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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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September 23, 2020

Ms. Fesia Davenport, Acting Chief Executive Officer
Los Angeles County Chief Executive Office
500 West Temple Street, Room 358
Los Angeles, CA, 90012

Dear Ms. Davenport:

RESPONSE TO THE 2019-20 LOS ANGELES COUNTY CIVIL GRAND JURY FINAL REPORT

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) would like to express our concerns on the recommendations made in the 2019-20 Los Angeles County Civil Grand Jury Final Report (Report) titled "A Diet for Landfills: Cutting Down on Food Waste," located on page 11 to the [linked](#) Report.

We are concerned about a recommendation in the Report to promote the development of additional LA Compost sites within the unincorporated areas and/or the 88 cities in Los Angeles County. As indicated in recommendation 1.10 on page 31, "The City of Los Angeles should partner with LA Compost to expand that organization's footprint in the city to increase its capacity to collect and compost food waste." Although this recommendation pertains to the City of Los Angeles, other cities and unincorporated communities may consider implementing similar programs. The Task Force would like to offer the following comments regarding our concerns with this recommendation:

- We are concerned about the duration of time that the food waste and/or compost sits in the LA Compost community hubs. We are concerned that the composting process may not be properly managed to reduce bacterial contamination, such as E. coli. Compost created from contaminated food waste may still contain bacteria after the composting process is complete. If contaminated food waste is applied to land used to grow food, the harvested food may contain bacteria that will in turn harm consumers.
- LA Compost's website states that the community hubs are intended for composting of certain types of food scraps, but without continuous monitoring, the compost bins may be contaminated with unwanted food waste (i.e. dairy, meat, animal waste, fats and greasy foods), non-compostable materials such as bioplastics, and trash.

Contamination in the compost bins may result in a contaminated compost product being land applied, which may have adverse impacts on the environment such as soil, water, and agriculture.

- Community composting hubs may also produce strong odors that affect neighbors. We are concerned that the development of more composting hubs throughout the County will also result in an increase in odor complaints, especially if the community composting hubs are not continuously managed and inspected.
- The California Department of Food and Agriculture (CDFA) may not allow compost to leave the composting facility location (or to be marketed) if it contains bacteria, foreign material such as grit, soil, gravel, metal scraps, building debris, or plant material from trees, plants or fruits that are quarantined in any location or jurisdiction providing material to the composting facility. Contaminated compost maybe dumped on any open acreage, including parklands, protected open areas, dam basins, etc. This disregards the possible exposure of citizens and resident wildlife or pets to possible infection or injury. Therefore, cities and unincorporated areas developing community composting hubs should work closely with CDFA, so that the compost can be utilized and will not have to be disposed due to contamination or quarantine restrictions.
- The most efficient way to handle organic waste on the least amount of acreage is to use one or more of a wide range of alternative non-combustion conversion technologies, such as anaerobic digestion and biomass conversion, which will produce marketable products, such as renewable natural gas, transportation fuel, or electricity. Crowded cities or jurisdictions with limited budgets and limited open land area to process organic waste will be able to manage waste in an environmentally safe, financially feasible manner using these technologies.

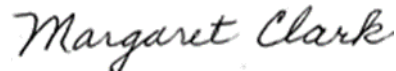
Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in 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 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.

We respectfully request the Chief Executive Office take these concerns into account, when considering implementation of the recommendations in the Civil Grand Jury Final Report.

Ms. Fesia Davenport
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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: Los Angeles County Chief Executive Office (Cheri Thomas)
Los Angeles County Agricultural Commission
California Department of Food and Agriculture (Secretary Karen Ross)
League of California Cities - Los Angeles Division
Each City Mayor and City Manager in Los Angeles County
Each City Recycling Coordinator in Los Angeles County
Each Member of the Los Angeles County Solid Waste Management
Committee/Integrated Waste Management Task Force