



MARK PESTRELLA, PE, CHAIR
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmf.org

June 9, 2021

Ms. Karen Ross, Secretary
California Department of Food and Agriculture (CDFA)
1220 N Street
Sacramento, CA 95814

Dear Ms. Ross:

SENATE BILL 1383 (2016) ORGANIC WASTE DISPOSAL REDUCTION REGULATIONS: POTENTIAL SPREAD OF QUARANTINE PLANT MATERIAL AND OTHER CONCERNS

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to follow up on our previous letter to CDFA dated January 6, 2021, which is enclosed for your reference. In our letter, we raised a number of critical issues regarding the potential spread of quarantine plant material as well as other unintended impacts on public health and safety as a result of improper handling of organic waste. We also requested a response within 90 days but have not received your agency's response to date.

A recent article from the *San Gabriel Valley Tribune* dated May 30, 2021, which describes the significant adverse impacts of transporting homegrown citrus fruit contaminated with the Asian citrus psyllid pest (enclosed), highlights similar concerns.

Given the increased transportation of organic waste that is expected to occur when the Senate Bill 1383 (SB 1383, 2016) organic waste disposal regulations take effect in January 2022, a timely determination of the best way to handle these issues is critical. Local jurisdictions, waste haulers, and facilities, need additional guidance and we eagerly await your response to our concerns.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), 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 and 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

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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.

Considering the fast approaching deadlines mandated by SB 1383 and its implementing regulations, the Task Force respectfully requests that you provide a written response within the next 30 days. Also, we request that a representative from the CDFA attend an upcoming meeting of the Task Force to discuss these concerns. The Task Force meets on the third Thursday of every month and our next meeting will be on June 17, 2021.

If you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



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

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Enc.

cc: California Department of Resources Recycling and Recovery (Rachel Wagoner, Mark de Bie, Matt Henigan, Cara Morgan, Georgianne Turner, Christopher Bria, Marshalle Graham, Gwen Huff, and Ashlee Yee)
Los Angeles County Agricultural Commissioner/Weights & Measures (Kurt Floren, Adrian Zavala, Maximiliano Regis, Erin Zavala)
League of California Cities - Los Angeles Division
Each City Mayor/Manager in the County of Los Angeles
Each City Recycling Coordinator in the County of Los Angeles
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force



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January 6, 2021

Ms. Karen Ross, Secretary
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Dear Ms. Ross:

SENATE BILL 1383 (2016) ORGANIC WASTE DISPOSAL REDUCTION REGULATIONS: POTENTIAL SPREAD OF QUARANTINE PLANT MATERIAL AND OTHER CONCERNS

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to request the California Department of Food and Agriculture's (CDFA) opinion regarding the safety of various methods of handling organic waste pursuant to the Senate Bill 1383 (SB 1383, 2016) implementing regulations, which were recently adopted by the California Department of Resources Recycling and Recovery (CalRecycle) and approved by the Office of Administrative Law on November 3, 2020.

SB 1383 established targets to achieve a 50 percent reduction in the level of the statewide landfill disposal of organic waste (from the 2014 level) by 2020 and a 75 percent reduction by 2025. The SB 1383 implementing regulations require local jurisdictions to (1) provide mandatory organic waste collection services to all residents, businesses, and local government facilities; and (2) recycle organic waste through various methods, such as mulching, composting, "dry" anaerobic digestion, co-digestion at wastewater treatment plants, and biomass conversion. Reducing landfill disposal of organic waste by 75 percent would require over 20 million tons of organic waste per year to be source reduced, recycled, or otherwise diverted from landfill disposal.

The Task Force is concerned that processing significant amounts of organic waste through these various methods could have unintended adverse impacts on public health and environmental safety. Therefore, the Task Force respectfully requests the CDFA's opinion regarding the effectiveness and safety of the above-mentioned methods of managing organic waste in reducing or eliminating potentially harmful bacteria.

The Task Force also recommends that the CDFA in collaboration with CalRecycle jointly address the following concerns which may negatively impact public health and safety and environment:

- Local agricultural commissioners and entities in the chain of custody may not be able to prevent all quarantined plant materials from being transported outside of quarantine zones. Any mulch or compost that contains plant material from quarantined locations/jurisdictions should not be allowed to leave the composting facility location and/or marketed or given away to the agriculture industry, landscapers, local jurisdictions, or any other consumer of compost without proper testing for the presence of harmful constituents or bacteria. The improper transport or land application of quarantined plant material may spread harmful pests or invasive species that adversely impact the natural environment.
- Some of the listed organic waste management processes may not properly reduce the presence of pathogens, such as E. coli. Compost or mulch created from contaminated organic waste may still contain pathogens after the mulching, composting, or digestion process is complete. If contaminated compost or mulch were applied to land used to grow food products, the harvested food could contain pathogens and potentially harm consumers.
- Composting facilities may receive materials that they cannot adequately process. These incompatible materials include certain types of food scraps, such as dairy, meat, animal waste, fats and greasy foods as well as non-compostable materials such as plastics, bioplastics, trash, food packaging containing per- and polyfluoroalkyl substances (PFAS), and coated or contaminated paper and cardboard. If contaminants are not removed from the incoming waste stream or from the final product, harmful materials such as microplastics and PFAS will be land applied along with the finished compost, which may have adverse impacts on the environment such as soil, water, and agriculture.
- Since the SB 1383 implementing regulations require local jurisdictions to procure recovered organic waste products, such as compost and mulch, jurisdictions may utilize more compost and mulch than necessary on parklands, protected open areas, dam basins, etc. Excessive land application of compost and mulch may cause fire and/or could result in unnecessary exposure of the citizens and resident wildlife/pets to possible infection or injury.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), 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

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and 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.

The Task Force respectfully requests that the CDFA take appropriate actions to address these concerns with CalRecycle so that local jurisdictions can implement the SB 1383 regulations without adverse impacts to public and environmental health and safety. Considering the fast approaching deadlines mandated by SB 1383 and its implementing regulations, we would welcome your written response within the next 90 days.

If you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



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

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cc: California Department of Resources Recycling and Recovery (Rachel Wagoner, Mark de Bie, Matt Henigan, Cara Morgan, Georgianne Turner, Christopher Bria, Marshalle Graham, Gwen Huff, and Ashlee Yee)
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Integrated Waste Management Task Force

SAN GABRIEL VALLEY TRIBUNE

Sunday, 05/30/2021

ENVIRONMENT

State warns travelers to leave backyard citrus fruit at home

By Steve Scauzillo

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May 30, 2021

The California citrus industry has a message for road trippers traveling this Memorial Day weekend: Don't give grandma (or anyone else for that matter) your homegrown fruit.

The transport of backyard oranges, lemons, grapefruits and kumquats is illegal in most of Southern California, which is under a citrus fruit and plant quarantine. That's because movement of fruit, citrus trees and even seeds can unknowingly spread a pest that can infect healthy citrus trees with a deadly plant disease that has no cure.

Because homegrown citrus is a place where the Asian citrus psyllid, or ACP, likes to hang out, transporting this hitchhiking pest can allow it to infect other trees with a plant disease it can carry, called Huanglongbing, also known as HLB or citrus greening disease.

Their advice is pack the kids, the shorts, the swim goggles and suntan lotion but not the homegrown fruit.

"Any citrus grown in your yard should not be moved," said Victoria Hornbaker, director of the Citrus Pest and Disease Prevention Division at the California Department of Food and Agriculture. "You can share them locally with neighbors."

By locally, she means within your neighborhood. And if you do share fruit with neighbors, make sure you strip off all the leaves and wash the fruit thoroughly before moving it from your property, to remove any trace of the ACP or leaves infected with HLB.

Violations occur when someone transports citrus fruit or citrus trees across the quarantine, which stretches from just east of Los Angeles into the San Gabriel Valley, southeast Los Angeles County and major portions of Orange, Riverside and San Bernardino counties.

Agriculture and Customs and Border Protection agents will inspect cars and luggage at roadway inspections, Hornbaker said. "People often don't know that they shouldn't do it," she said. "They are not doing it as an intent to be bad."

The pest is one-eighth of an inch long and feeds at a 45-degree angle, making the little insect appear thornlike on leaves and stems.

What happens to the trees it infects? Their leaves can turn yellow; fruit is deformed. Also, excessive amount of fruit dropping to the ground is a sign of a diseased tree, the CDFA said.

HLB has been detected in 2,347 trees statewide. Of those, 20 trees had the disease in San Bernardino County, in yards of residents of Montclair, Ontario, Rancho Cucamonga, San Bernardino and Colton, Hornbaker said.

And 48 infected trees were found in Riverside County, specifically in Corona, Riverside, Eastvale and Moreno Valley.

Once CDFA inspectors determine the tree is infected with HLB after confirmation by a laboratory in Sacramento, they ask the owner if they can remove it. "Ninety-nine percent of the time they say yes," Hornbaker said. That's because the tree will die.

"There is no cure for HLB," she said.

Residents can report pest or disease symptoms to the CDFA Pest Hotline by calling 800-491-1899, or go to californiacitrusthreat.org/ to learn more.

For the past 12 years, the \$3.4 billion commercial citrus industry in California in cooperation with the CDFA has been waging a war against the pest and the plant disease it causes. The effort so far has stopped HLB from showing up in commercial trees, Hornbaker said.

In Florida, the disease has spread throughout the commercial citrus industry, and in Texas, HLB is hitting the commercial citrus industry hard, she said.

"We are in a much better situation than in other states," she said.

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