COUNTY OF LOS ANGELES
Public Health

CYNTHIA A. HARDING, M.P.H.
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

313 North Figueroa Street, Room 708
Los Angeles, California 90012
TEL (213) 240-8156 • FAX (213) 481-2739

BOARD OF SUPERVISORS

Hilda L. Solis
First District

Mark Ridley-Thomas
Second District

Sheila Kuehl
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District

September 9, 2015

TO: Each Supervisor

FROM: Cynthia A. Harding, M.P.H.
Interim Director

SUBJECT: **PROCEDURES FOR REQUIRING SOIL TESTING FOR VALLEY FEVER AS PART OF UTILITY SCALE RENEWABLE ENERGY PROJECTS**

This is in response to Supervisor Antonovich's July 14, 2015 motion requesting that the Department of Public Health (DPH) report back to the Board of Supervisors on procedures for requiring soil testing for Valley Fever as part of utility-scale renewable energy projects.

While the Board has requested procedures for requiring soil testing for organisms that cause Valley Fever, there are unfortunately no scientifically-validated standards for the interpretation or application of the results of these types of tests. Without an application for test results beyond research purposes, testing fails to provide useful information related to construction and other land-use development projects, and any required procedures would be ineffective at preventing exposure to the organisms that cause Valley Fever.

To provide further background, studies have found soil testing is unreliable and impractical for evaluating site conditions, risks, and mitigation procedures for these projects. A study on Valley Fever in California was published in 2012, which found that soil sampling did not effectively predict the presence of the type of spores that cause Valley Fever. Further, it found that even in endemic areas, spores are unevenly distributed, leading to false-negative results. This can potentially impart an inappropriate sense of security. Finally, the assay method used to sample for organisms that cause Valley Fever is expensive, time-consuming, and not available commercially. (JOEM, 54:5, May 2012, 564-570).

Therefore, the Department of Public Health recommends a focus on mitigation procedures, instead of procedures for soil testing for organisms that cause Valley Fever. Valley Fever is endemic to soils in California. It should be presumed that these organisms are present in the soils in these development zones, without the need for soil testing. This presumption can be addressed by site-specific plans for adequate fugitive dust suppression for all new developments according to the rules of the Air Quality Management District (AQMD), in order to meet worker safety standards established by the California Office of Occupational Health and Safety (OSHA). Dust suppression can be accomplished through a variety of methods specified under AQMD rules, such as watering and tarp coverings, to limit the airborne levels of dust to meet OSHA standards. Further information on dust suppression can be found here:
http://www.arb.ca.gov/pm/fugitivedust_large.pdf

If you have any questions or need additional information on this matter, please let me know.

CAH:cr

c: Interim Chief Executive Officer
Interim County Counsel
Acting Executive Officer, Board of Supervisors