

**North Valley Coalition of Concerned Citizens Inc.,  
16911 San Fernando Mission Blvd.,  
Box 172  
Granada Hills, CA 91344**

February 23, 2025

Dear Supervisors:

The North Valley Coalition previously conveyed in our letters of February 5 and February 16, 2025, that we OPPOSE any approval of Sunshine Canyon Landfill taking Phase 2 fire-related debris. By way of this letter, we also OPPOSE approval of Item 10 on the February 25, 2025, Agenda for taking any Phase 2 fire-related debris to Sunshine Canyon Landfill including an increase in tonnage from 12,100 tpd to 15,000 tpd, and any increase in operating hours in the morning and evening hours which are the peak times for transmission of odors and dust to the community of Granada Hills and Sylmar.

Suzanne Paulson, a professor at the University of California, Los Angeles, and an expert on air pollution, said that *the smoke plume from the fires included “astonishingly high” levels of heavy metals and other toxic ingredients — all of which were present in the ash that covered the burn sites. Those particles also stick to debris and become more dangerous as people begin to sift through materials and move things around*, she said. Los Angeles County has banned the use of leaf blowers in the wildfire areas. *“When that material is disturbed, there is potential for it to become airborne,”* Dr. Paulson said. (excerpt New York Times, Published Feb. 3, 2025, Updated Feb. 4, 2025)

Supervisor Horvath has stated that it is all a State thing, and that the BOS does not have input except for tonnage and hours. The BOS could indeed oppose the use of Sunshine Canyon Landfill given that it is a Public Nuisance, located in a wind tunnel of the Newhall-Saugus Pass which will risk the health, safety and welfare of the communities of Granada Hills and Sylmar, when it is dumped, graded, compacted and interred, something that the Water Board in its Order WQ 2020-00040-DWQ, General Waste Discharge Requirements for Disaster-related Wastes did not anticipate nor address. If

the Board of Supervisors has no input or your approval is not needed, then why is it even on the Agenda?

Apparently, the County of Los Angeles thinks that the residents that live around the landfill just fell off the turnip truck. The two town halls conducted received nothing but poor reviews, with residents complaining that their written questions were not answered and/or that answers given by the landfill owners, the Army Corps, and County Public Works were evasive and in some cases plainly wrong. Further, that the community was unable to subsequently challenge the veracity of the statements made. The absence of a representative from the AQMD led the residents to rightly believe that they were lambs being led to the slaughter, and that the County was merely going through the motions.

- **Ask yourself why is it** that the State Water Resources Control Board in its Order WQ 2020-00040-DWQ, General Waste Discharge Requirements for Disaster-related Wastes requires **that a Class III Landfill must have a composite liner and a leachate collection system,** if the Phase 2 debris that you are now trying to pass off on us really is inert. It is not. the RWQCB knows it and so do you. It is hazardous.
- **Ask the Water Board** if it is just trying to stave off the inevitable contamination of groundwater by having it placed in a Class III landfill with a composite liner and a leachate collection system in order to disguise the fact that it is kicking the can down the road so that when that landfill leaks and contaminates the ground water (and it surely will as all liners leak. At best, a single liner will give you 25 years of protection, and a double composite liner 50 years), which by that time most of us will either be senile or dead and we won't be able to hold anybody accountable, and all the people would hear at that time from the politicians is "if had we only known". For the record, now you do know. In the case of Sunshine Canyon, it is underlain by vast amounts of water according to the NVC's geologist, and while not potable, they are never the less the waters of the State and must be protected.



Believing that 384,000+ tons of fire-related potentially hazardous waste will be contained in perpetuity is not reasonable even for them.

- **Ask the US Army Corp** if this stuff is so inert, can you spread this stuff in your back yard. They will say no.
- **Ask the US Army Corp** why they can't just dig a hole in the Pacific Palisades and bury this waste where it was generated. They will say no they can't. Ask them why if there is room, and then why not?

**Ask yourself** why is Sunshine Canyon even being considered? Does the County when it seeks and evaluates contractors not also look to the past history of compliance with the agencies that oversee its operations? If you personally purchase something online do you not review the "likes and dislikes or stars" to decide whether or not the vendor is reliable? As the largest landfill that already bears a disproportionate amount of the City and County waste stream, it has the worst record for odor violations (before 5 months Chiquita Canyon hydrogen sulfide problem), and it was 2-1/2 times worse than the other 15 landfills combined within the 10,750 square miles that the SCAQMD administers to. **Do you believe** that this is the best place to send it given the number of odor complaints and NOV's this landfill has received or the fact that the prevailing winds can also carry contaminated soot, dust, and soil from the disposal of even burrito-wrapped fire-contaminated potentially hazardous waste as it is moved, graded and rolled on by compactors with teeth which will expose the debris to wind tunnel that is the Newhall-Saugus Pass to further impact the health, safety and welfare of the communities of Granada Hills and Sylmar.

**Ask the landfill** what is the most important thing to them? It is the airspace utilization factor, or AUF. The waste compaction rate is how landfills keep score. The compactor(s) they use are important. So, too, are the specifics of the wheels and teeth. There is a reason landfills spend a million dollars a pop for a landfill compactor. Obviously, it is to enable the operator to achieve the highest possible density and conserve your biggest asset: airspace. Do you think they are going to dump 384,000 tons of debris and not compact it, and in so doing break open the burrito-wrapped debris.... think again.

- It is obvious that the Board of Supervisors, County Public Works, and the SCL-LEA has made a mistake. **WQ 2020-0004-DWQ says under Findings, page 3, Item 13 that:** *“This general order does not supersede any federal, state , or local law or regulation Other requirements may apply to this material: this General Order does not require any entity to accept disaster-related debris”.* **Under A. Prohibitions, page 7, Item 3. it states that:** *“Disaster-related waste management operations that create, or contribute to, a condition of pollution or nuisance are prohibited.”* **California Code of Regulations, Title 27 § 20230 - SWRCB-Inert Waste. (C15: Section 2524) states:** *(a) Defined-Inert waste is that subset of solid waste that does not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives, and does not contain significant quantities of decomposable waste. (b) Units That Accept--Inert wastes do not need to be discharged at classified Units. (c) WDRs Optional--The RWQCB can prescribe individual or general WDRs for discharges of inert wastes. Cal. Code Regs. Tit. 27, § 20230 1. New section filed 6-18-97; operative 7-18-97 (Register 97, No. 25). Note: Authority cited: Section 1058, Water Code. Reference: Section 13172, Water Code; and Section 43103, Public Resources Code. 1. New section filed 6-18-97; operative 7-18-97 (Register 97, No. 25).*
- **Ask the US Army Corps** why won't they certify that the entire load is non-hazardous. It is it because they can't. They don't have the tests available to check for all the potential contaminants, and even if they could, it would take too long and be too expensive. They are also removing 6-inches of dirt from the property around the foundation that they cannot hope to test for, soil that could be contaminated by any number of things... oil, asbestos, pesticides, et cetera. The following is a story from the LA Times, February 15, 2025.



# FEMA doubles down on its decision to not test soil as part of wildfire cleanup

In the face of mounting backlash from wildfire survivors and California elected officials, federal disaster agencies are defending their decision to forgo soil testing after cleanup crews remove debris from properties that burned in the Los Angeles County fires.

The Federal Emergency Management Agency and U.S. Army Corps of Engineers have said that federal cleanup workers will remove toxic wildfire ash and rubble, along with a 6-inch layer of topsoil from properties. But, this week, federal officials told The Times [they won't order soil testing](#) to confirm that properties aren't still contaminated after the removal.

Follow-up soil testing — conducted after every major wildfire in California since 2007 — is intended to ensure that properties are remediated to state standards and don't still contain [dangerous levels of toxic substances](#).

But now FEMA, the agency responsible for allocating funding and outlining cleanup procedures in the aftermath of wildfires, says that scraping 6 inches of topsoil from each property is sufficient to protect public health.

By [Tony Briscoe](#) Staff Writer

Feb. 15, 2025 3 AM PT

<https://www.latimes.com/environment/story/2025-02-15/fema-defends-fire-cleanup-strategy-soil-testing-backlash#:~:text=Federal%20officials%20are%20standing%20by,survivors%20and%20California%20elected%20officials>

## **What could be found in that untested 6" of soil?**

**Human pathogens** - the more robust the soil is, the greater the diversity of microbes living in it—including some that may cause infections and illnesses in humans. After flooding or a sewer leak, the wrong kinds of bacteria can make their way into the garden, organisms like salmonella, E. coli, Listeria, and others.

**Creosote** – It is a diverse mixture of synthetic or naturally occurring chemicals known as polycyclic aromatic hydrocarbons, or PAHs. The thick oily substance may form naturally after a wildfire or as a residue on chimney flues, and



another form is manufactured from coal tar for use as an industrial wood preservative and pesticide.

**Arsenic** - It's given off by coal, wood, and waste when they burn. Homes built on former orchards or downwind of power plants may sit on land impacted by arsenic buildup. Long-term, low-level exposure to arsenic has been linked to

**Asbestos** - It occurs naturally in mineral form, was once a staple material used in building and household products. It was strong, resisted corrosion, insulated extremely well, and did not burn. Unfortunately, asbestos is highly carcinogenic as well. Nowadays, asbestos pollution is closely linked to old industrial facilities, improper waste disposal procedures, and to some extent, demolition sites. Even at concentrations below 1 percent it can be problematic

**Petroleum Products** - Leaks, accidents, or spills may lead to petroleum contamination in soil.

We spoke to you previously of the NVC's record of lawsuits with both the City and the County over Sunshine Canyon Landfill, noting that there have been two additional lawsuits by community members against the landfill with a third lawsuit filed September 2024 by Sylmar involving 1450+ persons. The suit, filed by trial law firms [McNicholas & McNicholas, LLP](#), [Frank Sims & Stolper LLP](#), and [Becker Law Group](#), alleges the operator failed to properly maintain its landfill following heavy rains.

<https://sanfernandosun.com/2024/09/11/sylmar-residents-file-lawsuit-against-sunshine-canyon-landfill-due-to-toxic-fumes/>

Of course, the motion by Councilman John Lee, District 12 and cosigned by Councilwoman Monica Rodriguez, District 7 to ask the City Attorney to file a Temporary Restraining Order was approved.

To approve, this motion before you (see notes Item 10) by ignoring the issues we have raised is unconscionable as we have suffered great harm, as the largest landfill in the County of Los Angeles. If you approve the motion before you, it will place an undue burden on the communities of Granada Hills and Sylmar (a minority community), a burden not placed on others. There are measurable environmental and public health results in Granada Hills and Sylmar communities that are disproportionately burdened by environmental

harms and risks. To that end, even the EPA strives to ensure that no population should bear a disproportionate burden from the negative environmental consequences resulting from industrial, governmental and commercial operations or policies. County Public Health has consistently refused to address requests for health studies.

**Here are some facts (underlined) that have been added to our previously submitted February 5, and February 16, 2025 submission.**

- The landfill operators of this Class III landfill plan to take approximately 384,000 tons of this potentially hazardous material by having it dumped high up on an exposed south facing slope over 120 days. Remember this is fire-related potentially hazardous debris that they will have to keep wet with their 2 water trucks when it is exposed to the open air after moving, grading and compacting in order to prevent it from drying out and becoming airborne until it is finally covered at the end of each day. Also, the US Army Corp of Engineers will be using 10-ton trucks resulting in an additional 69,600 trip ends based on 2,900 tons per day which will further degrade our air quality and impact our local traffic further risking the health, safety and welfare of the communities of Granada Hills and Sylmar (a minority community).
- Those 69,900 trip ends will have additional impacts to our air quality since they can potentially create stacking, congestion and delay to other trucks bringing MSW at the entrance before the two waste streams split or as they exit to San Fernando Road which residents currently report is a total mess. There has not been a Traffic Study performed to support the 15,000 tons per day contemplated. The only studies ever done did not address “cumulative impacts” from the 12,100 tons/day from a combined City/County landfill but addressed each as an individual entity, first the County 6,600 tons/day and then the City 5,500 tons/day.



- In realigning the entrance roadway and haul road, they have cut into the north face of the closed Cityside landfill which was supposed to be under final cover. However, this cover is not the originally required 15-feet but only a prescriptive final cover of approximately 5-feet because they made the landfill too steep to apply the standard final cover. In recently creating the roadway they unearthed trash buried there. I am not sure if they received the required grading approvals from County Public Works but that needs to be validated, however, we have since learned that they were cited by the SCL-LEA.

Sincerely,



Wayde Hunter

President, North Valley Coalition of Concerned Citizens Inc.

c.c.

Los Angeles County Board of Supervisors, Los Angeles City Council, County Public Works, County Public Health, County Regional Planning, SCAQMD, RWQCB USACE, SCL-LEA, SCL-TAC, SCL-CAC , GHNNC, GHSNC

Notes:

**Submitted electronically in OPPOSITION to Item 10 February 10, 2025, Agenda**

SHAME on you if you approve Sunshine Canyon Landfill. There is not a worse place in California that you could put this fire-related debris in from Phase 2. The landfill is a PUBLIC NUISANCE located in a WIND TUNNEL in which the landfill operators plan to dump the material high up on an exposed south facing slope approximately 384,000 tons in 120 days. Fire-related potentially hazardous waste that they will have to keep wet to prevent it from drying out and becoming airborne until it is covered at the end of the day. And don't you forget that the US Army Corp of Engineers will be using 10-ton trucks and resulting in 69,600 trip ends which will further degrade our air quality and impact our local traffic further risking the health, safety and welfare of the communities of Granada Hills and Sylmar.



**Agenda Board of Supervisors TUESDAY, February 25, 2025**

**10. Temporary Waiver of Wasteshed Restriction and Increase in Disposal Tonnage Limits at Local Landfills** Recommendation: Find that the temporary waiver of the wasteshed restrictions at the Calabasas Landfill to allow it to accept debris generated by the January 2025 Windstorm and Critical Fire Events, which is necessary to eliminate immediate threats to life, public health and safety, and improved property, and to ensure economic recovery of the affected communities to the benefit of the community-at-large; authorize the Calabasas Landfill to temporarily accept material from outside of the wasteshed to accommodate the emergency disposal of debris generated by the January 2025 Windstorm and Critical Fire Events, effective immediately and continuing for six months initially, with a possible extension options, as necessary, by the Director of Public Works, in concert with the Chief Engineer of the County Sanitation Districts, as part of disaster response and recovery efforts and when it is in the public interest to do so, provided that the excess tonnage amounts consist solely of debris resulting from the January 2025 Windstorm and Critical Fire Events; authorize the Sunshine Canyon and Lancaster Landfills to temporarily increase their tonnage limits effective immediately and continuing for 120 days initially, with an option of extension by the Board, upon joint recommendation from the Directors of Public Health and Public Works, as part of disaster response and recovery efforts and when it is in the public interest to do so, provided that the excess tonnage amounts consist solely of debris resulting from the January 2025 Windstorm and Critical Fire Events; and find that the proposed activities recommended herein are exempt from the California Environmental Quality Act. (Department of Public Works) APPROVE (Continued from the meeting of 2-18-25) (25-1112)

Attachments: Board Letter Public Comment/Correspondence

<https://file.lacounty.gov/SDSInter/bos/supdocs/200416.pdf>