



**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	Name	Comments
16.		<b>Favor</b>	Andria McFerson	There are many beach trash cans that people eat out of, dump feces in and dig cans out of right in front of beach apartments. Those cans need to be moved to other places away from the front doors of local houses and apartments. Even if it is only 100 feet away at least the rats and roaches would have a place to eat that is further than our front doors.
			Carlos Baltazar	
			Dan DeMoss	Please see letter attached.
			Karen Bryan	<p>Please close the loophole that allows a property owner's consent to excuse his own and a hauler's liability for illegal dumping.</p> <p>Please ensure that the County creates stronger deterrents against illegal dumping through adoption and expansion of local ordinances and by supporting new state laws.</p> <p>I fully support Kathryn Barger's request:            "That the Board of Supervisors direct County Counsel, in coordination with the Los Angeles County Fire Department, Department of Public Health, Department of Public Works, and the Department of Regional Planning to develop local ordinances to regulate land application of mulch and other compostable material to include local permitting requirements including, but not limited to:</p> <ol style="list-style-type: none"> <li>1. Requirements for appropriate zoning, maximum duration of storage prior to land application, maximum height of storage piles, frequency and depth of application, and specific requirements for heavy metal concentration, physical contamination (non-organic material), and pathogen density;</li> <li>2. Requirements of property owners to include in their agreement with mulch suppliers a provision that would require the supplier to be responsible for taking back any load that does not meet the land application requirements, such as physical contamination, heavy metal concentration, and pathogen density;</li> <li>3. Requirements for property owners or mulch applicators to maintain a Fire Plan that would include measures to prevent spontaneous combustion, such as routine temperature checks of stockpiled mulch and minimum spacing requirements between mulch stockpiles;</li> <li>4. Amendments to the Los Angeles County Fire Code to:               <ol style="list-style-type: none"> <li>a. Increase fines in the code to provide greater flexibility in enforcement of illegal dumping violations and to recover cleanup costs related to illegal dumping and illegal land application activities;</li> <li>b. Develop a "Contaminated Mulch Ordinance" to prohibit any construction and debris or any other non-organic material to be mixed with mulch and deposited on land; and</li> <li>c. Expand the existing Fire Code Section 326.15 (Illegal Dumping in Hazardous Wildfire Areas) to include new subsections:</li> </ol> </li> </ol>



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			<p>i. Section 326.15.1 (Mulch Permit) to require a permit for mulch piles greater than 12 inches in height, including fire prevention requirements and stipulations for fire suppression cost responsibilities; and</p> <p>ii. Section 326.15.2 (Unpermitted Mulch Fires) to hold property owners financially responsible for fire suppression costs if a fire occurs on a parcel without a mulch permit, with pile depths greater than 12 inches.”</p> <p>I also support Kathryn Barger’s request that, “the Board of Supervisors request the Los Angeles County Sheriff’s Department to report back in writing in 21 days with a proposed procurement and deployment plan for technological solutions, including but not limited to, mobile cameras and license plate readers, to concentrate enforcement resources on known hot spots for illegal dumping and improper land application of mulch and other organic waste. The report should include cost estimates, schedules, and other pertinent information. “</p> <p>In addition to the above, I also support Kathryn Barger’s request that, “the Board of Supervisors direct the Director of Public Works, in coordination with the Director of Regional Planning, to report back in 21 days with strategies to employ technological solutions for the enforcement of illegal dumping, including but not limited to the use of aerial mapping to identify potential sites of illegal dumping in remote and rural communities, as well as the use of Unmanned Aerial Vehicles. The report should include cost estimates, schedules, and other pertinent information.”</p>
		Richard A Turner	<p>The continued dumping of "mulch" which isn't really mulch is a blight on the landscape and an extreme fire danger. This mulch has not only building materials but diapers and intravenous needles that should not be placed in the open. I understand that the reasoning is to stop the land fills from being filled to the brim, but instead they are endangering our health and property . The landowners that are allowing this "mulch" to be dumped on their property don't care if the house down the road gets burned up when the said "mulch" spontaneously combusted. They don't care if a person's health is harmed by the smell or air quality. They are being paid by the County or the State. The mulch is piled 10 to 20 feet high so it's not being used as a crop fertilizer. It is disgusting and the State and County should figure out a different way to "save the planet".</p>
		Sonja Heritage	<p>The dumping of boiler fuel in our neighborhoods has been happening for couple of year s now and it's time to STOP. We have endured the toxic smell of it both when it's dumped, rained on, spread and on fire. Once it catches fire, it spreads the fire quickly in our windy conditions- endangering ourselves, our homes, our animals and our properties. These fires take weeks to be extinguished and the cost for fire crews is astronomical. These fires happen repeatedly at the same locations but no one is fined and nothing changes. The air is Beyond Totic during these fires and many residents , including myself have red, raw eyes, sore throats, chronic coughing and fatigue during and after these fires. Just drive down the 138 around Three Points Rd and see what's happening there. Truckload after truckload are STILL dumping this crap. The piles are 15 fr high surrounding the huge property. Ravens,</p>



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	<p>Hawks,- you name it- are eating this crap. Our property values are dropping. We need your help!!</p>
Susan Zahnter	<p>During my tenure as president of the Three Points-Liebre Mountain Town Council, I submitted this letter, dated 8 September 2023, regarding the application of mulch in our community:</p> <p>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.</p> <p>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 (<a href="http://cfsr.ucr.edu/invasive-species/polyphagous-shot-hole-borer">cfsr.ucr.edu/invasive-species/polyphagous-shot-hole-borer</a>). 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</p>



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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 245th 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



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			<p>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.</p>
	<p>Susan Zahnter</p>		<p>The State of California has authorized the dumping of trash-filled mulch on our agriculturally zoned lands in the Antelope Valley. This amounts to legally dumping trash and green waste in our rural communities. Strangely, but not surprising, the spreading of this “green waste” is not permitted in the South County.</p> <p>This activity amounts to illegal dumping of mulch containing: glass, plastic, metals, household trash, including feminine products, baby diapers, construction materials and debris, but is considered environmentally friendly and requires no environmental review.</p> <p>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, and other public lands like the California Poppy Reserve, and the Western Angeles National Forest.</p> <p>The Three Points area where I live 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 by design. The potential for spreading more mulch in our community is great, and the damaging effects are great. The ordinance must include exclusion of all mulch spreading in SEAs, and on uncultivated land.</p> <p>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. Mulch fires that have occurred produce vile air pollution, affecting nearby residents for days and weeks at a time.</p> <p>One of the most disturbing ironies is the land where mulch is spread rarely is cultivated. Illegal cannabis grows use mulch berms to shield their illicit</p>



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		<p>operations; it is spread over native vegetation for “weed abatement” only to fertilize invasive weed species like non-native grasses, tumbleweeds, black mustard and ragweed; it is spread because land owners get paid for providing a de facto landfill to LA County contractors who deliver the disgusting material. Our lands are being used by the county as a “LOOP HOLE LANDFILL” to fulfill their compliance for SB1383 to dump trash and contaminated “green” waste where State law and the county allow it on agriculturally zoned land.</p> <p>STOP DUMPING ALL TRASH-FILLED MULCH WASTE IN THE ANTELOPE VALLEY AND GREEN-WASHING LA COUNTY’S DE FACTO LANDFILL OPERATIONS ON PRIVATE LANDS.</p>
	Tiffany Lappo	<p>This needs to be stopped it is effecting people's health and community in major ways. It sits for months with waste deteriorating in the piles into our ground water, and our air quality is awful somedays it smells rancid and like death outside due to the decomposition in these pules not to mention the fire hazard and chemicals being used to put those out.</p>
<b>Oppose</b>	Marty Foster	<p>As a 30+ year resident, I am horrified at the amount of boiler fuel, mulch, being deposited on the ground and contaminating our groundwater and the spontaneous combustion fires the produce toxic fumes into the atmosphere for us to breathe. when a spontaneously combusted fire happens, the fire department rolls out and has to handle a situation that never I repeat never should've happened in the first place. I see it is a clear waste of tax dollars because you're allowing this to happen. There seems to be no regulation or enforcement of regulations. When this material is dropped on the ground, it renders the ground useless. And many people just walk away from the property they drop that that boiler fuel mulch on. What in God's name are you people thinking allowing this to happen? Is it just because it's not in your backyard? Let me tell you. I moved out to the country for fresh air and clean living and in the last 20 or so years, it is deteriorated and accelerated deterioration in the last few years by unscrupulous landowners and people trying to make a buck dumping the boiler fuel mulch. Please, I urge a stop to this immediately cease and desist.</p>
<b>Other</b>	Ashley Mroz	
	Beth Worrell	
	Jacqueline Ayer	<p>It is greatly appreciated that this item is on the agenda and that the County is addressing illegal dumping. SORT wants to point out that, in a letter dated August 14, the health department told you that it is not authorized to take any enforcement action against municipal waste haulers who carry the waste they collect from all over the County and then dump it in the desert at illegal, unlicensed, and unpermitted landfills in the Antelope Valley. That is categorically false. As the Local Enforcement Agency for the County, the Health Department has a statutory obligation to enforce section 44000.5 of the Public Resources Code which explicitly prohibits municipal waste haulers from disposing of waste at illegal, unpermitted and unlicensed landfills. SORT requests that this board act independently of, and separately from, the</p>



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				<p>health department by connecting directly with CalRecycle and state legislators to clearly identify and enumerate the Health Department's responsibility to enforce section 44000.5 and then compel the Health Department to immediately and fully meet these enforcement responsibilities. Only the Board has the authority to compel the health department to do its job in enforcing section 44000.5 and we ask that you exercise this authority as quickly as possible.</p>
			<p>Marcy Watton</p>	<p>Why is the dumping of garbage and toxic waste (maliciously misidentified as "mulch") on a vulnerable population in the Antelope Valley being allowed to continue? There are already laws, regulations and ordinances that regulate landfills and garbage dumping. Why is there no enforcement of the existing laws, regulations and ordinances? It is my understanding that the waste haulers have contracts with the County to -properly- dispose of waste processed into mulch that should contain less than .5% contaminants but what is being dumped on literally MULTIPLE SQUARE MILES of land up to 24 FEET DEEP in the Antelope Valley is not processed and is closer to 25% contaminants and toxic waste. Why are these unscrupulous actors not having their contracts voided? Why are they not being cited ...or arrested... for their harmful and illegal activities. The County has known about this problem for many months and yet now Supr. Barger proposes more ordinances with a promise of enforcement including the mandate that a property owner ASK THE ILLEGAL DUMPER to "remove the waste" which now amounts to thousands of acres (possibly hundreds of thousands of acres when the area around Lake Los Angeles is included) of waste! This egregious oversight is affecting the health of the residents, their property values, their groundwater, and will affect the water supply of Los Angeles as the toxic waste leaches into the DWP's groundwater storage banking in the west Antelope Valley. This is a crisis of monumental proportions, a "Hinkley" times a thousand. The supervisors need to issue an injunction to everyone involved in these operations to stop these activities immediately.</p>
			<p>Sharon Rooney</p>	<p>Stronger regulation should be required, this needs to stop for so many reasons. The fire danger alone here in Los Angeles county so close to the mountain communities as well as the population directly in the area. The nuisance is beyond words for those, who live here. My livelihood teaching horseback riding lessons ended because the stench and dust was unbearable. Opening a windows or turning on swamp cooler to keep cool in triple diget weather isn't possible without bringing the stench inside. Looking after animals daily breathing this is disgusting. And the water .. we all have wells... which could be contaminated with run off. Property value is lost as fire insurance increases. Not sure how long 8000 character is there arent enough to write more....</p>
			<p>Sharon Rooney</p>	
			<p>Susan Zahnter</p>	<p>In the name of saving the environment, uncounted tons of contaminated trash-filled mulch has been dumped here in the Antelope Valley, diverted from landfills where it should be placed. Uncounted tons of burning mulch</p>

			<p>has threatened the property, health and lives of rural residents, making living near dumpsites unbearable. If SB 1383 legalized dumping continues, uncounted tons of contaminated mulch will threaten our watersheds, Significant Ecological Areas, conservation lands, and other environmentally sensitive areas.</p> <p>Private property in the Antelope Valley is exploited and used as a “de facto” landfill, and dumping continues as we speak. The words describing mulch as “green waste” and its deposition on our open spaces is nothing but green-washing a despicable practice that imposes great environmental impacts and subsequent costs on the rural residents of the north county.</p> <p>We are ready for environmental justice and equity. This should include direct participation of residents affected by the spreading of mulch, not just the public outreach box ticked off by departments involved in proposed regulation and ordinance and doing the will of the county.</p> <p>Finally, Public Health’s Environmental Justice statement says “Everyone deserves to live in a clean, healthy environment because the environment around us affects our health,” and “recognizes that the health of a community largely depends on the conditions in which people live, work and play, and (I stress) promotes the fair distribution of environmental benefits and burdens.” I say prove it—by suspending mulch spreading in the Antelope Valley until solutions are found, protecting rural residents from exposure to contaminated mulch and mulch fires, and protecting environmentally sensitive and watershed areas crucial to preservation of our rural environment.</p>
		Tanya De Voe	
		<b>Item Total</b>	<b>18</b>
<b>Grand Total</b>			<b>18</b>



October 7, 2024

Supervisor Barger  
Los Angeles County – 5<sup>th</sup> District  
500 W. Temple Street, Rm 869  
Los Angeles, CA 90012

I am writing this in my capacity as the General Manager of West Valley County Water District (WVCWD). The district is a public agency that serves 247 households with approximately 800-1000 people in the surrounding community. Several weeks ago, I wrote to you about the mulch dumping being done in the area. The district appreciates the efforts of your office to move forward new policy to rectify the current problem and the efforts to put in place best management practices and monitoring of the mulch dumping.

The obvious issues with air quality, public health, and quality of life for those in the area are being reviewed and hopefully effectively addressed to mitigate the current issues created by the dumping and we hope to see enhanced monitoring and testing of the constituents in the mulch before transporting and dumping of the mulch along with enhanced monitoring and regulatory oversight of the dump sites in the area.

Fire concerns are paramount, but one long term concern that we as a district have, that I have not seen addressed to this point, is the potential contaminants leaching down into the aquifer. I do not know if the mulch is subject to testing for heavy metals, PFAS or PFOS (forever contaminants), coliform bacteria, etc. Given the porous nature of the soil in our area (sand) and the unknowns of the mulch this is a very valid concern and needs to be addressed in the discussions about the mitigation process this week. Enhanced monitoring of the mulch quality that specifically addresses the concerns of leaching contaminants in tandem with the regulated processes that ensure chain of custody and sampling requirements will provide both accountability as well as indicate potential aquifer contamination and subsequent treatment processes necessary for a public water agency to serve safe potable water.

It seems inconceivable to me that any agency or company could pay a private landowner for the right to apply sludge or mulch at will with no regulatory oversight or monitoring. The parties in question also apparently had no concern for the air quality or quality of life for the surrounding property owners and the folks that live in the immediate area.

Once again, Supervisor Barger we appreciate and thank you for all your staffs' efforts on this issue. I just wanted to bring forward some concerns myself and the board of directors of WVCWD have that may not manifest themselves right away as it does take some time for any potential contaminants to reach the aquifer. It is my hope that we can have a process in place

imminently that will hold those responsible for any contamination accountable and liable for water quality issues resulting from to the land application of the mulch.

Sincerely,



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Dan DeMoss, General Manager  
West Valley County Water District