



**PUBLIC REQUEST TO ADDRESS  
THE BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS  
HOLLY J. MITCHELL  
LINDSEY P. HORVATH  
JANICE HAHN  
KATHRYN BARGER

**Correspondence Received**

| The following individuals submitted comments on agenda item: |           |               |                    |   |
|--|-----------|---------------|--------------------|---|
| Agenda #   | Relate To | Position      | Comments           |   |
| 89-E.  |           | <b>Favor</b>  | Beth Worrell       | I am required to keep my land clear of weeds. Even unoccupied land cannot have weedcover larger than basketballs or the county will require me to clear it or will clear it for me and bill me. These mulch sites are far more hazardous - they combust just due to water trapped in them, sunshine, and wind - and burn for days. Fighting these fires is a huge use of our limited resources. |
|  |           |               | Hasan Jebory       |   |
|  |           |               | Shante K Vutheikun |   |
|  |           |               | Susan Zahnter      |   |
|  |           |               | Susan Zahnter      |   |
|  |           |               | Talia Wiesel       |   |
|  |           |               | Vv Citizen         | Cameras are needed every Where. Also track vehicles Home Depot's you pay them to pick up and they in turn dump on streets.  |
|  |           |               | Xavier Lo          |   |
|  |           | <b>Oppose</b> | Lalonye Calhoun    |   |
| <b>Item Total</b>  |           | <b>9</b>      |                    |   |
| <b>Grand Total</b>   |           |               | <b>9</b>           |   |



Three Points-Liebre Mountain Town Council  
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8 September 2023

SENT VIA EMAIL & US MAIL

Honorable Supervisor Kathryn Barger  
500 West Temple St., Room 869  
Los Angeles, CA 90012  
(213) 974-5555  
[Kathryn@bos.lacounty.gov](mailto:Kathryn@bos.lacounty.gov)

Dear Supervisor Barger,

Subject: Spreading of mulch in the San Andreas Significant Ecological Area # 17, within the Three Points-Liebre Mountain Town Council Area

Three Points-Liebre Mountain Town Council (Town Council), as part of its mission statement, declares its duty to “[m]aintain our rural atmosphere and protect our area, through mounted opposition, from any party intending to damage our environment or lifestyle.” The spreading of mulch or compost (hereafter described as mulch) in great quantities is antithetical to the preservation of not only our local natural environment, but any area designated as a Significant Ecological Area (SEA) in unincorporated Los Angeles County. An overwhelming percentage of our town council area is within not only the San Andreas SEA, but also within a Very High Fire Hazard Zone (VHFHZ). It is of great concern that mulch deposited in areas identified as VHFHZs creates an especially threatening and dangerous situation with regard to difficulties in extinguishing fires, and the possibility of fire spread during wind events common in the Northwestern Antelope Valley. The odors, trash, invasive weed species, invasive and destructive insects and fungi in mulch pose a threat to our natural environment and its resources. Concerning also is the possibility of contaminants allowed in mulch leaching into our groundwater.

The spread of mulch contaminated with non-native invasive plants and insect pest species is especially egregious, since they could spread to not only SEAs, but also active or recovering agricultural lands across the Antelope Valley, protected lands such as the State of California Poppy Reserve, Angeles National Forest, numerous County Sanctuaries, privately held conservation lands, and of course, private properties. Currently, the community of Green Valley is infected with the Gold-Spotted Oak Borer, which has caused the destruction of numerous oak

trees and threatens elimination of the area's 'iconic' oak forest. It is suspected contaminated firewood was transported into Green Valley, but it could easily have been mulch. This spells a significant loss to the massive ecosystem support oaks provide, and is described on the SEA Program's website: "The Oak Tree (*Quercus*) is an iconic tree of the LA County landscape. The Oak tree is a keystone species in a complex ecosystem, providing habitat for 5,000 insects, 80 species of reptiles and amphibians, 100 species of birds, and over 60 mammals!" Our town council area is home to many heritage oaks and impressive oak and pine forests that need protection within the San Andreas SEA. California Department of Food and Agriculture and CalRecycle list the "Polyphagus Shot Hole Borer as a threat (to forests) currently existing across Los Angeles County (<https://cistr.ucr.edu/invasive-species/polyphagous-shot-hole-borer>). The fungus that causes Sudden Oak Death was found in Southern California, an article describes: [sudden oak death jumps quarantine](#) in an East Los Angeles nursery. Should some gardener deposit trimmings of infected plants or trees that find their way into green waste diverted from landfills and spread on lands in our community, the possibility of infection and spread could decimate our forests here.

Uncounted tons of trash-filled mulch has been delivered to our high desert. For years, the Association of Rural Town Councils has fielded complaints from rural residents regarding the delivery of malodorous, trash-filled mulch, made from green waste collected in Los Angeles, and delivered to various locations around the Antelope Valley and mountain communities. Apparently, LA residents use their green waste collection containers as trash bins (against trash collection rules), and the trash makes its way into composting facilities, which do not adequately clean the mulch. Instead, compost contractors pay landowners and residents, per load, for taking trashy mulch, and in turn, sometimes supply workers to provide a very cursory surface cleaning of the mulch onsite, collecting it in bags that are often left on fields to burst open and scatter to neighboring properties. For some reason, the trash that blows from mulch is not considered illegal dumping, so clean-up cannot be enforced by local statutes, unless LA County takes steps to restrict trash-filled mulch on our open lands.

Three Points residents live in a VHFHZ and are most at risk for spontaneous combustion of improperly spread or stored mulch. Fires that start in mulch require lengthy amounts of time and increased resources to put out, which in an area of usual high-wind events can pose real danger of spreading. We have seen mulch fires supposedly put out, only to continue smoldering and start again, requiring additional financial cost to taxpayers for extinguishing fires, which require heavy equipment and firefighters to turn over and water large areas of the material for assuring it is completely doused. A recent fire at 245<sup>th</sup> St. West and Northwest Highway 138 took a week for LA County Fire Department, with numerous personnel, water tenders, and heavy equipment, to extinguish.

The heritage oaks and pine forests protecting our watershed areas and water quality are at increased risk from not only fire, but invasive plant species that choke our waterways, like the Tree of Heaven, Tamarisk, and Arundo. Lost oaks would take actual *centuries* to return to their current population numbers, age, and health. The spreading of malodorous mulch, with

'allowed' contaminants like heavy metals, bacteria, fungi, and trash, could impact our watershed and groundwater quality, especially over time and repeated spreading of dirty, trashy mulch.

Finally, during the review of the Significant Ecological Area Program, many residents of the lakes and valleys communities, like ours, sent comments and letters requesting that agricultural operations not be exempt from SEA review, as was adopted in the Southern LA County SEAs. The Three Points-Liebre Mountain Town Council agreed with California Department of Fish and Wildlife (CDFW), which recommended that: "the County avoid exemption from CEQA as a ministerial action (CEQA guideline 15268); single family homes, agricultural use, and other non-emergency activities within the SEA until it is determined the activities would not have a significant impact on biological resources or potentially result in impacts to waters of the state" (Three Points-Liebre Mountain Town Council Letter, SEA Ordinance Draft 7, 8 July 2017). We would add specifically, impacts in VHFHZ and SEAs. Agriculturally zoned land in the San Andreas SEA should require review for spreading of trash-filled mulch that has a high likelihood of introducing contaminants to our water; producing unmistakable stench; introducing invasive, destructive plants, insect pests and fungi; potential destruction of valuable forests protecting the watershed; and the very real potential to cause fire in our VHFHZ. Our Town Council respectfully requests official review of mulch spreading operations through imposition of a discretionary permit, as recommended by CDFW, in the San Andreas Significant Ecological Area #17, within our council boundaries, to preserve "irreplaceable biological resources" we value so greatly.

Sincerely,



Susan Zahnter  
President

Cc: Fifth District Planning Deputy Anish Saraiya; Antelope Valley Senior Field Deputy Donna Termeer; Antelope Valley Assistant Field Deputy Charles Bostwick

Susan Zahnter

Agenda Item 89-E

I support this motion brought by Supervisor Barger, responding to illegal dumping of mulch containing: glass, plastic, metals, household trash, including feminine products, baby diapers, construction materials and debris.

Mulch also contains residual pesticides, fungicides, invasive plant and insect species that have the potential to affect not only the health of the land it is spread upon, crops produced, but our watershed areas, conservation lands, County Sanctuaries, public lands like the California Poppy Reserve, and our National Forest.

Our Three Points Town Council area includes ten miles along the border of the Angeles Forest. Ninety-nine percent is identified as part of the San Andreas Significant Ecological Area. More than ninety-nine percent is zoned as agricultural land use and unprotected by the SEA Ordinance. The potential for spreading more mulch in our community is great, and the damaging effects are great.

The threat of fire in our Very High Fire Hazard Zone is one of the things we worry most about. The difficulties in extinguishing mulch fires is very concerning, especially when homeowners insurance has increased to the point that many rural residents like me, either can't afford it or have become underinsured and risk economic loss if fire spreads from a mulch fire in high wind areas of the Antelope Valley.

One of the most disturbing ironies is the land where mulch is spread is not cultivated, only used by contractors as a "loophole landfill" to dump trash and contaminated "green" waste, where State law allows it on agriculturally zoned land.

I urge the Board to approve this motion today.