

## Communication from Public

**Name:** Los Angeles Neighborhood Council Sustainability Alliance

**Date Submitted:** 08/06/2024 09:45 PM

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**Comments for Public Posting:** Dear Ms. Batikian, the LA Sanitation & Environment team, and City Council: We at the Los Angeles Neighborhood Council Sustainability Alliance (LANCSA), as an active member of Reusable LA, thank former and current Councilmembers Krekorian, Koretz, and O'Farrell, who led the effort to create the Comprehensive Plastics Reduction Program, and we thank LA Sanitation & Environment (LASAN) for your hard work developing it. Overall, we support the Draft Program Environmental Impact Report (PEIR) and recommend considering a project alternative that includes two additional upstream measures and removes some downstream measures: 1) include an additional upstream measure that would prohibit the sale of all products packaged in polyvinyl chloride (PVC) and polyvinylidene chloride (PVDC) 2) include an additional upstream measure that would prohibit new installations of artificial turf 3) prioritize cleaner, safer, and more sustainable solutions to plastic waste management by leaving out harmful black-bin facilities such as mixed material processing facilities (also known as dirty materials recovery facilities, or dirty MRFs), advanced thermal recycling technologies, and non-combustion thermal technologies facilities from the downstream measures. Thank you, Lisa Hart Executive Director Los Angeles Neighborhood Council Sustainability Alliance

# NEIGHBORHOOD COUNCIL SUSTAINABILITY ALLIANCE<sup>®</sup>

April 26, 2024

Re: Public Comment on the Comprehensive Plastics Reduction Program Draft PEIR

Dear Ms. Batikian, the LA Sanitation & Environment team, and City Council:

We at the Los Angeles Neighborhood Council Sustainability Alliance (LANCSA), as an active member of Reusable LA, thank former and current Councilmembers Krekorian, Koretz, and O'Farrell, who led the effort to create the Comprehensive Plastics Reduction Program, and we thank LA Sanitation & Environment (LASAN) for your hard work developing it.

Overall, we support the Draft Program Environmental Impact Report (PEIR) and recommend considering a project alternative that includes two additional upstream measures and removes some downstream measures:

- 1) include an **additional upstream measure** that would prohibit the sale of all products packaged in polyvinyl chloride (PVC) and polyvinylidene chloride (PVDC)
- 2) include an **additional upstream measure** that would prohibit new installations of artificial turf
- 3) prioritize cleaner, safer, and more sustainable solutions to plastic waste management by leaving out harmful black-bin facilities such as mixed material processing facilities (also known as dirty materials recovery facilities, or dirty MRFs), advanced thermal recycling technologies, and non-combustion thermal technologies facilities from the **downstream measures**.

More specifically, polyvinyl chloride (PVC) and polyvinylidene chloride (PVDC) are both not recyclable and are toxic, resulting in harmful exposures at every stage of their lifecycles. PVC in the waste stream causes problems regardless of where it ends up. PVC packaging can contaminate otherwise recyclable plastics, leading to an entire bale of recyclable material like polyethylene terephthalate (PET) being rejected for recycling or contaminating the finished product if it is missed. Even PVC that does not go in the recycling stream has a drastic environmental impact. PVC can be mixed in with other garbage and is either incinerated, which produces carcinogenic and persistent dioxins and furans, or sent to landfills, where the vinyl chloride contaminates landfill gas and releases harmful chemicals into the air and groundwater, both of which disproportionately impact frontline communities.

Second, due to artificial turf's human health hazards, environmental contamination, and negative impacts on wildlife, we recommend that LASAN include it in its list of upstream products to eliminate. All artificial turf contains hazardous PFAS (per- and polyfluoroalkyl) chemicals—which are known carcinogens, endocrine disruptors, and neurotoxins—and microplastics. Children and athletes who play on artificial turf are at increased risk of exposure, and because PFAS chemicals bioaccumulate, it is especially harmful to children, who are still developing. Runoff from artificial turf contaminates drinking water, rivers, and oceans with microplastics as well as with PFAS. The EPA has reported there is no safe level of PFOA or PFOS (part of the larger group of PFAS). In addition to risks of PFAS, artificial turf can reach temperatures that are 70 degrees F higher than the air temperature, readily reaching 180 degrees or more. This can create a heat-island effect, raising the temperature in the surrounding areas and leading to increased injuries, including skin burns and heat stress. Artificial turf is an impervious surface (per the EPA), impeding groundwater recharge and increasing the risk of flooding. It also off-gasses ethylene and methane, contributing to the climate crisis. Nothing lives in plastic. Artificial turf can kill the soil microbes and living organisms, as well as take away habitat from insects, birds, and local wildlife, contributing to the loss of biodiversity. Finally, it cannot be recycled. At the end of its eight-to-10-year lifecycle, the average high-school field will produce more than 2,208 pounds of plastic waste. At the landfill it will continue polluting the air, water, and soil.

Lastly, downstream black-bin measures such as “dirty MRFs,” advanced thermal recycling technologies, and non-combustion thermal technologies facilities have been shown to pose significant risks to public health, particularly in frontline communities already disproportionately burdened by environmental hazards. Advanced recycling or chemical recycling technologies are not new. Processes like pyrolysis, gasification, and others have been around for decades and have not helped remediate plastic pollution. The fervor behind these technologies comes from plastic companies desperate to keep the death cycle of plastic production in motion and create the virgin plastic feedstock needed to keep these industries running in the first place. Los Angeles will not meaningfully reduce plastics from the source if LASAN is considering the development of these facilities as a part of the Comprehensive Plastics Reduction Program. Advanced recycling releases toxic chemicals into the environment, contributes to climate change, isn't scalable or economically viable, and just does not fit into a circular economy.

We look forward to seeing this program, with our recommended changes, becoming a reality and the ordinances that are already on the books being followed, so that there is a true culture change here in Los Angeles and beyond and we can all (humans and otherwise) enjoy the benefits of a healthier environment. A walk down almost any street, a visit to almost any fast-food restaurant, or a peek in almost any blue or black bin (for those fortunate enough to have them) serves as a reminder that we have a long way to go as a city, so we are very supportive of your work to help us move forward.

Thank you,

*Lisa Hart*

Lisa Hart  
Executive Director  
Los Angeles Neighborhood Council Sustainability Alliance  
[lisahart@ncsa.la](mailto:lisahart@ncsa.la)  
323.660.2780 (cell)  
[ncsa.la](http://ncsa.la)