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SOLID WASTE MANAGEMENT COMMITTEE/  
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April 20, 2023

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**INCONSISTENCIES BETWEEN THE SUBMITTED JOINT TECHNICAL DOCUMENT APPLICATION AND THE REVISED EXHIBIT A-2 OF THE APPROVED CONDITIONAL USE PERMIT 00-194-(5) FOR SUNSHINE CANYON CITY/COUNTY LANDFILL**

It has come to the Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force's (Task Force) attention that on January 31, 2023, the Sunshine Canyon Landfill (Landfill) Operator submitted a Joint Technical Document Amendment Application (Application) to the Sunshine Canyon Landfill Local Enforcement Agency (SCL-LEA) for a Revised Final Grading Plan and Alternative Daily Cover (Enviro Cover). The Operator has since withdrawn the Application and will resubmit at a later date.

However, based on our review of the previously submitted Application, the Task Force has determined that there are numerous significant inconsistencies between the submitted Application and the Exhibit A-2, which was an approved document from the Landfill's Conditional Use Permit 00-194-(5) (CUP), for several reasons:

- The Application proposes final contours for the full build-out of the Landfill that are significantly different and higher than the approved final contours of the Revised Exhibit A-2.
- The Application also requests the usage of Enviro Cover for a 48-hour period during the weekend. This is a direct conflict of Los Angeles County's weekend soil cover requirement from Public Works' letter dated January 15, 2019, which was issued under Condition No. 45.N of the CUP.

As background information, the Landfill received its Solid Waste Facility Permit No. 19-AA-2000 (SWFP) on July 7, 2008. Condition No. 13.f of the SWFP states the following (emphasis added):

*"This permit does not supplant or modify local land use entitlements or local agencies' authority to enforce local entitlements. It is recognized by the EA [Enforcement Agency] that the operator must comply with provision of the integrated Waste Management Act (IWMA), Board regulations and the terms and conditions of this permit as well as other regulatory requirements and applicable local land use measures which govern the operator's activities at the site. If the requirements inadvertently overlap, it is expected that the operator will comply with the more stringent requirement in order to maintain compliance .....*".

The two inconsistencies cited above are in direct conflict with the Landfill's CUP, which is the applicable land use permit which governs the Operator's activities at the site. Consequently, per the SWFP, in order to maintain local compliance, the Operator needs to comply with the more stringent requirements of the CUP.

With the goal of ensuring the health and safety of residents in the communities neighboring the Landfill, the Task Force has been closely monitoring the Landfill's operation and activities to ensure there is no impact to the surrounding communities.

With that objective, the Task Force respectfully requests the Sunshine Canyon Local Enforcement Agency to enforce Condition No. 13.f of the SWFP and require the operator to comply with the local land use permits, namely the Landfill's CUP. Additionally, it is requested that each agency acknowledge all local land use permits when considering future applications. Also, via a copy of this letter, the Task Force respectfully request County and City Regional Planning to investigate this matter and provide a written status update or resolution of this issue to the Task Force.

As background information, the Task Force was formed pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended). 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. The Task Force also addresses issues impacting the system on a Countywide basis including, but not limited to, ensuring

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the conformance of the in-County solid waste disposal facilities with the Los Angeles County Countywide Siting Element.

Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, of the Task Force, at [MikeMohajer@gmail.com](mailto:MikeMohajer@gmail.com) or at (909) 592-1147.

Sincerely,



Margaret Clark  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force  
Council Member, City of Rosemead

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cc: Los Angeles County Department of Regional Planning (Alex Garcia,  
Edgar De La Torre)  
City of Los Angeles Department of City Planning (Tim Fargo, Claudia Rodriguez)  
California Department of Resources Recycling and Recovery (Benjamin Escotto)  
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)  
Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force  
Each Member of the Facility and Plan Review Subcommittee