unfortunately, it does not allow for mixed waste processing. This mandate is unnecessary and counter-productive in the context of multifamily housing.

History has shown clearly that source separated recycling is ineffective in a multifamily setting, and that mixed waste processing is a superior alternative. Residents of apartment buildings cannot be forced to separate waste and recycle as it would in no uncertain terms be a cause for eviction.

Another reason source separated recycling does not work well in older multifamily buildings is due to a lack of space to store the multiple bins that source separation requires. Simply put, space is tight and many apartment buildings have nowhere to put the blue, black, and green bins. Likewise, newer buildings with trash chutes were not designed for source separation, leading to lower participation in recycling programs. Finally, blue bins themselves become trash containers.

If tenants were able to dispose of their trash in a single container, or down a single trash chute, as state law AB 341 allows them to do currently, these materials would be taken to a MRF, where they would be professionally sorted. We know from the City's own data that anywhere from 19%-32% of recyclables would be recovered, versus the 2.3% that are being recovered via source separated recycling under the City's multifamily recycling program.

AAGLA believes strongly that the final EIR for the Exclusive Franchise should study a simple diversion goal for haulers and/or the inclusion of mixed waste processing as alternate options for multifamily recycling. The option of mixed waste processing currently applies under AB 341, and provides a common sense solution for multifamily dwellings when the lack of adequate bin space prohibits source separated recycling.

Respectfully,



James B. Clarke  
Executive Vice President  
Apartment Association of Greater Los Angeles

11-1  
(cont'd)

**LETTER 11****Apartment Association Greater Los Angeles**

Specific responses to comments from the Apartment Association comment letter, dated January 9, 2014, are provided below.

**Response to Comment 11-1**

This comment does not raise an environmental issue. The comment addresses the program implementation issue of how recycling programs are implemented. However, the City offers the following for clarity to the commenter:

It appears the commenter is under the belief that the Proposed Project seeks to meet the waste diversion goals strictly through source separation by the customer through a three bin system, and if so, this is not an accurate understanding of the Proposed Project. As noted in Section 3.6.1 of the Franchise Implementation Plan (FIP), Appendix B, source separation (Blue Bin recycling) is the minimum level of recycling under the Proposed Project. Section 3.5.1 of the FIP also identifies a "valet" type of collection, if necessary, similar to that provided by the Private Hauler Multifamily Residential Recycling Program. Section 3.6.2 of the FIP details the requirements for diversion of organic waste through a Green Bin collection program. As noted in Section 3.6.4 of the FIP, franchised waste haulers will be encouraged to exceed minimum diversion target by including innovative programs. The Proposed Project anticipates and will allow other types of innovative diversion programs in addition to source separation, which may include further processing of Black Bin material, to assist haulers in achieving the higher goals of Zero Waste. It should be noted that mixed waste processing of Black Bin material is not the only diversion option that Franchise haulers can employ.

January 10, 2014

Mr. Daniel Meyers  
Solid Resources Citywide Recycling Division  
City of Los Angeles, Bureau of Sanitation  
1149 South Broadway, 5<sup>th</sup> Floor  
Los Angeles, CA 90015



Comment letter #12

**RE: Commercial and Multifamily Franchise Hauling**

Dear Mr. Meyers,

On behalf of the California Grocers Association, I write to comment on the Commercial and Multifamily Franchise Hauling Plans and potential impacts on the grocery industry. California's grocery industry has a long history working to reduce, recycle and properly handle waste in support of zero waste goals. Grocery companies in Los Angeles and throughout California have been at the forefront of recycling beverage containers, cardboard, plastic film and organics. We appreciate and encourage the City of Los Angeles to look for ways to either reduce or better handle waste. Our hope is that both of our efforts to achieve zero waste goals complement each other without unnecessarily impacting or burdening our current business-based efforts.

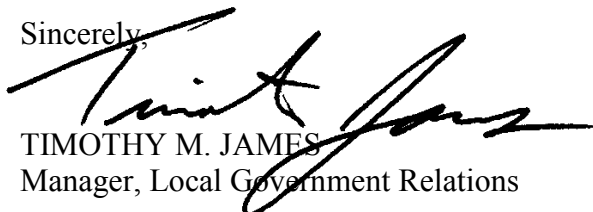
The California Grocers Association is a non-profit, statewide trade association representing the food industry since 1898. CGA represents approximately 500 retail member companies operating over 6,000 food stores in California and Nevada, and approximately 300 grocery supplier companies. Retail membership includes chain and independent supermarkets, convenience stores and mass merchandisers. CGA members include numerous grocery companies operating throughout the city of Los Angeles.

Grocery companies operating in Los Angeles have already developed and are operating programs to capture and properly handle unsellable product and recyclable materials. These efforts are already helping Los Angeles meet its zero waste goals. The acknowledgement of our current efforts by preserving existing organic waste collection, according to the Final Implementation Plan of April 2013 is appreciated. As this plan is evaluated we encourage you to recognize and preserve our ability to further zero waste goals by continuing to operate our zero waste programs unencumbered. We believe that allowing business-based zero waste programs will further zero waste efforts while reducing environmental impacts to Los Angeles.

In addition to allowing business-based zero waste programs by the grocery industry, we respectfully ask that business taking the initiative to help Los Angeles reach its zero waste goals be exempt from unnecessary or unintended impacts. As an example, if a business is performing its own zero waste and meeting or exceeding the waste diversion goal established by the city, but is located in a Zone that has not reached the threshold, we believe the city must exempt this business from any fines, penalties or mandates to abandon the existing program or adopt other hauling methods. We respectfully ask that business-based efforts to achieve zero waste must be viewed as complimentary to the proposed plan.

Thank you for the opportunity to comment on the proposed plan and we look forward to continuing our zero waste efforts in support of the City of Los Angeles zero waste goals.

Sincerely,

  
TIMOTHY M. JAMES  
Manager, Local Government Relations

12-1



## LETTER 12

### California Grocers Association

Specific responses to comments from the California Grocers Association comment letter, dated January 10, 2014, are provided below.

#### Response to Comment 12-1

Although the comment does not raise an environmental issue, it is acknowledged and is included herein for consideration by the City Council..

The City appreciates the California Grocers Association's desire to help meet future waste diversion goals. As noted in Section 3.5.1 of the FIP, the franchisee agreements will include a list of unique waste services that customers can use to build collection programs that meet their specific needs. The City does not intend to place any fines, penalties or mandates on businesses that meet diversion goals, and does indeed view business-based efforts to achieve zero waste as complimentary to meeting the City's Zero Waste goals.

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## **SECTION 4**

### **ORGANIZATIONS AND PERSONS CONSULTED**

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The organizations and agencies listed below were consulted during preparation of this Final Program EIR.

#### **City of Los Angeles**

- Department of Public Works, Bureau of Sanitation
- Department of Planning

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## **SECTION 5**

### **REPORT PREPARATION PERSONNEL**

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The following individuals contributed to the preparation of this document.

#### **5.1 CITY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS**

<b>Contributor</b>	<b>Title</b>	<b>Area of Responsibility</b>
Daniel K. Meyers	Assistant Division Manager	Project Management
Karen A. Coca	Division Manager	Contributing Author
J. Lisa Carlson	Environmental Supervisor	Contributing Author

#### **5.2 CH2M HILL ENGINEERS, INC.**

<b>Contributor</b>	<b>Title</b>	<b>Area of Responsibility</b>
Robert Mason	Project Manager	Strategic Coordination CEQA Quality Assurance / Quality Control
Dan Pitzler	Principal Economist	Traffic Analysis, Strategic Decisions and Risk Management
Cindy Salazar	Deputy Project Manager	Project Management, EIR Preparation
Lisa Valdez	Transportation Planner	EIR Preparation
Golan Kedan	Environmental Quality Specialist	Traffic and Transportation
Dawn Durand	Word Processor	Document Production

#### **5.3 SUBCONSULTANTS**

<b>Contributor</b>	<b>Title</b>	<b>Area of Responsibility</b>
Louis Utsumi	Principal EnviCraft LLC	CEQA/EIR Preparation

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## **SECTION 6**

### **MAILING/DISTRIBUTION LIST FOR FINAL PROGRAM EIR**

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#### **6.1 FINAL PROGRAM EIR MAILING/DISTRIBUTION LIST**

A notice of the availability of the Final Program EIR was emailed to the stakeholders of the franchise process, including those who submitted written comments on the Draft Program EIR.

The Final Program EIR is available at:

City of Los Angeles Department of Public Works  
Bureau of Sanitation  
1149 S. Broadway, 5<sup>th</sup> Floor  
Los Angeles, CA 90015

And online at <http://www.lacitysan.org/>

The Final Program EIR was sent to the libraries listed below.

**Central Library**

630 W. 5th Street  
Los Angeles, CA 90071

**Encino-Tarzana Library**

18231 Ventura Boulevard  
Tarzana, CA 91356

**Lincoln Heights Library**

2530 Workman Street  
Los Angeles, CA 90031

**Northridge Library**

9051 Darby Avenue  
Northridge, CA 91325

**Robert Louis Stevenson**

803 Spence Street  
Los Angeles, CA 90023

**San Pedro Regional Branch Library**

931 S. Gaffey Street  
San Pedro, CA 90731

**Van Nuys Branch Library**

6250 Sylmar Avenue  
Van Nuys, CA 91401

**West L.A. Regional Branch Library**

11360 Santa Monica Boulevard  
Los Angeles, CA 90025

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Appendix A  
State Clearinghouse  
Notice of Completion for Draft Program EIR

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CH2M HILL  
1000 Wilshire Boulevard  
Suite 2100  
Los Angeles, CA 90017

November 18, 2013

State of California  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Subject: **SCH#2013021052**, City of Los Angeles Bureau of Sanitation  
Notice of Completion of Draft Program EIR for City-Wide Exclusive Franchise  
System for Municipal Solid Waste Collection and Handling

On behalf of the City of Los Angeles, Bureau of Sanitation, CH2M HILL is pleased to provide the Draft Program EIR to the State Clearinghouse (SCH) related to the proposed ordinance for City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, in accordance with your procedures.

**Please start public review on November 21, 2013 and end on January 10, 2014 at 12:00 pm.**

Included with this letter, you will find for distribution:

- (1) Copy of City's transmittal letter to the SCH
- (1) Signed Notice of Completion to the SCH
- (15) Copies of the Executive Summary for the Draft Program EIR
- (15) CDs of the entire Draft Program EIR

Please contact the CH2M HILL project manager, Mr. Robert Mason, at 714-435-6113 or me at 805-680-5032 if you require further information.

Sincerely,  
CH2M HILL

A handwritten signature in black ink, appearing to read "Jessica Kinnahan".

Jessica Kinnahan, AICP

# NOC and Environmental Document Transmittal

**To:** State Clearinghouse  
1400 Tenth Street, Room 212  
Sacramento, CA 95814

**Date:** November 18, 2013

**From:** Daniel Meyers  
Solid Resources Citywide Recycling Division  
Bureau of Sanitation, Department of Public Works, City of Los Angeles  
1149 S. Broadway, 5<sup>th</sup> Floor, Los Angeles, CA 90015  
Phone: 213-485-3774  
Email: daniel.meyers@lacity.org

**Subject:** Notice of Completion of Draft Program EIR for City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling

**We are sending you:**

In compliance with CEQA, the City of Los Angeles is hereby transmitting the Notice of Completion (NOC), 15 copies of the Executive Summary and 15 CDs of the entire document for the project

**Remarks:** The public review period for this Draft Program EIR should **start on November 21, 2013** and **end on January 10, 2014 at 12:00 pm.**



OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

## City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling

**SCH Number:** 2013021052

**Document Type:** EIR - Draft EIR

**Project Lead Agency:** Los Angeles, City of

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### Project Description

Note: Review per lead The City of Los Angeles is proposing to adopt and implement an ordinance for the implementation of a Citywide Exclusive Franchise System for Solid Resources Collection and Handling. The proposed ordinance would replace the current open market system for commercial Solid Resources with a franchised Solid Resources collection system comprised of 11 zones, with one exclusive Franchised Hauler per zone. The proposed ordinance would also increase diversion of materials away from landfill disposal by requiring Franchised Haulers to provide recycling services to Commercial Establishments and by establishing recycling and diversion goals.

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### Contact Information

**Primary Contact:**

Dan Meyers  
City of Los Angeles Bureau of Sanitation  
213 485 3774  
1149 S. Broadway, 5th Fl. MS 944  
Los Angeles, CA 90015-2213

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### Project Location

County: Los Angeles  
City: Los Angeles, City of  
Region:  
Cross Streets: City-wide  
Latitude/Longitude:  
Parcel No: City-Wide  
Township:  
Range:  
Section:  
Base:  
Other Location Info:

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### Proximity To

Highways: Hwy 405, 5, 10, 101, 210  
Airports: LAX, Van Nuys, Burbank  
Railways: Metrolink, BNSF, UPRR, LRT Trans  
Waterways: Los Angeles River, Ballona Cr.  
Schools: various  
Land Use: All land use designations within the City of Los Angeles

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### Development Type

Other (City-Wide Ordinance)

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### Local Action

Other Action (City Ordinance)

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### Project Issues

Aesthetic/Visual, Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Drainage/Absorption, Economics/Jobs, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Septic System, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Water Supply, Wetland/Riparian, Growth Inducing, Landuse, Cumulative Effects

---

**Reviewing Agencies** (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Resources, Recycling and Recovery; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; **Native American Heritage Commission**; Public Utilities Commission

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**Date Received:** 11/19/2013   **Start of Review:** 11/19/2013   **End of Review:** 1/10/2013

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# Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH# 2013021052

**Project Title:** City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling

Lead Agency: City of Los Angeles, Bureau of Sanitation

Contact Person: Dan Meyers

Street Address: 1149 S. Broadway, 5<sup>th</sup> Floor, MS 944

Phone: (213) 485-3774

City: Los Angeles

Zip: 90015

County: Los Angeles

## Project Location:

County: Los Angeles

City/Nearest Community: Los Angeles

Cross Streets: City-wide

Zip Code

Total Acres: \_\_\_\_\_

Assessor's

Parcel No. City-wide

Section: \_\_\_\_\_

Twp. \_\_\_\_\_

Range: \_\_\_\_\_

Base: \_\_\_\_\_

Within  
2 Miles: State Hwy # I-110, I-210, I-10, I-5,  
I-405, I-105, SR-57, SR-2,

Waterways:

Los Angeles River, Ballona Creek, Compton Creek, Tujunga Creek,  
Verdugo Creek, Aliso Canyon Creek, Bull Creek

Metrolink, BNSF,  
Union Pacific, various

Airports LAX, BUR, WHP, SMO

Railways:

LRT transit lines

Schools: various

## Document Type:

CEQA:

☐ NOP

☐ Early Cons

☐ Neg Dec

☒ Draft EIR

☐ Supplement/Subsequent EIR  
(Prior SCH No.) \_\_\_\_\_

☐ Other \_\_\_\_\_

NEPA:

☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other:

☐ Joint Document

☐ Final Document

☐ Other \_\_\_\_\_

## Local Action Type:

☐ General Plan Update

☐ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☐ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☐ Site Plan

☐ Rezone

☐ Prezone

☐ Use Permit

☐ Land Division (Subdivision, etc.)

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☒ Other Ordinance

## Development Type:

☐ Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_

☐ Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_

☐ Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_

☐ Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_

☐ Educational

☐ Recreational

Employees \_\_\_\_\_

Employees \_\_\_\_\_

Employees \_\_\_\_\_

☐ Water Facilities: Type \_\_\_\_\_

☐ Transportation: Type \_\_\_\_\_

☐ Mining: Mineral \_\_\_\_\_

☐ Power: Type \_\_\_\_\_

☐ Waste Treatment: Type \_\_\_\_\_

☐ Hazardous Waste: Type \_\_\_\_\_

MGD \_\_\_\_\_

Watts \_\_\_\_\_

Watts \_\_\_\_\_

☒ Other: Ordinance for Exclusive Franchise System for  
Municipal Solid Waste Collection and Handling

## Funding (approx.):

Federal

\$ \_\_\_\_\_

State

\$ \_\_\_\_\_

Total

\$ \_\_\_\_\_

## Project Issues Discussed in Document:

☒ Aesthetic/Visual

☒ Agricultural Land

☒ Air Quality

☒ Archeological/Historical

☒ Biological Resources

☐ Coastal Zone

☒ Drainage/Absorption

☒ Economic/Jobs

☐ Fiscal

☒ Flood Plain/Flooding

☒ Forest Land/Fire Hazard

☒ Geologic/Seismic

☒ Minerals

☒ Noise

☒ Population/Housing Balance

☒ Public Services/Facilities

☒ Recreation/Parks

☒ Schools/Universities

☒ Septic Systems

☒ Sewer Capacity

☒ Soil Erosion/Compaction/Grading

☒ Solid Waste

☒ Toxic Hazardous

☒ Traffic/Circulation

☒ Vegetation

☒ Water Quality

☒ Water Supply/Groundwater

☒ Wetland/Riparian

☒ Growth Inducing

☒ Land Use

☒ Cumulative Effects

☐ Other \_\_\_\_\_

**Present Land Use/Zoning/General Plan Designation:** All land use designations within the City of Los Angeles

**Project Description:** The City of Los Angeles is proposing to adopt and implement an ordinance for the implementation of a Citywide Exclusive Franchise System for Solid Resources Collection and Handling. The proposed ordinance would replace the current open market system for commercial Solid Resources with a franchised Solid Resources collection system comprised of 11 zones, with one exclusive Franchised Hauler per zone. The proposed ordinance would also would increase diversion of materials away from landfill disposal by requiring Franchised Haulers to provide recycling services to Commercial Establishments and by establishing recycling and diversion goals.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X". If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/>	Air Resources Board	<input checked="" type="checkbox"/>	Parks & Recreation, Department of
<input type="checkbox"/>	Boating & Waterways	<input type="checkbox"/>	Pesticide Regulation, Department of
<input type="checkbox"/>	California Emergency Management Agency	<input checked="" type="checkbox"/>	Public Utilities Commission
<input type="checkbox"/>	California Highway Patrol	<input checked="" type="checkbox"/>	Regional WQCB # <u>4</u>
<input checked="" type="checkbox"/>	Caltrans District # 7	<input checked="" type="checkbox"/>	Resources Agency
<input type="checkbox"/>	Caltrans Division of Aeronautics	<input checked="" type="checkbox"/>	Resources Recycling and Recovery, Department of
<input type="checkbox"/>	Caltrans Planning	<input type="checkbox"/>	S.F. Bay Conservation & Development Comm.
<input type="checkbox"/>	Central Valley Flood Protection Board	<input type="checkbox"/>	San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/>	Coachella Valley Flood Protection Board	<input type="checkbox"/>	San Joaquin River Conservancy
<input type="checkbox"/>	Coastal Commission	<input type="checkbox"/>	Santa Monica Mtns. Conservancy
<input checked="" type="checkbox"/>	Conservation, Department of	<input type="checkbox"/>	State Lands Commission
<input type="checkbox"/>	Corrections, Department of	<input type="checkbox"/>	SWRCB: Clean Water Grants
<input type="checkbox"/>	Delta Protection Commission	<input checked="" type="checkbox"/>	SWRCB: Water Quality
<input type="checkbox"/>	Education, Department of	<input type="checkbox"/>	SWRCB: Water Rights
<input checked="" type="checkbox"/>	Energy Commission	<input type="checkbox"/>	Tahoe Regional Planning Agency
<input checked="" type="checkbox"/>	Fish & Game Region # <u>5</u>	<input checked="" type="checkbox"/>	Toxic Substances Control, Department of
<input checked="" type="checkbox"/>	Food & Agriculture, Department of	<input checked="" type="checkbox"/>	Water Resources, Department of
<input checked="" type="checkbox"/>	Forestry and Fire Protection, Department of	<input type="checkbox"/>	Other: _____
<input checked="" type="checkbox"/>	General Services, Department of	<input type="checkbox"/>	Other: _____
<input checked="" type="checkbox"/>	Health Services, Department of		
<input type="checkbox"/>	Housing & Community Development		
<input checked="" type="checkbox"/>	Native American Heritage Commission		
<input checked="" type="checkbox"/>	Office of Historic Preservation		
<input type="checkbox"/>	Office of Public School Construction		

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Local Public Review Period (to be filled in by lead agency)

Starting Date November 21, 2013 Ending Date January 10, 2014 by 12:00 pm  
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Lead Agency (Complete if Applicable):

Consulting Firm: CH2M HILL Engineers, Inc.  
Address: 1000 Wilshire Boulevard, Suite 2100  
City/State/Zip: Los Angeles, CA 90017  
Contact: Robert Mason  
Phone: (714) 435-6113

Applicant: City of Los Angeles, Bureau of Sanitation  
Address: 1149 S. Broadway, 5<sup>th</sup> Floor, MS 944  
City/State/Zip: Los Angeles, CA 90015  
Phone: (213) 485-3774

Signature of Lead Agency Representative: 

Date: 11/18/2013  
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Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



**Appendix B**  
**County Clerk Filing of Draft Program EIR**

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**NOTICE OF COMPLETION AND AVAILABILITY  
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (Draft Program EIR)  
CITY OF LOS ANGELES COMMERCIAL AND MULTIFAMILY FRANCHISE HAULING  
(ZERO WASTE LA)**

EIR-13-015-BS

**SCH # 2013021052**

The City of Los Angeles will consider the adoption of an ordinance to establish and implement an exclusive waste franchise system on a citywide basis for collection and handling of Solid Resources (including solid waste, organic material, and recyclables) from commercial and multifamily establishments currently serviced by permitted private haulers within the City.

The Draft Program EIR is available for public review from November 21, 2013 to January 10, 2014. Please send your written comments no later than 12:00 noon on Friday, January 10, 2014 to Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5<sup>th</sup> Floor, Mail Stop 944, Los Angeles, CA 90015.

The following public meetings will be held to receive comments on the Draft Program EIR:

**Monday, December 9, 2013, 6:00pm - 7:30pm**, 19040 Vanowen St. Reseda, CA

**Tuesday, December 10, 2013, 6:00pm - 7:30pm**, 13520 Van Nuys Blvd., Suite 220, Pacoima, CA

**Wednesday, December 11, 2013, 6:00pm - 7:30pm**, 2920 Overland Ave., Los Angeles, CA

**Thursday, December 12, 2013, 6:00pm - 7:30pm**, 560 N Western Ave., San Pedro, CA

**Monday, December 16, 2013, 2:00pm - 4:00pm**, City Hall, 200 N Spring St., 4th Fl. Media Room, Los Angeles, CA

**Monday, December 16, 2013, 6:00pm - 7:30pm**, 7020 S Figueroa St., Los Angeles, CA

The Draft Program EIR is available at City of Los Angeles Bureau of Sanitation, 1149 S. Broadway, 5<sup>th</sup> Floor, Los Angeles, CA 90015, at [www.lacitysan.org](http://www.lacitysan.org) under *What's new...*, and at the following public libraries:

**Central Library**, 630 W. 5th St., Los Angeles

**Northridge Library**, 9051 Darby Ave., Northridge

**Encino-Tarzana Library**, 18231 Ventura Blvd., Tarzana

**West LA Regional Library**, 11360 Santa Monica Blvd., Los Angeles

**Lincoln Heights Library**, 2530 Workman St., Los Angeles

**Robert Louis Stevenson**, 803 Spence St., Los Angeles

**San Pedro Regional Library**, 931 S. Gaffey St. San Pedro

**Van Nuys Branch Library**, 6250 Sylmar Ave., Van Nuys

**ORIGINAL FILED**  
**NOV 21 2013**  
**LOS ANGELES COUNTY CLERK**

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Appendix C  
Public Notices for Draft Program EIR

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**NOTICE OF COMPLETION AND AVAILABILITY  
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (Draft PEIR)  
CITY OF LOS ANGELES COMMERCIAL AND MULTIFAMILY FRANCHISE HAULING  
(ZERO WASTE LA)**

SCH # 2013021052

The City of Los Angeles will consider the adoption of an ordinance to establish and implement an exclusive waste franchise system on a citywide basis for collection and handling of Solid Resources (including solid waste, organic material, and recyclables) from commercial and multifamily establishments currently serviced by permitted private haulers within the City.

The Draft PEIR is available for public review from November 21, 2013 to January 10, 2014. Please send your written comments no later than 12:00 noon on Friday, January 10, 2014 to Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5<sup>th</sup> Floor, Mail Stop 944, Los Angeles, CA 90015.

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Pacoima, CA

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Robert Louis Stevenson, 803 Spence St., Los Angeles

San Pedro Regional Library, 931 S. Gaffey St. San Pedro

Van Nuys Branch Library, 6250 Sylmar Ave., Van Nuys



ԿԼԵՆՏԷՅԼ ԳԼԵՆԴԵԼ

«Մենք Կ'աշխատենք Վերադառնալ».  
Երեւանի Պետական Կամերային Նուագախմբի Ելոյթը Գլենդելի «Ալեքս» Թատրոնում

ԱՆԻ ԹԱԴԷՈՍԵԱՆ

Արամ Ռաչատրեանի 110ամեայ յոբելեանին նուիրուած միջոցառումների շարքում՝ Երեւանի Պետական կամերային նուագախումբը ելոյթ ունեցաւ Գլենդելի «Ալեքս» թատրոնում: Համերգն ընդունուեց մեծ ոգեւորութեամբ, չդադարող ծափերով: Նուագախմբի մասնագիտական հմտութիւնը ոչ միայն հիացմունքի, այլ լեւ հպարտութեան էր արժանի: «Ասպարէզ»ին յաջողուեց նուագախմբի անդամներին հանդիպել համերգից անմիջապէս յետոյ: Բեմի յետեւում, ժպիտը դէմքին՝ շնորհաւորանքներ էր ընդունում Երեւանի Պետական կամերային նուագախմբի գեղարուեստական ղեկավար եւ գլխաւոր դիրիժոր Վահան Մարտիրոսեանը: «Սպասումներն արդարացա՞ն»՝ եղաւ առաջին հարցս: «Ամէն համերգի ժամանակ էլ



սպասումները նոյն են՝ ակնկալում ենք ջերմ ընդունելութիւն», պատասխանում է նա, «բայց այսօր ինձ համար շատ մեծ անակնկալ ու ուրախութիւն էր, որովհետեւ ես անձամբ առաջին անգամ եմ Լոս Անջելեսում ելոյթ ունենում, տեսայ ինչպիսի ջերմ ունկնդիր ունենք: Ես գիտեմ, որ

շատ հայեր կային դահլիճում, շատ ուրախ եմ»: Ջութակահար Աստղիկ Վարդանեանը, ով նոյնպէս յուզուած էր ջերմ ընդունելութիւնից, նկատեց, որ Հայաստանում աւելի մեծ է համերգին մասնակցող երիտասարդների թիւը. «Շատ ջերմ ընդունելութիւն էր այսօր, շատ ուրախ էինք նուագելիս՝ մեզ վարակում էր դաճիճի ոգեւորութիւնը»: Վահան Մարտիրոսեանը 2011 թուականից ղեկավարում է Երեւանի Պետական կամերային նուագախումբը: Վերջին տարիներ

Վահան Մարտիրոսեանը հանդէս է գալու որպէս դաշնակահար, դիրիժոր Ռոբերտ Միքէյեանի գլխաւորութեամբ: «Մտահղացումները շատ են, ֆինանսական խնդիրներն են, որ միշտ արգելք են դառնում», խոստովանում է նա: «Նուագախումբը յիսուն տարուայ պատմութիւն ունեցող կայացած նուագախումբ է», շարունակում է Վահան Մարտիրոսեանը, «իհարկէ, լաւ նուագելը լաւ վարձատրուելու հետ կապ չունի, սակայն մենք պէտք է ամէն ինչ անենք, որպէսզի աշխարհի ոչ մի երկրին չզիջող



րին խումբը բաղմամբի հիւրախաղերի է մասնակցել, Արամ Ռաչատրեանի 110ամեայ յոբելեանական միջոցառումների շրջանակում հանդէս եկել Ֆրանսիայում եւ Շուեյցարիայում: «Նուագախումբը արդէն կայացած է, եւ ես հպարտ եմ՝ աշխատելով այսպիսի կազմի հետ: Նուագախմբի իւրաքանչիւր անդամ մեծ երաժիշտ է», ասում է դիրիժորը: Կամերային նուագախմբի նախորդ ելոյթը Լոս Անջելեսի բեմում կայացել էր դիրիժոր Արամ Ղարաբեկեանի ղեկավարութեամբ: «Ես միշտ պատասխանատուութիւն եմ զգում ցանկացած աշխատանք ստանձնելով, «առաւել՝ Արամ Ղարաբեկեանից յետոյ, թէպէտ ես իմ կեանքում նրան չեմ հանդիպել» նշում է Վահան Մարտիրոսեանը: Կամերային նուագախումբը գործում է ազատ բեմահարթակ սկզբունքով, այսինքն հրաւիրեալ երաժիշտներով, ճկուն գաղափարներով եւ հնարաւոր բոլոր անակնկալներով: Ֆրեզնոյում կայանալիք համերգի ժամանակ

նուագախմբի անդամները կարիքներ չունենան: Մենք մեր ծրագրուածից աւելի շատ համերգներ ենք ունեցել, դեռ շատ հրաւերներ էլ ունենք Եւրոպայից: Այնպէս որ, շատ անելիքներ ունենք»: Հանդիսատեսը յատկապէս մեծ ոգեւորութեամբ ընդունեց հայ կոմպոզիտորների գործերը: Վահան Մարտիրոսեանը նպատակ ունի նուագացանկը հարստացնելու նոր, ժամանակից հայ կոմպոզիտորների գործերով: «Ես ամէն օր նոր ստեղծագործութիւն են բացայայտում», ասում է Վահան Մարտիրոսեանը, կոչ անելով բոլոր հայ կոմպոզիտորներին՝ ուղարկել իրենց ստեղծագործութիւնները: «Ես միշտ ժամանակ կ'ունենամ դրանք ուսումնասիրելու համար»: Մեզ հրաժեշտ տալուց առաջ Վահան Մարտիրոսեանը հրաւիրեց միշտ ներկայ լինել համերգներին. «Սիրում եմ լեփ լեցուն դահլիճներ, նորից եկէք, մենք կ'աշխատենք վերադառնալ»:

**Ամբողջացման Եւ Տրամադրելիութեան Ազդ Իջեալայրի Վրայ Ազդեցութեան Տեղեկագիրի Ծրագրի Նախագիծի Մասին (Draft PIER) Լոս Անճելըս Քաղաքի Առեւտրական Եւ Բազմաընտանիք Կալուածներու Աղբահաւաքման Համակարգ (ZERO WASTE LA)**

SCH # 2013021052

Լոս Անճելըս քաղաքապետութիւնը կը քննէ որդեգրումը օրէնքի մը, որ պիտի առաջնորդէ աղբահաւաքման բացարձակ համակարգի մը հաստատման եւ գործադրութեան, որպէսզի կարելի ըլլայ քաղաքի տարածքին թափօնները, ներառեալ՝ կարծր աղբ (solid waste), վերամշակելի ու բնական նիւթեր, հաւաքել առեւտրական եւ բազմաընտանիք կալուածներէ, որոնցմէ աղբերը ներկայիս կը հաւաքուին սեփական ընկերութեանց կողմէ:

Սոյն ծրագիրին նախագիծին՝ միջեալայրին վրայ ազդեցութեան տեղեկագիրը (Draft PIER) քննարկումի համար տրամադրելի է հանրութեան 21 Նոյեմբեր, 2013էն 10 Յունուար, 2014: Այս մասին ձեր գրաւոր կարծիքները հաճեցէք ուղարկել ամէնէն ուշը մինչեւ Ուրբաթ, Յունուար 10ի կէսօր՝ Տէնիլը Քէյ. Մէյըրզին, հետեւեալ հասցեով՝ Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015:

Քննարկումի նպատակով նաեւ հետեւեալ հանրային հաւաքները տեղի պիտի ունենան, հետեւեալ թուականներուն եւ վայրերուն մէջ.

- **Երկուշաբթի, 9 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,** 19040 Vanowen St. Reseda, CA
- **Երեքշաբթի, 10 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,** 13520 Van Nuys Blvd., Suite 220, Pacoima, CA
- **Չորեքշաբթի, 11 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,** 2920 Overland Ave., Los Angeles, CA
- **Հինգշաբթի, 12 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,** 560 N. Western Ave., San Pedro, CA
- **Երկուշաբթի, 16 Դեկտեմբեր, 2013, Կ.Ե. ժամը 2էն 4,** Լոս Անճելըսի քաղաքապետարանին մէջ, 200 N. Spring St., 4th Fl. Media Room, Los Angeles, CA
- **Երկուշաբթի, 16 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,** 7020 S Figueroa St., Los Angeles, CA:

«Draft PEIR»ը կը գտնուի Լոս Անճելըսի քաղաքապետարանին աղբահաւաքման բաժանմունքի կեդրոնին մէջ, որուն հասցէն է՝ 1149 S. Broadway (հինգերորդ յարկ), Los Angeles, CA 90015:

Տեղեկագիրը կարելի է կարդալ նաեւ [www.lacitysan.org](http://www.lacitysan.org) կայքին՝ »What's new...« բաժնին մէջ, կամ Լոս Անճելըսի հետեւեալ հանրային գրադարանները այցելելով.

- Central Library, 630 W. 5th St., Los Angeles
- Northridge Library, 9051 Darby Ave., Northridge
- Encino-Tarzana Library, 18231 Ventura Blvd., Tarzana
- West LA Regional Library, 11360 Santa Monica Blvd., Los Angeles
- Lincoln Heights Library, 2530 Workman St., Los Angeles
- Robert Louis Stevenson, 803 Spence St., Los Angeles
- San Pedro Regional Library, 931 S. Gaffey St. San Pedro
- Van Nuys Branch Library, 6250 Sylmar Ave., Van Nuys:

**NEDA NAKHJAVANI**  
*attorney at law*

100 N. Brand Blvd. Ste. 205 Glendale CA 91203  
Tel: 818.476.0125

Kristine 818.220.0294 (Armenian) Tina 818.640.8910 (Farsi) Ellen 818.319.2247 (Russian)

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ԿԼԵՆՏԷՅԼ ԳԼԵՆԴԵԼ

Ամբողջացման եւ Տրամադրելիութեան Ազդ  
Միջավայրի Վրայ Ազդեցութեան Տեղեկագիրի  
Ծրագիրի Նախագիծի Մասին (Draft PIER)  
Լոս Անճելըս Քաղաքի Առետրական  
եւ Բազմաընտանիք  
Կալուածներու Աղբահաւաքման Համակարգ  
(ZERO WASTE LA)

SCH # 2013021052

Լոս Անճելըս քաղաքապետութիւնը կը քննէ որդեգրումը օրէնքի մը, որ պիտի առաջնորդէ աղբահաւաքման բացարձակ համակարգի մը հաստատման եւ գործադրութեան, որպէսզի կարելի ըլլայ քաղաքի տարածքին թափօնները, ներառեալ՝ կարծր աղբ (solid waste), վերամշակելի ու բնական նիւթեր, հաւաքել առետրական եւ բազմաընտանիք կալուածներէ, որոնցմէ աղբերը ներկայիս կը հաւաքուին սեփական ընկերութեանց կողմէ:

Սոյն ծրագիրին նախագիծին՝ միջավայրին վրայ ազդեցութեան տեղեկագիրը (Draft PIER) քննարկումի համար տրամադրելի է հանրութեան 21 Նոյեմբեր, 2013էն 10 Յունուար, 2014: Այս մասին ձեր գրաւոր կարծիքները հաճեցէք ուղարկել ամէնէն ուշը մինչեւ Ուրբաթ, Յունուար 10ի կէսօր՝ Տէնիըլ Քէյ. Մէյըրզին, հետեւեալ հասցեով՝ Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015:  
Քննարկումի նպատակով նաեւ հետեւեալ հանրային հաւաքները տեղի պիտի ունենան, հետեւեալ թուականներուն եւ վայրերուն մէջ.

- **Երկուշաբթի, 9 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,**  
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- **Չորեքշաբթի, 11 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,**  
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560 N. Western Ave., San Pedro, CA
- **Երկուշաբթի, 16 Դեկտեմբեր, 2013, Կ.Ե. ժամը 2էն 4,**  
Լոս Անճելըսի քաղաքապետարանին մէջ,  
200 N. Spring S.t, 4th Fl. Media Room, Los Angeles, CA
- **Երկուշաբթի, 16 Դեկտեմբեր, 2013, Երեկոյեան ժամը 6էն 7:30,**  
7020 S Figueroa St., Los Angeles, CA:

«Draft PEIR»ը կը գտնուի Լոս Անճելըսի քաղաքապետարանին աղբահաւաքման բաժանմունքի կեդրոնին մէջ, որուն հասցէն է՝ 1149 S. Broadway (հինգերորդ յարկ), Los Angeles, CA 90015:  
Տեղեկագիրը կարելի է կարդալ նաեւ **www.lacitysan.org** կայքին՝ »What’s new...« բաժինին մէջ, կամ Լոս Անճելըսի հետեւեալ հանրային գրադարանները այցելելով.

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- Robert Louis Stevenson, 803 Spence St., Los Angeles
- San Pedro Regional Library, 931 S. Gaffey St. San Pedro
- Van Nuys Branch Library, 6250 Sylmar Ave., Van Nuys:



# “구순구개열 환자에 새 삶을”

## 코리아타운 로타리클럽 베트남 방문 65명 수술지원 계획

### 내년 3월까지 500명 달성 목표

“더 많은 어린이 구순구개열 환자를 돕기 위해 노력하겠습니다.”

코리아타운 로타리클럽(회장 김형진)이 오퍼레이션 스마일 재단과 함께 베트남을 직접 방문해 어린이 구순구개열 환자 수술을 돕는다.

국제 로타리 5280지구 소속 코리아타운 로타리클럽은 오퍼레이션 스마일 재단과 협력해 지난 2005년부터 개발도상국 어린이들 가운데 구순구개열을 앓고 있는 환자들이 수술을 받을 수 있도록 돕고 있다.

구순구개열은 흔히 ‘언청이’로 알려진 질병으로 입술(구순) 및 입천장(구개)을 만드는 조직이 적절히 붙지



오퍼레이션 스마일 재단과 함께 전 세계 구순구개열 어린이 환자 수술을 돕고 있는 코리아타운 로타리클럽 임원진은 베트남을 직접 방문해 아이들에게 도움을 줄 계획이다. 왼쪽부터 김형진 회장, 선동진 국제타리 5280지구 2015-16년도 거버너 당선자, 장문식 총무.

코리아 로타리클럽은 이미 2011년부터 2012년 사이에 구순구개열을

들을 도울 수 있을 것이라며 “서울 강북지역을 관할하는 국제 로타리



## 남가주 사랑의교회 23일 친구초청 축제

남가주 사랑의교회 한어고등부가 추수감사절을 맞이해 ‘친구초청 축제 FMI53’을 개최한다. 오는 23일 오후 4시 남가주 사랑의교회 교육관 KDC에서 펼쳐지는 FMI53은 153명의 고등학생들이 준비한 ‘팔로우 미(Follow Me)’ 퍼드와 음악이 있는 축제이다. 사랑의교회 한어고등부 학생들과 함께 다양한 게임부스, 음식부스, 야외무대에서 펼쳐지는 라이브 뮤직을 통해 몸과 마음이 사랑으로 충만해지는 계기를 제공하며 사진부스에서 친구들과 함께 사진도 찍을 수 있다. 한어고등부 학생들이 친구초청 축제 FMI53을 위해 멋진 라이브 뮤직을 연주하고 있다.

## 상명대 동창회 환영모임

남가주 상명대학교 동창회(회장 이원암)가 23일 오후 6시 JJ 그랜드 호텔 내 우미관에서 한국 동창회장 김종희 명예회장의 LA 방문 환영모임을 갖는다.

(626)274-0785, (213)380-3426

## 진명 내달 7일 송년회

남가주 진명여자 중고등학교 총동창회(회장 이영란)는 12월7일 오전 11시 LA 한인타운 내 가든 스위트 호텔에서 2013년도 송년모임을 갖는다. 참가비는 무료.

문의 (714)697-9578

## 평택중고 내달 14일 송년회

남가주 평택중·고등학교 동문회(회장 조종호)는 오는 12월14일 오후 6시 만리장성(989 S. Dewey Ave.)에서 송년 모임을 갖는다. 회비는 없으나 도네이션을 받는다.

문의 (213)368-0355

## “류현진 통역 세 번 사양”

### 다저스 마틴 김씨 비화 공개

“내가 통역을 안 하면 (류)현진이 공을 안 잡겠다고 겁을 주더라구요.”

‘몬스터’ 류현진의 통역으로 잘 알려진 LA 다저스의 마틴 김(34·사진) 한국 담당 마케팅 매니저가 지난 18일 뉴욕 맨해튼 코리아 소사이어티의 ‘영 프로페셔널’과의 대화에 초대됐다.

인터넷 토크쇼 호스트인 케빈 김의 사회로 진행된 이날 행사에서 마틴 김은 류현진과 관련한 에피소드와 스포츠마케팅의 세계를 들려주어 좋은 반응을 얻었다.

사실 그는 마케팅 전문가다. 워싱턴 DC의 조지 워싱턴 대학에서 국제 비즈니스와 마케팅을 복수전공한 그는 졸업 후 워싱턴의 광고회사에 근무하다 LA로 이주했다. 우연한 기회에 LA 다저스



이 마음에 안 들더라도 마틴 김과의 친근한 관계 덕분에 호감을 갖도록 전략을 세웠다는 후

니아 (Covered California)에 관한 설명회를 갖는다.

이번 설명회에서는 지난 10월1일부터 가입이 시작된 커버드 캘리포니아의 내용에 대한 설명과 가입자격, 플랜의 종류와 보험료 보조금에 대해서 자세히 알려준다. 특히, 가입 전 보험료 산정을 미리 해볼 수 있도록 설명 및 상담도 할 예정이다.

보험상품의 비교 및 가입이 쉬워지고 저렴한 보험상품 및 재정지원이 가능

하다. 현재 커버드 캘리포니아 홈페이지를 통해 가입자들은 기본내용을 참고할 수 있고, 본인의 가족 구성원과 수입내용에 따른 보험료와 보조금 지원액에 대해서 알아볼 수 있다.

문의 (323)937-3718

### 나란다 불교 센터

Nalanda Buddhist Center

- 치유명상반 : 강사 김소연 매주 화요일 저녁 7:00 ~ 8:30
- 초기불교반 : 강사 박재욱 매주 수요일 저녁 7:00 ~ 8:30
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## LOS ANGELES 시 상업 및 다세대 시설 쓰레기 독점 수집 처리 (ZERO WASTE LA)

### 프로그램 환경 영향 보고서 초안 (Draft PEIR) 완성 및 이용 가능성 공고

SCH # 2013021052

로스앤젤레스시는 현재 시가 허용한 개인 용역업자들에 의해 수행되고 있는 상업 및 다세대 시설의 쓰레기 수집 및 처리에 대한 전용 쓰레기 독점 시스템을 시 전체 기준으로 구축하고 시행하기 위한 조례 채택을 고려하고 있습니다.

보고서 초안은 2013년 11월 21일에서 2014년 1월 10일 사이에 공개 검토가 가능합니다.

귀하의 의견은 2014년 1월 10일 (금요일) 정오까지 서면으로 보내 주십시오.

(주소, Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015.)

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12월9일 (월), 하오6시-하오7시30분, 19040 Vanowen St., Reseda, CA

12월10일 (화), 하오6시-하오 7시30분, 13520 Van Nuys Blvd., Suite 220, Pacoima, CA

12월11일 (수), 하오6시-하오 7시30분, 2920 Overland Ave., Los Angeles, CA

12월12일 (목), 하오6시-하오 7시30분, 560 N Western Ave., San Pedro, CA

12월16일 (월), 하오2시-하오 4시, City Hall, 200 N Spring St., 4th Fl. Media Room, Los Angeles, CA

12월16일 (월), 하오6시-하오7시30분, 7020 S Figueroa St., Los Angeles, CA

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# LOS ANGELES 시 상업 및 다세대 시설 쓰레기 독점 수집 처리 (ZERO WASTE LA)

## 프로그램 환경 영향 보고서 초안 (Draft PEIR)

### 완성 및 이용 가능성 공고

SCH # 2013021052

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(주소, Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015.)

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21 day of NOV, 20 13

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Signature

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Proof of publication:

**AVISO DE FINALIZACIÓN Y DISPONIBILIDAD  
PROYECTO DE PROGRAMA DE REPORTE DE IMPACTO AMBIENTAL  
(Proyecto PEIR, por sus siglas en inglés)  
FRANQUICIA DE ACARREO COMERCIAL Y MULTIFAMILIAR DE  
LA CIUDAD DE LOS ÁNGELES  
(CERO RESIDUOS LA)**

SCH # 2013021052

La Ciudad de Los Angeles considerará la adopción de una ordenanza para establecer e implementar un exclusivo sistema de franquicias de tratamiento de residuos en toda la ciudad para la recolección y manejo de los residuos sólidos (incluyendo desechos sólidos, materiales orgánicos y reciclables) de los establecimientos comerciales y multifamiliares actualmente atendidos por transportistas privados permitidos dentro de la Ciudad.

El Proyecto PEIR está disponible para revisión pública del 21 de noviembre de 2013 al 10 de enero de 2014. Por favor envíe sus comentarios por escrito antes de las 12:00 del mediodía del viernes 10 de enero de 2014 a Daniel K. Meyers, Director Adjunto de la División, División de Reciclaje de Recursos Sólidos en toda la Ciudad, Oficina de Saneamiento, 1149 S. Broadway, 5° Piso, Mail Stop 944, Los Angeles, CA 90015.

Las siguientes reuniones públicas se llevarán a cabo para recibir comentarios sobre el Proyecto PEIR:

**Lunes 9 de diciembre de 2013, 6:00pm - 7:30pm**, 19040 Vanowen St. Reseda, CA

**Martes 10 de diciembre de 2013, 6:00pm - 7:30pm**, 13520 Van Nuys Blvd., Despacho 220, Pacoima, CA

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En observación del día de Acción de Gracias, nuestras oficinas estarán cerradas el Jueves 28 y Viernes 29 de noviembre del 2013. Nuestras fechas y horas límites para publicar su anuncio serán:

Fecha de publicación	Fecha y hora límite
Jueves 28 de noviembre 2013.....	Miércoles 27 de noviembre 2013 12:00PM
Viernes 29 de noviembre 2013.....	Miércoles 27 de noviembre 2013 12:00PM
Sábado 30 de noviembre 2013.....	Miércoles 27 de noviembre 2013 1:00PM
Domingo 1 de diciembre 2013.....	Miércoles 27 de noviembre 2013 1:00PM
Lunes 2 de diciembre 2013.....	Miércoles 27 de noviembre 2013 1:00PM

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Date of publication	Deadline
Thursday November 28th 2013.....	Wednesday November 27th 2013 12:00PM
Friday November 29th 2013.....	Wednesday November 27th 2013 12:00PM
Saturday November 30th 2013.....	Wednesday November 27th 2013 1:00PM
Sunday December 1st 2013.....	Wednesday November 27th 2013 1:00PM
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#### AVISOS LEGALES

**FICTITIOUS BUSINESS NAME STATEMENT**  
 #2013215679  
 The following person is doing business as:  
 El Marquez de Amelita Restaurant  
 1128 S. Atlantic Blvd.  
 Los Angeles, CA 90022  
 (LA COUNTY)  
 Marcos Gonzalez Mendoza  
 9435 Richland Ln.  
 Pico Rivera, CA 90660  
 Amelita D. Bautista Zavaleta  
 9435 Richland Ln.  
 Pico Rivera, CA 90660  
 This business is conducted by: A General Partnership  
 The registrant has not commenced to transact business under the fictitious business names listed herein.  
 SIGNED: Marcos Gonzalez Mendoza  
 This statement was filed with the County Clerk of Los Angeles County on: 10/16/2013.  
 NOTICE: THIS FICTITIOUS BUSINESS NAME STATEMENT EXPIRES FIVE YEARS FROM DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE.  
 The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state, or common law (See section 14411 et seq., Business and Professions Code).  
 Pub: 11/14, 11/21, 11/28, & 12/05/2013

#### AVISOS LEGALES

**FICTITIOUS BUSINESS NAME STATEMENT**  
 #2013218011  
 The following person is doing business as:  
 JADE EYE  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 A/IFON  
 3609638  
 (LA COUNTY)  
 JADE EYE DESIGN  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 This business is conducted by: A Corporation  
 The registrant has commenced to transact business under the fictitious business names listed herein on 10/14/2013.  
 SIGNED: Stelvy Reyes  
 This statement was filed with the County Clerk of Los Angeles County on: 11/12/2013.  
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 Pub: 11/21, 11/28, 12/5, & 12/12/2013

#### AVISOS LEGALES

**FICTITIOUS BUSINESS NAME STATEMENT**  
 #2013225444  
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 130 South Avenue 63  
 Los Angeles, CA 90042  
 A/IFON  
 3609638  
 (LA COUNTY)  
 JADE EYE DESIGN  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 This business is conducted by: A Corporation  
 The registrant has commenced to transact business under the fictitious business names listed herein on 10/14/2013.  
 SIGNED: Stelvy Reyes  
 This statement was filed with the County Clerk of Los Angeles County on: 11/12/2013.  
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 Los Angeles, CA 90042  
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 3609638  
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 JADE EYE DESIGN  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 This business is conducted by: A Corporation  
 The registrant has commenced to transact business under the fictitious business names listed herein on 10/14/2013.  
 SIGNED: Stelvy Reyes  
 This statement was filed with the County Clerk of Los Angeles County on: 11/12/2013.  
 NOTICE: THIS FICTITIOUS BUSINESS NAME STATEMENT EXPIRES FIVE YEARS FROM DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE.  
 The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state, or common law (See section 14411 et seq., Business and Professions Code).  
 Pub: 11/21, 11/28, 12/5, & 12/12/2013

#### Avisos Legales

Visitenos en la red  
[laopinion.com/clasificados](http://laopinion.com/clasificados)

#### Avisos Legales

**FICTITIOUS BUSINESS NAME STATEMENT**  
 #2013225444  
 The following person is doing business as:  
 JADE EYE  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 A/IFON  
 3609638  
 (LA COUNTY)  
 JADE EYE DESIGN  
 130 South Avenue 63  
 Los Angeles, CA 90042  
 This business is conducted by: A Corporation  
 The registrant has commenced to transact business under the fictitious business names listed herein on 10/14/2013.  
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#### Negocios

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#### Oportunidad de Negocios

**GRAN OPORTUNIDAD**  
 Restaurante Grande en PASADENA  
 Equipado y Con Licencia de Cerveza y Vino  
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 Buscamos Comprador, Socio o Rentamos el Negocio  
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Ingreso \$1500/m  
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**SEA SU PROPIO PATRON**  
**RUTAS DE LIMPIEZA DOMESTICA**  
 Con clientes  
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 Precio \$4500  
 Todos los tamaños  
**1-800-765-7530**  
 Informe a otros lo que usted tiene para vender.  
 Llame al: (888) 526-7464  
**Clasificados de La Opinión**

#### Oportunidad de Negocios

**COMIENCE SU PROPIO NEGOCIO**  
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 Mercancia General para Swapmeets  
 Ventas de Yarda  
**Desde \$250 ¡LA PALETA!**  
**TRADEX**  
 125 Vineland Ave  
 City of Industry, CA 91746  
**626-968-8885**  
**Ahorre \$10 con este cupón**  
 Obtenga Mercancia de Marcas Reconocidas

#### Oportunidad de Negocios

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 Gardena Nissan  
 1670 Redondo Beach Blvd. Gardena CA 90247  
**(310) 909-7541**  
[www.gardenanissan.com](http://www.gardenanissan.com)  
 Cerca de 110 Fwy y 405 Fwy  
 Salida Redondo Beach Blvd.

## Gane Dinero Extra Como un CONTRATISTA INDEPENDIENTE Para La Opinión

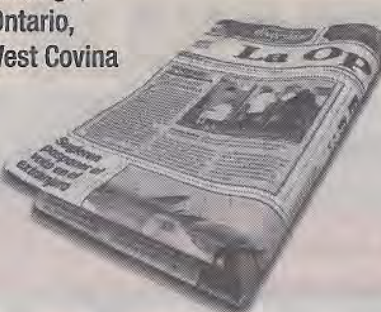
Con una familia que mantener es a veces difícil de proveer los cosas extras, cuando usted entrega La Opinión como un CONTRATISTA INDEPENDIENTE usted puede mantener sus días y tardes libres, mientras está ganado un ingreso adicional en las tempranas horas de la mañana.

Para las áreas de Rancho Cucamonga, Alta Loma, Montclair, Upland, Ontario, Chino, Walnut, Diamond Bar, West Covina y ciudades cercanas.

**Requisitos para Aplicar:**

- Debe tener Vehículo confiable
- Licencia de Manejo con Seguro
- Un Historial de DMV aceptable.

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**AVISO DE FINALIZACIÓN Y DISPONIBILIDAD  
PROYECTO DE PROGRAMA DE REPORTE DE IMPACTO AMBIENTAL  
(Proyecto PEIR, por sus siglas en inglés)  
FRANQUICIA DE ACARREO COMERCIAL Y MULTIFAMILIAR DE  
LA CIUDAD DE LOS ÁNGELES  
(CERO RESIDUOS LA)**

SCH # 2013021052

La Ciudad de Los Ángeles considerará la adopción de una ordenanza para establecer e implementar un exclusivo sistema de franquicias de tratamiento de residuos en toda la ciudad para la recolección y manejo de los residuos sólidos (incluyendo desechos sólidos, materiales orgánicos y reciclables) de los establecimientos comerciales y multifamiliares actualmente atendidos por transportistas privados permitidos dentro de la Ciudad.

El Proyecto PEIR está disponible para revisión pública del 21 de noviembre de 2013 al 10 de enero de 2014. Por favor envíe sus comentarios por escrito antes de las 12:00 del mediodía del viernes 10 de enero de 2014 a Daniel K. Meyers, Director Adjunto de la División, División de Reciclaje de Recursos Sólidos en toda la Ciudad, Oficina de Saneamiento, 1149 S. Broadway, 5° Piso, Mail Stop 944, Los Ángeles, CA 90015.

Las siguientes reuniones públicas se llevarán a cabo para recibir comentarios sobre el Proyecto PEIR:

**Lunes 9 de diciembre de 2013, 6:00pm - 7:30pm**, 19040 Vanowen St. Reseda, CA

**Martes 10 de diciembre de 2013, 6:00pm - 7:30pm**, 13520 Van Nuys Blvd., Despacho 220, Pacoima, CA

**Miércoles 11 de diciembre de 2013, 6:00pm - 7:30pm**, 2920 Overland Ave., Los Ángeles, CA

**Jueves 12 de diciembre de 2013, 6:00pm - 7:30pm**, 560 N Western Ave., San Pedro, CA

**Lunes 16 de diciembre de 2013, 2:00pm - 4:00pm**, Ayuntamiento, 200 N Spring St., 4th Piso Salón de Medios, Los Angeles, CA

**Lunes 16 de diciembre de 2013, 6:00pm - 7:30pm**, 7020 S Figueroa St. Los Ángeles, CA

El Proyecto PEIR está disponible en la Oficina de Saneamiento de la Ciudad de Los Ángeles, 1149 S. Broadway, 5° Piso, Los Ángeles, CA 90015, en [www.lacitysan.org](http://www.lacitysan.org) bajo Qué Hay de Nuevo..., y en las siguientes bibliotecas públicas:

Biblioteca Central, 630 W. 5th St., Los Ángeles

Biblioteca Northridge, 9051 Darby Ave., Northridge

Biblioteca Encino-Tarzana, 18231 Ventura Blvd., Tarzana

Biblioteca Regional West LA, 11360 Santa Mónica Blvd., Los Ángeles

Biblioteca Lincoln Heights, 2530 Workman St., Los Ángeles

Robert Louis Stevenson, 803 Spence St., Los Ángeles

Biblioteca San Pedro Regional, 931 S. Gaffey St. San Pedro

Sucursal de la Biblioteca Van Nuys, 6250 Sylmar Ave., Van Nuys



# 10月外銷訂單衝次高 連四紅

iPhone 5S等智慧手機新品帶動 金額達395億美元 但全年正成長恐難達陣

記者葉小慧／台北21日電

iPhone 5S等智慧型手機新品上市，帶動外銷訂單報佳音，10月來到395.9億美元，為歷年單月次高，較去年同期成長3.2%，連四月成長，優於市場預期。但經濟部表示，今年全年要正成長，「差臨門一腳」，恐難達成。

外銷訂單年增率自今年7月由負轉正後，成長幅度逐月放大。經濟部表示，10月主要受惠歐美景氣逐步復甦，以及手持裝置新品因應聖誕消費備貨需求，帶動資訊通信產品組裝代工及電子產品訂單成長。

自給自足，連續三年獲利。

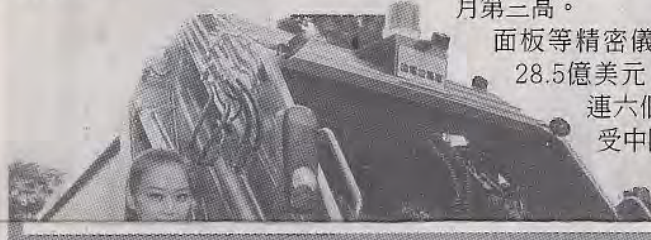
今年前十月外銷訂單金額為3595.7億美元，年減0.4%。去年全年以4410.1億美元寫下歷史高點，經濟部統計長林麗貞表示，今年全年外銷訂單可望超過4300億美元，但離正成長「還差臨門一腳」，可能不到4400億美元。換句話說，今年全年恐負成長。

從貨品別觀察，10月外銷訂單中，電子產品及資訊通信產品年增率持續成長，面板等精密儀器及傳統貨品接單仍然不振。其中，手持裝置市場榮景帶動晶圓製程、通訊晶片等需求上升，電子產品接單99.1億美元，寫下歷史單月新高紀錄，資訊通信產品10月接單106.6億美元，為歷史單月第三高。

面板等精密儀器產品10月接單28.5億美元，年減13.5%，已連六個月負成長，主要受中國大陸節能補貼政策結束以及進入庫存調整期影響。

經濟部表示，11月可能延續負成長格局，據傳中國大陸明年1月可能有節能補貼政策出台，雖未經過證實，若有這項利多，應有助面板產品外銷接單。

從地區別觀察，美國、歐洲及大陸訂單都比去年同期成長，分別年增9%、7.6%和1.2%。其中，美國訂單105.8億美元，為歷年單月次高。值得注意的是，東協六國訂單連二個月出現衰退，10月年負成長5.3%，主要是占東協六國訂單比重高達五成的新加坡，油品訂單明顯衰退；日本訂單呈現連續九個月衰退，所幸近二個月減幅從前面的二位數縮減到2%以內。



## 兩岸生技 東莞交大

記者郭政芬／新竹21日電

聯電榮譽副董事長宣明積極布局生技產業，繼興業公司做為生技展20日於交大舉辦「兩岸生技表會」及「莞交智綠壇」，為兩岸生技合作模範的一頁。

未來互資興業將遴選優秀產品可供銷售的台灣在中國大陸落地取得銷售外生技業者提早卡位大陸。

宣明智指出，這次將簽大的助學金合約，成立「司」，意思為「互相為彼與生計產業」，公司將負優秀的生技公司到中國去晉洪科技與互資、東莞市為首家接受到完整展業平歐元 39.465

### 完成及可用性的通告

### 影響環境的綱領草案報告書(Draft PEIR)

CITY OF LOS ANGELES COMMERCIAL AND MULTIFAMILY FRANCHISE HAULING (ZERO WASTE LA)

SCH # 2013021052

洛杉磯市將考慮通過一項法令，在全市範圍內來建立和實施特許經營獨家收集垃圾和回收物品處理(包括垃圾，有機材料和回收物品)來自於合法私人收集商，從商家和多家公寓康斗所收集的廢物。

這個Draft PEIR可於2013年11月21日至明年2014年1月10日供公眾審閱。請在2014年1月10日中午12時之前發送您的書面意見至Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015.

以下公共會議的地點日期和時間將收取各方對Draft PEIR的意見：

Monday, December 9, 2013, 6:00pm - 7:30pm

19040 Vanowen St. Reseda, CA

Tuesday, December 10, 2013, 6:00pm - 7:30pm

13520 Van Nuys Blvd., Suite 220, Pacoima, CA

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Draft PEIR可於City of Los Angeles Bureau of Sanitation

1149 S. Broadway, 5th Floor, Los Angeles, CA 90015

及上網 [www.lacitysan.org](http://www.lacitysan.org) under What's new...

和下列公眾圖書館提供審閱：

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West LA Regional Library

11360 Santa Monica Blvd., Los Angeles

Lincoln Heights Library

2530 Workman St., Los Angeles

Robert Louis Stevenson

803 Spence St., Los Angeles

San Pedro Regional Library

931 S. Gaffey St. San Pedro

Van Nuys Branch Library

6250 Sylmar Ave., Van Nuys

### 唯一真實自主審批直接放款

- 賣屋或重貨速度快利率低
- 外國人貸款無Visa無美國銀行帳戶ok
- 自雇主只看一年報稅表 ok
- 現金購屋可立刻兌現cash out
- 大額貸款LTV 85%至1百萬無MI
- 兌現cash out 75%至1.5 M11
- 存款可當收入計算
- 可擁有至10棟有貸款的房產

購屋、重貨、商業不動產、商業保理服務、不查個人收入公案貸款、SBA Loan 可不看信用分數、多種商業貸款方案、豐富的貸款經驗與專業知識，無論購屋或重貨都能有效幫助您處在最佳貸款優勢、免費提供貸款預審批准信

## 方案多！ 放款快！ 利息好！

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Wen 黃  
專線：626-  
Senior Mortgage F  
Wen.Huang@H

### 專精住家商業最新推出多項優惠 銀行直接審批，簡便快速

- 簡便低利率 不查收入貸款
- 外國人貸款35%頭款人無須來美
- 政府首次購屋優惠3.5%頭款免估價
- 潮水屋救星150%免估價
- 擔保人貸款，免除收入不足之煩惱
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住宅貸款  
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15年固定2.2%  
5年固定2.625%  
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SBA

Leann Li

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DRE#01237758 NMLS#370934

FP MORTGAGE, 請洽核桃市、阿爾迪亞、聖市、爾灣市各分公司

Dennis 許

(Dening Xu)

資深理財貸款專家

USC校友

會計金融專業

NMLS#938268

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自主審批，直接放款 自住屋5%頭款(非FHA)，買家

多種貸款服務，可達10個貸款 剛畢業學生貸款

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626-241-6910 Hana Financial 海納貸款銀行

阿市分行 388 E. Valley Blvd., #106, Alhambra, CA 91801

NMLS:323865 DRE:01509070 FHA Lender

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Lic #01455377

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◎100萬以下自住或投資不查收入5.25%起

◎可查收入、信用免手續費及估價費30年

◎商業公寓3.75%起

◎有大量新屋上市！誠徵買主

代理700家銀行24,000套貸款計畫

159 E. Live Oak Ave., Suite #201, Arcadia, CA



# 完成及可用性的通告

## 影響環境的綱領草案報告書(Draft PEIR)

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這個 Draft PEIR 可於 2013 年 11 月 21 日至明年 2014 年 1 月 10 日供公眾審閱。請在 2014 年 1 月 10 日中午 12 時之前發送您的書面意見至 Daniel K. Meyers, Assistant Division Manager, Solid Resources Citywide Recycling Division, Bureau of Sanitation, 1149 S. Broadway, 5th Floor, Mail Stop 944, Los Angeles, CA 90015.

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