

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 31, 2022

TO: Honorable Paul Koretz, Chair
Honorable Marqueece Harris-Dawson, Member
Honorable Mike Bonin, Member
Personnel, Audits, and Animal Welfare Committee

FROM: Barbara Romero, Director and General Manager
LA Sanitation and Environment (LASAN)



**SUBJECT: RESPONSE TO INSTRUCTIONS OF COUNCIL FILE NO. 21-0372,
ILLEGAL DUMPING IN THE PUBLIC RIGHT-OF-WAY**

On August 25, 2021, the City Council approved a Personnel, Audits, and Animal Welfare Committee (Committee) report instructing the Bureau of Sanitation (LASAN) to report on several items relating to illegal dumping in the public right-of-way based on recommendations included in the City Controller’s report, “Piling Up: Addressing L.A.’s Illegal Dumping Problem”. The Committee report instructed:

1. LASAN, Bureau of Street Services (BOSS), Los Angeles Police Department, and Department of Recreation and Parks to reconvene the previously formed interdepartmental illegal dumping working group.
2. LASAN, with the assistance of the City Administrative Officer (CAO) as needed, to report in 60 days in regard to:
 - a. The number of existing vacancies within LASAN’s Watershed Protection, Livability Services and RecycLA divisions, as well as the number of permanent, dedicated illegal dumping crews, including a camera crew, required to meet demand for services and enforcement
 - b. The creation of a dedicated sworn public officer classification for Environmental Compliance Officer positions to improve recruitment and retention
 - c. The feasibility of purchasing, installing and maintaining 60 additional illegal dumping cameras in order to more effectively investigate and enforce illegal dumping incidents in the City of Los Angeles
3. LASAN, with the assistance of the City Attorney as needed, to report in 60 days with an analysis of existing fees to ensure cost recovery for commercial facility inspection services, as well as fine levels to ensure a sufficient deterrence for illegal dumping activity

In addition, three motions (De Leon - O'Farrell) regarding illegal dumping were introduced in February 2022 that LASAN will be reporting back on separately. (Council Files #22-0116, #22-0118, and #22-0121)

RECOMMENDATIONS

- A. APPROVE the following 36 resolution authority positions for the support of the Illegal Dumping Service program, with 9-months of funding, subject to position allocation by the Personnel Department and pay grade determination by the Office of the City Administrative Officer, Employee Relations Division, and authorize LASAN and the Personnel Department to initiate the hiring process effective immediately. Authorize the following positions to be employed by LASAN for support to keep City sidewalks and other public areas safe, clean, sanitary, and accessible, removing abandoned waste from the public right-of-way.

The 36 requested positions include the following at 9 months funding:

- (1) Solid Resources Manager I (4126-1)
 - (1) Solid Resources Superintendent (4102)
 - (1) Refuse Collection Supervisor (4101)
 - (1) Sr. Environmental Compliance Inspector (4293)
 - (9) Refuse Collection Truck Operators (3580-2)
 - (10) Environmental Compliance Inspectors (4292)
 - (9) Maintenance Laborers (3112)
 - (2) Administrative Clerk (1223)
 - (1) Service Coordinator (0883)
 - (1) Geographic Information Specialist (7213)
- B. The Council, subject to the approval of the Mayor, Appropriate \$2,877,866 from the General Fund (Fund 100), to LA Sanitation & Environment Fund No, 100/82, various accounts to be used to provide the recommended services as follows:
- a. \$2,297,246 to APPR Unit 001010, Salaries General.
 - b. \$10,602 to APPR Unit 003040, Contractual Services.
 - c. \$570,038 to APPR Unit 006020, Operating Supplies.
- C. Reconvene the interdepartmental Illegal Dumping Working Group and refer to this group the following matters:
- a. Creation of an Illegal Dumping Camera Program
 - b. Fines or other penalties sufficient to deter illegal dumping activity

- D. Direct LASAN to work with the CAO Employee Relations Division and the Personnel Department to determine the appropriate classification/s and paygrades for staff engaged in Illegal Dumping Enforcement

- E. AUTHORIZE the CAO and LASAN to make technical corrections as necessary to these transactions included in this report to implement Mayor and Council intentions.

BACKGROUND

On May 19, 2021, your committee considered a March 24, 2021 Controller report relative to illegal dumping in the public right-of-way (PROW). The Controller concluded that “the health and environmental well-being of a city can be measured by the presence of trash and debris in public places.” As illegal dumping has increased in recent years, the requests for LASAN services have proportionally increased, requiring the City to increase resources into PROW cleanup efforts. LASAN addresses illegal dumping from three perspectives: eradicating the blight, educating the public, and lastly, establishing enforcement through progressive measures.

The Los Angeles Administrative Code defines “illegal dumping means depositing or causing to be deposited any combustible or noncombustible rubbish or any refuse of any kind whatsoever upon or in any street, or upon any private premises in this City, or in the Los Angeles River, or in the bed of the River.

LASAN is responsible for cleaning up solid waste and abandoned items that are illegally dumped in the PROW. This department also serves as the lead agency for homeless encampment cleanups, and services approximately 5,150 public street receptacles.

LASAN is also responsible for investigating illegal dumping cases, and the implementation of a citywide stormwater pollution abatement program that includes enforcement of illegal dumping and pollution runoff control laws, inspection at businesses and facilities posing a stormwater pollution runoff risk, and responding to hazardous materials emergencies.

LASAN is additionally charged with monitoring select areas of downtown to ensure appropriate residents and business owners comply with the City ordinance by subscribing to adequate recycLA service. In the course of ensuring compliance, recycLA inspectors also identify and report illegal dumping.

In 2021, LASAN responded to 29,828 Illegal Dumping Service Requests and collected 15,203 tons of solid waste, and on average responded within five days of the initial request. While an

improvement, this is still a considerable amount of time to leave unpleasant and possibly dangerous waste in the PROW.

Existing Resources

The following table depicts the number of existing vacancies within the relevant LASAN divisions. Currently none of the teams have a dedicated camera crew.

Table 1. LASAN Illegal Dumping Position Vacancies in Selected Divisions

Division	Vacancies/Authorized Positions (Illegal Dumping Activities Only)
Watershed Protection	12/30
Livability Services	0/18
RecycLA	13/47*

**Positions do not remediate illegal dumping, but work to provide information to prevent it, as well as report incidents to the appropriate LASAN personnel.*

Since lifting of the city hiring freeze in July of 2021, LASAN has been challenged in bringing on new staff and making headway against attrition and retirements. New emphasis has been placed on prioritizing the filling of vacancies and working with the Personnel Department to expedite hiring.

LASAN is also collaborating with the Personnel Department and CAO to improve recruitment and retention in the ECI classification. In addition, challenges have been experienced in recruiting ECIs to fill vacancies. For example, the time frame to cert a new ECI list is not conducive to current growth in the ECI classification, and cert lists are often exhausted before all ECI vacancies are filled. A possible solution could be providing continuous testing for this classification. Challenges also exist in hiring for alternate shifts and in filling ECI positions associated with encampment clean-ups.

Reinstitution of Interdepartmental Illegal Dumping Working Group

LASAN's Environmental Quality Programs and Illegal Dumping Collection Programs are designed in such a way as to overlap and provide all-inclusive services to the City. All components are designed to address and remove health hazards and/or safety hazards, and solid waste from the PROW. In efforts to better eradicate illegal dumping, the focus must be on better coordination across departments, public education, assigning additional resources including staffing, and establishment of enforcement fines and penalties for both businesses and residents.

These efforts require extensive coordination between both LASAN programs and multiple other City of LA departments. As instructed by your committee, LASAN, along with Bureau of Street Services (BOSS), Los Angeles Police Department, and Department of Recreation and Parks are working to reconvene the previously formed interdepartmental illegal dumping working group. Other member departments of the working group include the Department of Water and Power, the Department of Building and Safety, and the City Attorney's Office. Additionally, because of this committee's instruction to investigate the addition of cameras to curtail illegal dumping activity, the Bureau of Street Lighting (BSL) should be enlisted to participate in the working group as they are in the process of obtaining smart cameras to be deployed on their light poles throughout the City. LASAN has initiated preliminary discussions with BSL on a possible collaboration.

ERADICATION

Dedicated Illegal Dumping Service Teams

Illegal Dumping (ID) servicing, deemed a priority operation, provided the opportunity to reorganize and deploy for the first time, nine (9) stand-alone Illegal Dumping collection teams. These dedicated teams, separate from the CARE/CARE+ operations, allowed for a more efficient routing and deployment to address illegal dumping throughout the City. The nine (9) Illegal Dumping service teams are able to service and close out most open and pending services each week, providing a far more efficient deployment of resources.

These 2-person teams are dedicated to the collection of abandoned waste, and debris citywide. These ID service teams are made up of one (1) Refuse Collection Truck Operator (RCTO) and one (1) Maintenance Laborer (ML). These ID service teams operate 7-days a week on an overtime basis to address citywide service requests (SRs), chronic service needs areas, and are proactive in servicing unreported illegal dumping during operations. The current staffing priority has ensured that the ID service teams are fully staffed.

Although proactive work has proven effective with the utilization of overtime on the weekends, we are recommending additional personnel to ensure an adequate deployment of resources to address illegal dumping both proactively and reactively. The addition of key personnel, along with administrative and supervisory support will streamline services, investigations and collections, reducing the current inefficient referral process to multiple intradepartmental divisions. It will also allow LASAN to implement a staggered weekly shift schedule from Tuesday through Saturday and Sunday through Thursday to ensure a full 7 days/week service.

LASAN has been developing an Illegal Dumping service model that will allow for servicing of locations while also providing the necessary staffing to conduct an investigation into material that

has been abandoned illegally. This can only be achieved through adequate staffing of the appropriate classifications to conduct these investigations at the point of service fulfillment. This model achieves the ultimate goal of reducing time to collect material from public areas.

The requested 36 positions include the following 9 months funding:

- A. One (1) Solid Resources Manager I (4126-1)
- B. One (1) Solid Resources Superintendent (4102)
- C. One (1) Refuse Collection Supervisor (4101)
- D. One (1) Sr. Environmental Compliance Inspector (4293)
- E. Nine (9) Refuse Collection Truck Operators (3580-2)
- F. Ten (10) Environmental Compliance Inspectors (4292)
- G. Nine (9) Maintenance Laborers (3112)
- F. Two (2) Administrative Clerk (1223)
- G. One (1) Service Coordinator (0883)
- H. One (1) Geographic Information Specialist (7213)

The approval of these permanent dedicated illegal dumping staff provide the following benefits to meet the demands of services by:

- A. Creates nine (9) additional service teams, bringing the citywide total to 18.
 - a. These (9) teams will work an altered swing shift (3:00 pm - 11:30 pm).
 - b. Allows for both proactive and reactive servicing.
 - c. Provides the resources necessary to conduct surveys and investigations and compile detailed information and evidence for referral to the City Attorney's office concurrent with collections activities.
 - d. Optimizes logistical support while reducing costs on overtime and fleet expenditures.
 - e. Assist with the identification, documentation, and forwarding of any hazardous materials for special collection, as needed.
- B. Adds ten (10) Environmental Compliance Inspectors (ECI) assigned to service teams working in chronic dumping areas.
 - a. Provides resources necessary to conduct surveys and investigations to compile detailed information and do evidence gathering concurrent with collections activities.
 - b. Assists with the identification, documentation, and forwarding of any hazardous materials for special collection, as needed.

All investigations carried out by these newly formed teams will be referred to the City Attorney's Office for follow-up, and possible prosecution.

Other Partnerships

LASAN is also looking into partnership opportunities, including with the California Department of Transportation (Caltrans) District Seven. The Clean California Initiative (CCI), a statewide program, provides funding for the revitalization of California's streets and public spaces through litter abatement and local beautification projects. Partnering with the State and Caltrans District Seven is an opportunity to beautify public spaces in our communities and to make our streets and sidewalks safer for all. The City is in the process of entering into a Clean California Maintenance Agreement with Caltrans, including the application for an encroachment permit that will allow LASAN to provide maintenance services to specified Caltrans properties and rights of way, on a reimbursement basis.

LASAN is also in the process of executing a service agreement with CalTrans to access CCI funding of up to \$200,000 per year for co-branded community clean up events designated as "Dump Days" that are envisioned to commence in July of 2022.

LASAN also coordinates with the Board of Public Works Office of Community Beautification (OCB) which contracts with local community organizations for cleanup services to address litter abatement and illegal dumping across the City.

EDUCATION

LASAN utilizes several educational tools to ensure that businesses and residents are informed of the proper way to dispose of trash and debris.

Social media is an important communication tool. LASAN utilizes five media channels through Facebook, Twitter, Next Door, Linked-In, and Instagram reaching one million residents with weekly posts encouraging reporting of illegally dumped materials through the city's MyLA311 app or LASAN's hotline number. Periodic emails also reach 95,000 customers with outreach of a similar nature. Staff from LASAN's Community Services Group (CSG) regularly attend events throughout the city to spread the message on proper disposal of trash and bulky items, as well as recycling opportunities.

On the commercial side, the LA Industry Program provides education and guidance for Industrial Businesses on the best and safest ways to dispose of industrial waste and promote a circular economy through recycling and reuse.

Clean Up Green Up is another outreach effort to promote pollution prevention and clean communities, centered in Wilmington, Sun Valley/Pacoima and Boyle Heights. The goal of CUGU is to reduce the environmental burden in the participating communities. Businesses are educated and assisted in compliance with regulatory requirements.

The recycLA inspection team acts as ambassadors, educating and assisting commercial and multi-family customers. RecycLA canvassing, and education and outreach to businesses, include topics such as how to request additional as needed service, educating customers on the ability to increase recycling at no additional cost, reminding businesses to source separate and tear down cardboard boxes, and distributing illegal dumping flyers to all businesses within a defined target area.

ENFORCEMENT

Illegal Dumping Cameras

Your committee requested LASAN to report on the feasibility of purchasing, installing and maintaining 60 additional illegal dumping cameras in order to more effectively investigate and enforce illegal dumping incidents in the City of Los Angeles.

Additionally motion CF#22-0121 was introduced in February 2022 directing LASAN to report back on an illegal dumping and enforcement program including a citywide camera program, in coordination with LADWP and the Bureau of Street Lighting and directs LASAN to submit a supplemental budget request for this purpose.

LASAN is in preliminary discussions with the Bureau of Street Lighting regarding synergies with their Smart Cities Initiative and deployment of cameras that can be mounted on city light poles. Utilizing CleanStat indexed data as well as historic Service Request information, LASAN has identified illegal dumping hot spots that would be ideal for deployment of cameras. At this time we recommend that the matter be referred to the Illegal Dumping Working Group for a multi-departmental approach related to camera-based enforcement. We are happy to report back to your committee with updates going forward.

Commercial Facility Inspection Services

Your committee requested LASAN, with the assistance of the City Attorney as needed, to report in 60 days with an analysis of existing fees to ensure cost recovery for commercial facility inspection services, as well as fine levels to ensure a sufficient deterrence for illegal dumping activity. LASAN has begun an analysis of inspection services fees needed for full cost recovery and has also initiated preliminary discussions with the City Attorney's Office pertaining to increased fines for illegal dumping. We will report back as the analysis and discussions progresses.

Thank you for your continued support of LASAN. If you have any questions or would like to discuss any of these items further, please feel free to contact me or Lisa B. Mowery, Chief Financial Officer at (213) 485-2210 or lisa.mowery@lacity.org.

c: Members of the City Council

Andre Herndon, Chief of Staff, Mayor's Office

Mary Hodge, Deputy Chief of Staff and Deputy Mayor of City Services, Mayor's Office
Jeanne Holm, Deputy Mayor of Budget and Innovation, Mayor's Office
Jose "Che" Ramirez, Deputy Mayor for City Homeless Initiatives, Mayor's Office
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