



LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

GAIL FARBER - CHAIR  
MARGARET CLARK – VICE CHAIR

July 21, 2010

Mr. Edwin Pupka  
Senior Enforcement Manager  
Engineering and Compliance Division  
South Coast Air Quality Management District  
21865 E Copley Drive  
Diamond Bar, CA 91765

Dear Mr. Pupka:

**DRAFT VEGETATION PLANTING PLAN  
SUNSHINE CANYON LANDFILL IN SYLMAR**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) has been monitoring Republic Services, Inc./Browning-Ferris Industries' (Republic) efforts to revegetate the Sunshine Canyon Landfill as well as mitigate odor nuisance from the landfill as required in the Order for Abatement issued by the South Coast Air Quality Management District Hearing Board.

The Task Force would like to offer the following comments on Republic's Draft Vegetation Planting Plan, dated June 1, 2010:

1. Section 3.0 Existing Conditions and Fire Ecology (Page 1)

The draft plan indicates that Figure 1 of Appendix A (enclosed) depicts the existing conditions of the areas located between the Landfill and the residential neighborhood. However, the date of the aerial photo is not included in the draft plan. Based on comments provided by Mr. Wayne Hunter of North Valley Coalition at the Task Force meeting on July 15, 2010, the vegetation in parcel no. 2601006001 had been bulldozed by the owner Mr. William C. Cloyd. We recommend that the most recent aerial photo be used in the final plan, and descriptions of each parcel in the said areas accurately reflect current conditions. In addition, the final plan should also include any proposed vegetation plan, development plan, or change in land use for each parcel.

2. Section 6.0 Plant Sources and Planting Specifications (Page 4)

Bullet 5 indicates that “all plantings should occur between October 1 (or the onset of the rainy season, if later) and April 1 to take advantage of winter rains and moist soil conditions.” However, based on expertise from Task Force member Ms. Betsey Landis, who authored *Southern California Native Plants for School Gardens* and co-authored *Care and Maintenance of Southern California Native Plant Gardens*, the optimal planting period should be from November 1 to March 1 and when the soil temperature does not exceed 70 degrees, above which seeds will be cooked and may fail to germinate. Therefore, we recommend that the final plan be implemented during November 1 to March 1.

3. Table 1 Example Species, Sizes and Spacing for Revegetation (Page 4)

The list of species for revegetation includes Pine, or *Pinus sp.* Please note that Pine trees are highly flammable and is on the County of Los Angeles Fire Department’s list of plants to avoid. We recommend that Pine be removed from Table 1 and that Republic’s consultant ESA refer to the County of Los Angeles Fire Department’s list of restricted plants.

4. Table 1 Example Species, Sizes and Spacing for Revegetation (Page 5)

We recommend adding Deer Lotus or *L. scoparius* in the list of shrubs to be utilized for revegetation.

5. Section 6.0 Plant Sources and Planting Specifications (Page 5)

Bullet 9 indicates that “trees and shrubs will be planted at a depth 1 1/2 times deeper than the depth of the root ball, and have a width twice as wide as that of the root ball to allow for proper growth.” Trees and shrubs cannot be planted at a depth 1 1/2 times deeper than the depth of the root ball, as such depth can kill the trees and shrubs. We believe the intention is that “trees and shrubs will be planted in a hole with a depth 1 1/2 times deeper...” To clarify, we recommend that the final report be revised accordingly.

6. The draft plan does not indicate whether or not Republic plans on revegetating the oil well area shown as a barren grey patch in Figure 1 (enclosed). We believe Republic’s efforts to revegetate the southern berm of the Landfill should include this particular area.

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 with a combined population in excess of ten million. Consistent with these

Mr. Bratton  
July 21, 2010  
Page 3

responsibilities and to ensure a coordinated, 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.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,



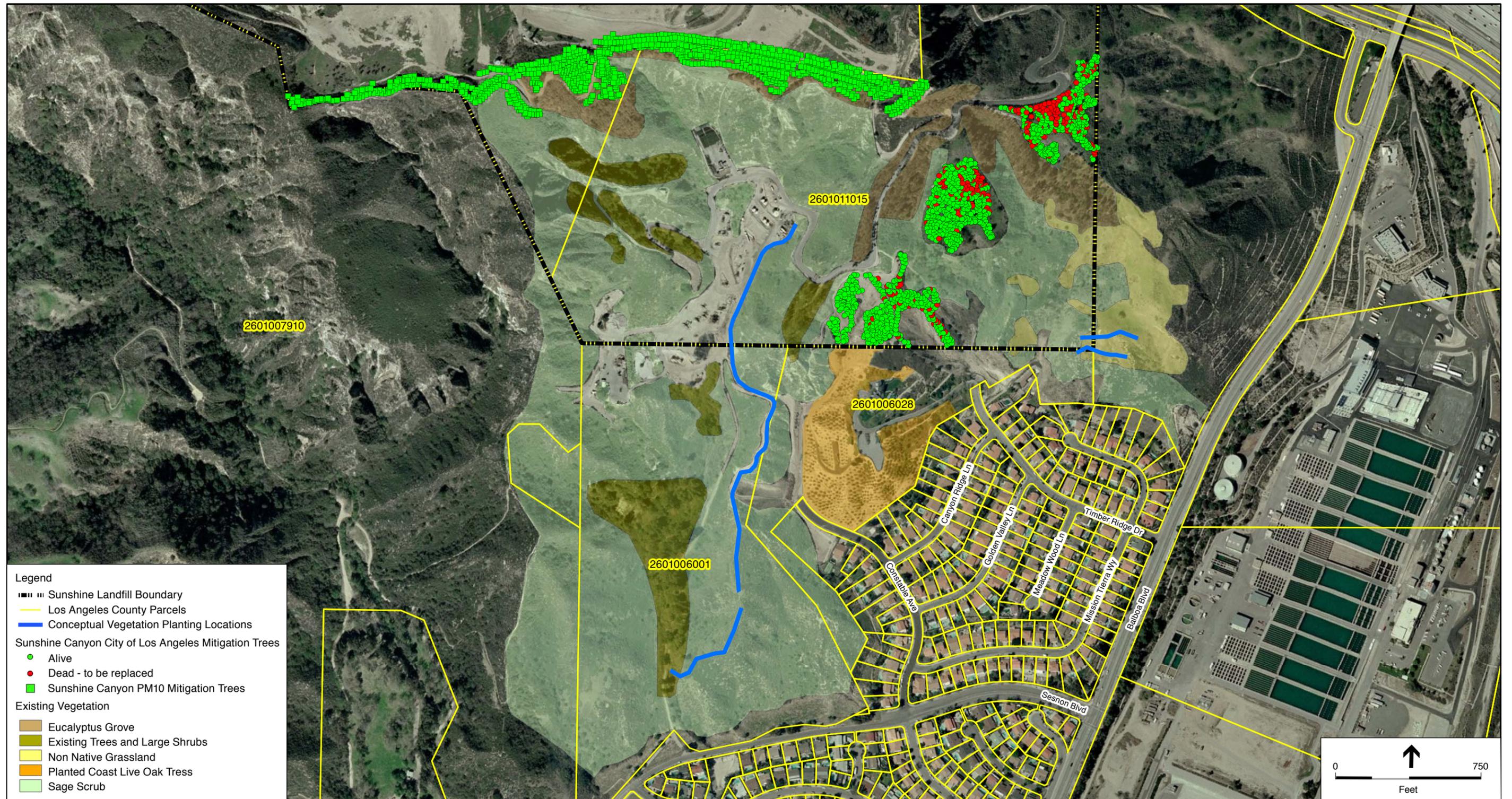
Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste management Task Force and  
Council Member, City of Rosemead

LL:ts

P:\epub\ENGLANTASK FORCE\Letters\SCL Vegetation Planting Plan.doc

Enc.

cc: Republic Services, Inc./Browning-Ferris Industries (Kurt Bratton, Susan Jennings)  
Environmental Science Associates (ESA) (Greg Ainsworth)  
South Coast Air Quality Management District Hearing Board  
South Coast Air Quality Management District (David Jones)  
Sunshine Canyon Landfill Local Enforcement Agency (Cindy Chen)  
Los Angeles County Department of Regional Planning (Richard Bruckner,  
Maria Masis)  
Los Angeles County Department of Public Health (Cindy Chen, Gerry Villalobos)  
Los Angeles County Department of Public Works (Pat Proano)  
City of Los Angeles Department of Planning (Gail Goldberg, Marc Woersching,  
Ly Lam)  
California Department of Resources Recycling and Recovery (Margo Brown,  
Mark Leary, Ted Rauh)  
Sunshine Canyon Landfill Community Advisory Committee (Becky Bendikson)  
North Valley Coalition of Concern Citizens (Wayde Hunter)  
Each Member of the Los Angeles County Integrated Waste  
Management Task Force



SOURCE: ESA, 2010.

Sunshine Canyon Landfill Restoration Plan . 210325

**Figure 1**  
Existing Plant Communities and  
Conceptual Planting Buffer Map