



GAIL FARBER, CHAIR
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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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October 6, 2016

Ms. Cynthia Harding, Interim Director
Los Angeles County Department of Public Health
313 N. Figueroa Street, Room 806
Los Angeles, CA 90012

Ms. Gail Farber, Director
Los Angeles County Department of Public Works
900 S Fremont Ave
Alhambra, CA 91803

Dear Ms. Harding and Ms. Farber:

BIOSECURITY OF PROCESSED AND UNPROCESSED GREEN WASTE/MATERIAL

Due to the enactment of new State legislation and implementing regulations, the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) has been concerned with the transportation of processed and unprocessed green waste/materials originating from quarantined areas as designated by the California Department of Food and Agriculture (CDFA) and/or the Los Angeles County Agricultural Commissioner/Weights and Measures (Agricultural Commissioner), emphasis added.

In particular, the Task Force is concerned with (1) regulations pertaining to the transportation of these types of green waste, which were recently set forth by the California Department of Resources Recycling and Recovery (CalRecycle) in Title 14 of the California Code of Regulations (CCR), Division 7, Chapter 3.1, including, but not limited to, Section 17852 (a)(21) – “Green Material” and Section 17868.5 – “Green Material and Vegetative Food Material Processing Requirements”; (2) Title 3 of the CCR, Division 4, Chapter 3, Subchapter 4, Article 2: - “General Provisions of Quarantine Regulations” being implemented by the CDFA, and (3) the recently enacted Assembly Bills 1826 and 1594 (2014). Our concern is further augmented with the signing of Senate Bill 1383 by Governor Brown in September of this year establishing a statewide goal to reduce the amount of organic waste disposed through landfilling and incineration by 75% by 2025 (using 2014 as the base year).

The Task Force has been in contact with the CDFA, CalRecycle and the Agricultural Commissioner regarding its concerns during the past several months. The State agencies share these concerns and are working to address the issue at the State level. However, at the local level, the Task Force believes that the aforementioned regulations require coordination between the Los Angeles County Department of Public Health (Public Health), the Los Angeles County Department of Public Works (Public Works), and the Agricultural Commissioner to address elevated hazards associated with pest and pathogen transport.

As your agencies are already aware, the state has established very ambitious goals for managing organic waste through recycling and/or composting pursuant to Assembly Bill (AB) 341 (2011), AB 1594 (2014), AB 1826 (2014) and Senate Bill 1383 (2016). In light of these goals and the statewide efforts by jurisdictions to comply with these mandates by diverting green waste from disposal facilities, the likelihood of movement of green waste out of the quarantined areas has significantly increased. The concern is further augmented by the effects of the recent drought throughout the state that has resulted in an abundance of dead or dying trees in Los Angeles County that need to be cut and further handled. Thus, potential pathogens, particularly in quarantined areas, will have to be appropriately dealt with and, therefore, there is a need to ensure the proper management of green waste to prevent the spread of pathogens that would cause further infestation.

To ensure compliance with Agricultural Commissioner Regulations, the Task Force recommends adding provisions to residential and commercial refuse collection and recycling contracts and franchise agreements. The Task Force also recommends that Public Health consider adding provisions to permits issued to solid waste facilities and waste haulers. In addition, the Task Force strongly encourages the Agricultural Commissioner, Public Health, and Public Works to convene and collaborate to develop procedures and protocols to address this issue and to share this information with other jurisdictions/agencies.

Pursuant to the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended) and Chapter 3.67 of the Los Angeles County Code, the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Ms. Harding and Ms. Farber

October 3, 2016

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The Task Force appreciates your consideration of this critical issue impacting public health as well as the economic well-being of Los Angeles County. The Task Force is available to participate and collaborate with your agencies in this effort. Should you have any questions, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

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Enc.

cc: Each Member of the LA County BOS
LA County CEO
Los Angeles County Agricultural Commissioner/Weight and Measures (Kurt Floren,
Robert Smice, Ed Williams, Ken Pellman)
LA Co DPH (Angelo Bellomo)
LA Co DPW (Dan Lafferty)
Each Member of the Los Angeles County Integrated Waste Management Task Force