

Reading for class:
TIDRC008
Scrap Tire Enforcement

Selections from
Illegal Dumping Enforcement
Officer's Guide
Texas 2026 Edition

Chapter 10:
Local Control of Scrap Tires
(Pages 247 – 265)

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Chapter 10: Local Control of Scrap Tires

Without doubt, scrap tire storage and dumping have created the WORST Public Health Nuisance in Texas. Moreover, it's up to local governments to control them.

Our future doesn't look good as far as scrap tires are concerned.

Scrap tires are about the best waste there is. Listed below are some of things that help make them the Most Outstanding Waste in Texas, now and for the foreseeable future. Hand's down, scrap tires are the Champion of Waste.

Because of the structure of current state administrative rules governing scrap tires, cities should attempt to control them through more stringent local ordinances, a process allowed under state law, as well as greater use of criminal environmental laws.

The following cities (at least) have created local ordinances to control scrap tires: Amarillo, Dallas, El Paso, Forney, Fort Worth, Gainesville, Grand Prairie, Harlingen, Huntsville, Laredo, Madisonville, Mineral Wells, Odessa, Pharr, and San Antonio. If your city is not on this list and you have a scrap tire ordinance, my apologies for having missed you. Send me a copy and I'll add you to the list.

However, if your city doesn't have a scrap tire ordinance yet, we encourage you to make this a priority.

Of course, just having a new ordinance doesn't mean affected parties will follow it. City administrators, police, and code officers will have to make a pointed effort to bring residents and businesses into compliance.

At the county level, THSC Sec. 365.017. REGULATION OF LITTER IN CERTAIN COUNTIES (see more discussion below) allows county commissioners to control and force cleanup of illegally dumped waste on private property in the unincorporated areas. Cleanup is at the expense of property owners of record. This could be used as an alternative to enforcing the criminal sections of THSC Chapter 365 when appropriate. THSC Sec. 365.017 is seldom used. It brings the commissioners court to a decision point: does the court actually want to regulate waste, such as scrap tires, dumped on private property in unincorporated parts of the county? If so, here is a good statute to use; if not, please stop saying *“There is nothing we can do to force cleanup on private property out in the county.”*

Of course, using THSC Sec. 365.017 is in addition to doing general illegal dumping criminal enforcement and applying laws prohibiting Public Health Nuisances and rural Public Nuisances.

The major block in illegal dumping enforcement is cities and counties simply not using existing state anti-pollution criminal laws.

The key to dealing effectively with scrap tires is to respond to the problem as early as possible. Whether you have just a few or many scrap tires, work to resolve the issue quickly. Ignored, piles of scrap tires never decrease; they just grow. The First Iron Law of Waste takes over: “Left un-abated, piles of waste only grow.”

A copy of the relevant sections of the state administrative rule for handling scrap tires, 30 Texas Administrative Code, Sections 328.51 through 328.71, also titled Subchapter F: Management of Used or Scrap Tires, is in the Appendix of this book for your reference.

Texas' "Signature Waste"

Scrap tires will be remembered by future archeologists as Texas' "signature waste." Consider these realities:

1. They create an enormous Public Health Nuisance
2. We don't know how many of them we're making
3. We don't really know who's generating them
4. They are extremely easy to move around and dump
5. There's not much that they can be used for
6. Controlling them is a local government problem
 - a. Using existing criminal laws
 - b. Adopting a Scrap Tire Control ordinance

Granted, tires make rides in cars and trucks smoother, and we're all fans of that. But after we use about 1/8th of an inch off their tread, they can't pass legitimate safety inspections anymore and need to be scrapped.

I've wondered how long it would take for a scrap tire to break down into its elements if it were thrown out in the woods and left alone. I once asked a group of county commissioners in East Texas that question, and I was surprised when one of them shouted out, very sure of his answer, "*Six-hundred years!*" When I asked him how he knew, he responded, in the same loud, sure voice, "*I don't actually have any idea. But I've learned that if I answer a question like that in a loud, self-assured way, I tend to get re-elected.*" Hard to argue with that logic.

Automobile, truck, and tractor tires must be the only item that (1) we use so little of; (2) have such limited reuse; and (3) last so long when we decide they are "waste."

Of course, now (from January 1, 2025) when you no longer must have your non-commercial vehicle safety inspected (HB

3297), no one at all will be checking automobile tires to see if they are safe. Emissions inspections will be required in our seventeen more-heavily populated counties¹, but not state-wide. Maybe the rate of increase of scrap tires will begin to slow then as more bald and damaged tires stay in longer use.

1. Scrap tires create an enormous Public Health Nuisance

Building a life-time home for mosquitoes, rats, and other vermin and scattering them around backyards, on vacant lots, behind buildings, and other places creates a major risk to public health. Even the “legal” piles of up to 500 scrap tires that “Generators” (that’s a defined term in the Administrative Code controlling scrap tires²) can have on their property can easily constitute a Public Health Nuisance.

The provision for keeping mosquitoes under control is found at and is a Generator responsibility:

Section 328.56. Generator Requirements
(d) (4) Tires stored outside shall be monitored for vectors, and appropriate vector control measures shall be utilized at least once every two weeks.

The definition of the word “vector” can be taken from general usage throughout the Health and Safety Code to certainly include mosquitoes and rats. However, requiring Generators to attempt to control mosquitoes *at least* every couple of weeks seems insufficient, especially since there is, of course, no monitoring for actual compliance by the state.

A far better approach is for Texas cities and counties to simp-

¹ Brazoria, Collin, Dallas, Denton, Ellis, El Paso, Fort Bend, Galveston, Harris, Johnson, Kaufman, Montgomery, Parker, Rockwall, Tarrant, Travis, and Williamson.

² 30 TAC SEC. 328 SUBCHAPTER F: MANAGEMENT OF USED OR SCRAP TIRES (i.e., Sec. 328.51-.71) is the complete administrative rule on this waste.

ly enforce the criminal law in THSC Sec. 341.013(c) prohibiting a location anywhere from being a Public Health Nuisance.³

Mosquitoes are far from simply being annoying: they are also very dangerous. The World Health Organization report that malaria alone, usually spread by infected mosquitoes, accounts for over 249 million cases and more than 608,000 deaths every globally every year, mostly in young children. Their report *Vector-borne diseases*⁴ should be required reading for people working outside in Texas, especially as the climate warms.

Mosquitoes are carriers of (at least) West Nile Virus, Dengue Fever, Malaria, Encephalitis, Yellow Fever in humans and heartworm and other diseases in pets. Several of these diseases are common to Texas.

There is a great deal of information about Texas mosquitoes available online from state agencies, schools, and professional associations, including Texas A&M Agrilife Extension (including maps showing ranges for all know species), Texas Mosquito Control Association, Department of State Health Services, and several cities (such as Austin) and counties (including Victoria).

There are around 85 known species of mosquitoes in Texas. Males generally live only a few days; females can live up to six months and lay multiple sets of 100 to 150 eggs during that period. Scrap tires are a favorite habitat. Tires trap water with plenty of rotting leaves for nourishment and are usually within commuting distance for her to access the periodic dab of blood she needs to continue breeding. Scrap tires are great, usually undisturbed place to raise the family.

Scrap tires are also great places for communities of rats,

³ See *Chapter 6: Public Health Nuisance Enforcement (THSC 341)*.

⁴ Vector-borne diseases, *World Health Organization*, September 26, 2024, <<https://tinyurl.com/ehzmeaxh>> [Accessed Sept 18, 2025]

which also may carry several very harmful diseases.

Beyond being perfect Public Health Nuisances, scrap tires can catch on fire fairly easily. The EPA reports that Tire-Derived Fuel, which is essentially what burning scrap tires are, produce the same amount of energy as oil and about 25% more than coal when burned.⁵

Tire fires are notoriously dangerous to fight, hard to totally extinguish, and emit benzene, xylene, ethylene, acetone, and other cancer-causing chemicals.

2. We don't know how many scrap tires we're generating

For the last fifty years we have been telling ourselves nationally that we produce “one scrap tire per person per year.” As best as I can tell, this figure came from a paper issued by the Rubber Manufacturers Association back in the 1970's. I recently heard this “one scrap tire per person per year” number confidently cited by a very experienced enforcement officer earlier this year in a class in Arlington and ran across it in an official report from a city in the Valley. It's a number that is easy to remember, that is cited by lots of officials and is most definitely wrong. It could, in fact, be at least 90% low.

Of the 73-or-so programs being managed by the TCEQ, the Used and Scrap Tire Management program is one of the very best. The folks working in that program are the very best in Austin, to my way of thinking.

Every year, in late spring, they publish their Scrap Tire Annual Report Summary which I also considered “must” reading.

The 2023 report has several valuable charts. The one on Page 4 shows that approximately 57,194,502 scrap tires were

⁵ Tire-Derived Fuel, U.S. Environmental Protection Agency, <https://tinyurl.com/tj55raea>, [Accessed September 18, 2025].

Utilized or Disposed in FY2023. That year Texas had an estimated population of 30,749,924, which calculates to just over

Scrap Tires Generated Per Person			
	Scrap Tires	Population	Tires/Person
2018	45,889,873	28,620,000	1.6
2019	44,785,032	28,990,000	1.5
2020	47,426,269	29,360,000	1.6
2021	50,635,149	29,530,000	1.7
2022	54,136,217	30,029,572	1.8
2023	57,194,502	30,749,924	1.9
<i>TCEQ Scrap Tire Annual Report Summaries, 2018-2023</i>			

1.9 scrap tires generated that year per-person. This movement from 1.0 tires per person-per-year has been a steady process.

Note also that the figures in the above table are derived from required scrap tire reports to the TCEQ. They are the best available anywhere in the state. Not included are the scrap tires generated and illegally dumped somewhere. The actual per-person figure would be higher.

3. We don't really know who's generating them

Anyone with Internet access can read the TCEQ data on individuals and entities who have registered with the agency as being involved in the scrap tire business.

The most important reasons to consult TCEQ data is to find possible sources of piles of scrap tires that suddenly appeared as dumped waste. A more than a few dumped tires most likely originate from some Generator.

A Generator is defined as

30 TAC Sec. 328.53 (8) Generator - An entity, except a scrap tire energy recovery facility and a scrap tire

recycling facility, that is a fleet operator, is an automotive dismantler, or is a whole new or used tire retailer, wholesaler, manufacturer, recapper or retreader.

Once a Generator become large enough to be storing 500 or more scrap tires, it must register with the state and receive a Generator registration number.

Local enforcement officers can begin to build a list of major tire dumping suspects with the Generator data held by the state, which will have to then be supplemented by local knowledge about:

- Is a Generator on the state list still in business?
- Are there other Generators who simply are not yet on the state list?⁶

To view the state information, go to the main page for the *TCEQ Used and Scrap Tire Management* program and look for the section marked “*List of Active Scrap Tire Registrations*” (it’s located about half-way down in the left-hand column). As of September 5, 2025, it contained 12,019⁷ records of persons holding any one of about ten different types of registrations (see details below).

This is the “official” TCEQ list of scrap tire registration holders. There’s not another “hidden” TCEQ list for agency use.

You can download this Excel file of records of current registration holders. If you strip-off the top three header rows, you can sort this large file on the columns, which include the city and

⁶ Generators may stay off the state list by storing fewer than the 500 tires threshold. Some larger entities never register, out of ignorance of the requirement or simply not wanting to come under any scrutiny from the state. 30 TAC 328.56(a).

⁷ A total of 12,048 registrations reflect that some companies are active in multiple areas.

county of where the entity is located. Note the *Facility Type* of the entity in the third column.

There is also an entry in the header information showing the last date the records in the file were updated. On the records I downloaded this evening, September 18, 2025, the update entry on the spreadsheet reads: “*Facility Report Updated 9/5/2025.*” You may want to say, “*But wait! These records haven’t been updated for several weeks. Isn’t there a fresher list?*” This is not a problem.

The records you’re probably most interested in are those with the entry *Generator* in the *Facility Type* column, and most of these haven’t been updated in over 30 years! Current state law requires all the *other* types of facilities to provide annual updates to their records each spring, but not the entities who are identified on the file as being Generators. Thanks to the work of the outstanding staff in this section, the Generator records will begin to be updated beginning in 2025.

If a community finds a few scrap tires that have been dumped, they probably come from individuals. But if it finds piles of ten or twenty or more, most likely that came from a local Generator. So, police and deputies investigating the dumping would like to have a good list of Generators to monitor. It may be that a tire dealer got to the point that he was about to violate the state Administrative Rule on how many scrap tires he is permitted to have on site (*a total of 2,000 scrap tires on the premises, of which up to 500 can be stored on the ground; the balance must be in a lockable trailer that is being loaded for transport to a proper disposal or use site*). The Generator may have used his own staff to dump the tires, or he may have paid an individual a few dollars per tire to haul them away. In any case, knowing who is generating scrap tires seems like important information for a city or county to know.

As of Sept 18, 2025, the “List of Active Scrap Tire Registrations” contained:

Scrap Tire Program Registrations	
Facility Type	Records
Energy Recovery	8
Land Reclamation	17
Processor	169
Recycler	9
Storage	15
Transporter	530
Transportation Facility	1
Generator (Exempt from annual	11,299
Total Records	12,048
<i>List of Active Scrap Tire Registrations 09/05/2025</i>	

In 2019 the staff of the TCEQ Used and Scrap Tire Management program sent a letter to each of the Generators on the file that existed at that point, enquiring as to their status. The results of this mailing were published in their Annual Report for that year:

Registered Scrap Tire Generators

In 2019, the Scrap Tire Program mailed letters to registered scrap tire generators requesting the status of their scrap tire management activities. The responses were:

- *700 registered generators cancelled their registration;*
- *666 registered generators confirmed their business was still active and kept their registration active;*
- *142 registered generators confirmed their business was still active and requested an amendment to update registration information;*
- *Over 3,000 letters were returned; and*
- *Over 7,500 registered generators did not respond.*

The 10,500 letters returned or for which no response was received amounted to over 87% of the registered Generators on the “official” list. For those you’d have to say that their information was at least “suspect.” Note also that the field named *Registration Date* for each Generator record on the TCEQ list is about 30 years old, but the date field for all other Facility Types show the date of the most recent annual update. The bulk of the Generator records were apparently added to this file initially, back in the 1990’s, and never touched since then.

There are several other facts that also support the notion that the Generator information on this list is far from complete:

- Scrap tire Generators are not required to register until they have 500 tires on the ground;
- Active Generators may speak a primary language other than English, be computer illiterate, or otherwise simply be unaware of these TCEQ registration requirements (although the TCEQ web page has a page translation feature);
- Some Generators have simply never heard of the TCEQ;
- Some Generators simply ignore the law, knowing that it is very unlikely that anyone from the TCEQ *Used and Scrap Tire Management* program will ever show up in person to verify their existence.

If a local government needs an accurate list of likely sources of larger piles (over ten or twenty) of dumped tires, it will have to build its own.

4. Scrap tires are extremely easy to move around and dump

Passenger tires weigh just over 20 pounds each and, once the rims are removed, are easy to pick up and move.

You can put a fair number of them in the bed of a pickup truck and move them anywhere you want.

Unless you are one of the few Texas cities who has adopted a local scrap tire ordinance, no police officer is likely to stop you as you drive. Attempts to criminalize large portions of the Administrative Code controlling scrap tires and their movement was vetoed by the Governor's Office a few years ago; currently no criminal law exists concerning tires as such. They are treated as any other solid waste or litter under THSC Chapter 365.

Since Transportation Code Chapter 725 TRANSPORTATION OF LOOSE MATERIALS does not include heavy items such as scrap tires in its definition of "loose materials," loads of scrap tires do not have to be covered before being moved on a public highway.

A specialized environmental enforcement officer *may* charge a person with attempted dumping if he is caught in a common dumping area with a load of scrap tires (provided that the officer is aware that *attempted dumping* is a new possible charge that began September 1, 2023, with the addition of Section 365.012(t) to THSC Chapter 365).

Texas had a formal scrap tire recycling program (1992 to 1997), and a person could be paid 70¢ for each tire ground. The wisdom of the State Legislature (populated by attorneys rather than businesspeople) was that *if Texas produces a large enough pile of ground rubber, someone will come along and invent a use for it*. It turned out that wasn't the case.

The Rubber Manufacturers Association estimates that during the years the "recycling" program was in business, Texas ground over 50 million scrap tires, which would have generated over one billion pounds of ground rubber.

Two things came from the program: (1) massive, unusable, hard-to-move piles of chipped tires, and (2) a lot of criminal fraud cases.

As it turned out, it was far easier just to submit false paperwork claiming to have ground some tires, with an attached invoice requesting payment from the state, than it was to actually collect, grind, and store the resulting tire pieces (for which there was a very limited market). So perhaps slightly fewer than 50,000,000 scrap tires were really “recycled” under that program. I’m not sure how sound the Rubber Manufacturers Association estimate was. They’re the guys that came up with the “one scrap tire per-person per-year” figure too.

The surveillance tapes gathering evidence for these crimes were very boring. Some major companies would do this: Rather than collect *ten* 53’ trailers of scrap tires, why not just collect *one* trailer of tires and roll that one trailer back and forth across the weight scales at the plant entrance ten times? That way the company could produce ten slightly different weight tickets, with different time stamps, to use in its documentation claiming payment from the state. Or, come to think of it, what’s wrong with rolling it back and forth *twenty* times?

The criminal cases were, for the most part, eventually settled by the Texas Attorney General’s Office as civil matters.

Thankfully, the “used tire recycling program” is dead in Texas. Unless needed for a specific purpose, scrap tires are best left in their original form. That makes them easy to simply pick-up, move, and dump, which is bad, but at least we’re not having to figure out what to do with dumped piles of tire pieces all over cities and counties.

I suppose we’ll never know how many tons of ground scrap tires paid for by the state were eventually mixed with dirt and

buried around Texas as *Land Reclamation Project Using Tires*, which started as a program in 1999, just a couple of years after the end of the “recycling” program.

5. There’s not much that scrap tires can be used for

Tires spend about 0.2% of their useful life on cars, and about 99.8% of their natural life as a bothersome waste, or as a fantastic home for mosquitoes, rats, and as a hunting ground for things that eat rats.

This 0.2% guess assumes that a tire may be used on a passenger car for about a year and then take 499 more years to naturally decompose back into the elements that make it up.

Here’s how we currently use a few of them:

- Filling in previously existing big holes (“Land Reclamation Projects Using Tires,” according to the TCEQ). Note that this program began in 1999, two years after the end of the “recycling” program that most likely produced over 1 billion pounds of chipped tires. Maybe this program should be called “BLPST,” for “Burying Little Pieces of Scrap Tires”
- Turning them into crumb rubber and used as “TDF” — Tire Derived Fuel for cement manufacturing and paper pulping operations
- Burning whole tires as fuel. Two failing efforts have been made to do this nationally, but so far too much pollution is produced for this to be yet practical
- Using them to make such things as flooring for stock trailers and stalls; yard furniture; dog beds, painted flowerbeds, rings around trees, and so on

- Using them as padding under playground equipment, padding and fill on artificial athletic fields and tracks, in septic fields, and as weights to hold down tarps
- Using them in road construction, including bank stabilization and mixed with asphalt in road surfaces (80% of rubberized asphalt is in California and (Arizona)
- Shipping a few of them to places like India where they can be “recycled” into the oil, carbon black, and steel of which they are made.

Most of the “uses” cited above (except the last⁸) are temporary. The products manufactured from scrap tires are themselves eventually headed for the landfill too.

Recycling scrap tires into synthetic turf, for instance, only delays the disposal of the used synthetic turf for 8 to 10 years if the use is as a football or soccer field. If installed for lower impact uses, the lifespan is probably double that range. But, like everything “consumed” in America, scrap turf eventually heads to the landfill.

“Acceptable” temporary uses such as artificial turf should be subject to closer analysis. At the time of this writing New York Jets quarterback Aaron Rodgers has sustained a season (and maybe career) ending injury after the first four plays in the Jets’ first game of the 2023/24 season. Quickly identifying this as a “turf-related” injury, NFL Players Association Executive Director Lloyd Howell called for removing artificial turf in all stadiums where NFL games are held and replacing it with “high quality natural grass surfaces.” He points out, *“While we know there is an investment to making this change, there is a bigger cost to*

⁸ See the outstanding YouTube video *The Complete 8-Hour Procedure to Extract Oil from Scrap Tires*, <<https://tinyurl.com/5ym3esm>>.

everyone in our business if we keep losing our best players to unnecessary injuries.”

Should this NFLPA project result in the removal of artificial turf covering from fields where professionals play, it is sure to be repeated for college and even high school levels. Lawsuits will insist that protection of players at these levels is important too.

There’s just not a lot that can be done with scrap tires, and even some of the “good ideas” turn out to be bad when executed.

6. Controlling scrap tires is a local government problem

a. Use existing criminal laws.

There are currently no specific criminal laws available for controlling scrap tires and their illegal dumping. Two things happen when a scrap tire is dumped: (1) the illegal dumping itself creates an unsightly mess, and (2) the mosquitoes, rats, and other disease-carrying vermin create the Public Health Nuisance we’ve come to associate with scrap tires. Control scrap tires using these laws:

- (1) Control the illegal dumping itself with THSC Chapter 365 applied to all dumping of scrap tires on public and private property. Note that Misdemeanor illegal dumping is a strict liability law: no assertion of intent on the part of the violator is required to be proven by the prosecutor.
- (2) Additionally, under the authority granted by the State Legislature and appearing as THSC Section 365.017 (a) *The commissioners court of a county may adopt regulations to control the disposal of litter and the removal of illegally dumped litter from private property in unincorporated areas of that county.* This section, although rarely used for political reasons, could

be used to force the cleanup of a tire dump on private property in unincorporated areas. The commissioners court may *require the record property owners to pay for the cost of removal after the commissioners court has given the record property owner 30 days written notice to remove the illegally dumped litter.*

- (3) Respond to the Public Health Nuisance created by applying THSC Chapter 341, especially THSC Sec. 341.013(c).
- (4) In many parts of unincorporated Texas, THSC Chapter 343 can be applied that deals with the Public Nuisances scrap tires can constitute.
- (5) Inside cities with code enforcement programs to the degree possible, apply “refuge on a lot” type violations to tires violating any of the thirteen Public Nuisance laws.
- (6) If the scrap tires have been dumped into or adjacent to “water” in the state (including the beds and banks of dry watercourses), cities and counties may use the felony and misdemeanor provisions of Texas Water Code Sections 7.145 and 7.147, respectively, to impose criminal penalties on the responsible parties. The penalties are potentially very large. Misdemeanor water pollution under TWC Sec. 7.147 is a strict liability law: no assertion of intent on the part of the violator is required by the prosecutor.
- (7) Burning scrap tires is prohibited under various sections of the Texas Outdoor Burning Rule, the violation of which is a misdemeanor under Texas Water Code Sec. 7.177(a)(5). *Chapter 9 Illegal Outdoor Burning* discusses the problem in misdemeanor outdoor burn-

ing enforcement. (Spoiler alert: The sentencing provisions are contradictory.)

b. Adopt a Scrap Tire Control ordinance.

The Administrative rule used to manage scrap and used tires is found at 30 Texas Administrative Code Secs. 328.51 – 328.71, a copy of which is in the Appendix. Under this rule, municipalities are authorized to develop their own municipal ordinance to control scrap tires, should they desire to do so:

*Section 328.52. Applicability.
This subchapter does not preempt local ordinances regarding the management of used or scrap tires that are as or more stringent than the regulations in this subchapter.*

Probably twenty-five municipalities have used this authorization to develop their own local ordinances controlling scrap tires, the first to do so being the City of Houston. This has been an effective way to control scrap tires inside city limits when using something other than state criminal laws is desired.

Some of the features of Houston's code:

- Better definitions throughout
- No open-to-elements storage of any tire allowed by generators
- Violations of the ordinance are declared to be a criminal nuisance by city (\$250 to \$2,000 fine for each violation)
- Each day can be a separate offense
- Nuisance abatement will be at the owner's expense
- All tires must be secured when unattended (i.e., locked up overnight)

- All tires for sale must be organized and segregated
- Annual Generator and Transporter registration required with the city
- Theft must be reported within 5 days to the registration office, if the theft is reported to the police or not
- Annual Generator Registration is about \$100 per location
- Annual Transporter Registration is about \$200 for the first vehicle; around \$50 for each additional vehicle
- Registration and decals for vehicles are non-transferable
- Only designated and trucks with decals may be used
- Violation: Unregistered transporting over 5 tires on any hauling trip beginning or ending inside city limit
- Violation: Generator using unregistered Transporter
- Stringent recordkeeping and use of manifests required
- Three-year retention of all records – must be kept available for immediate city inspection
- Process defined to revoke Generator and Transporter registrations
- State law used when applicable on offences

Your own ordinance could be even more strict if necessary.

But whatever mix of approaches your city or county decides to use to control scrap tires, your success or failure will be the result of local enforcement efforts, public education, and local political realities.