



Building Owners & Managers Association Greater Los Angeles

*Enhancing value in commercial real estate
through advocacy, education and networking.*

Council President Herb Wesson
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

April 23, 2013

RE: Council File 10-1797-S15
Final Implementation Plan for Exclusive
Commercial Solid Waste Franchise System

Dear Councilman Wesson:

On behalf of the Building Owners and Managers Association of Greater L.A. (BOMA/GLA), we would like to express our concern with certain aspects of the proposed Waste Hauling Program. While the goals of reducing waste to landfills, reducing truck trips and increasing recycling are all elements we support, we remain concerned that the proposal does not include the level of specificity necessary to accomplish these goals. Further, through discussions with the Bureau of Sanitation staff and industry stakeholders, it is clear that waste streams from various industries are quite different and mandating a single hauler per district may not provide the best results for all commercial uses.

We are assured by the Bureau of Sanitation staff that many of our concerns will be incorporated into the RFP process. As we have stressed in prior comments, our primary concern is customer service. We appreciate the sections in the report dedicated to customer service standards. We continue to have the following concerns:

- The Downtown district has been selected for service by a small hauler. Office building owners have no problem with a smaller hauler as long as the City ensures they will provide the broad range of services described in the report.
- In section 3.5 of the report on Consistent Customer Service Standards, we are told customers can schedule collection times that meet their needs "as long as the hauler is also able to efficiently move their vehicles through the city." We understand the environmental benefits of efficiency, but urge staff to work towards a culture of flexibility along with efficiency.

Finally, while we appreciate the inclusion of financial penalties against haulers as a tool for compliance, we hope that the City's oversight of performance is strong and consistent from day one. Specific performance criteria must be set so that it is clear when performance is not acceptable.

We look forward to working closely with the City during the implementation process.

With regards,

Martha Cox-Nitikman
Senior Director
For Public Policy