LAW OFFICES OF

THOMAS M. BRUEN A PROFESSIONAL CORPORATION

TELEPHONE: (925) 295-3131 FACSIMILE: (925) 295-3132

A PROFESSIONAL CORPORATION 1990 NORTH CALIFORNIA BOULEVARD SUITE 608 WALNUT CREEK, CALIFORNIA 94596

WRITER'S DIRECT DIAL (925) 295-3135

THOMAS M. BRUEN ERIK A. REINERTSON

WRITER'S EMAIL

ereinertson@tbsglaw.com

June 30, 2016

By Express Mail

Los Angeles Sanitation Bureau Attn: Custodian of Records 1149 S Broadway Los Angeles, CA 90015

Re: Public Records Request

Dear Los Angeles Sanitation Bureau:

Our firm represents Browning-Ferris Industries of California, Inc., the owner and operator of the Sunshine Canyon Landfill. We are hereby requesting the following public records be produced to our firm for inspection and copying.

Pursuant to the California Public Records Act, Government Code section 6253(c), please notify us in writing within 10 days of today's date whether the Los Angeles Sanitation Bureau will disclose the requested public records. Please note this information is needed for an upcoming hearing before the SCAQMD Hearing Board, that may commence as early as July 30, 2016, relating to a proposed abatement order directed at the Sunshine Canyon Landfill.

We are requesting the following categories of public records that were created, generated, transmitted or communicated at any time during the period from July 1, 2015 and the date of your response to this request:

1. All COMMUNICATIONS (as used herein, "COMMUNICATIONS" means and includes all letters, correspondence, transmittals of documents, emails, email attachments, reports, memoranda, and all other forms of transmitting information from one person to another, and including whether the information is transmitted electronically, by mail, personal delivery or overnight delivery) transmitted between any employee of Los Angeles Sanitation Bureau and any employee of the South Coast Air Quality Management District relating or referring to the Sunshine Canyon Landfill.

¥

Los Angeles Sanitation Bureau June 30, 2016 Page 2

- 2. All RECORDS (as used herein, the term "RECORDS" means any "Writing" as that term is defined in California Evidence Code section 250 and/or any "Public Record" as defined in section 6252(e) of the California Government Code, and includes but is not limited to documents, memoranda, reports, studies, emails, email attachments, transmittals, letters, correspondence, agendas, notes or minutes of meetings and phone conversations, spreadsheets, worksheets, data compilations and lists) referring or relating to any proposal to reduce or limit the hours of operation of the Sunshine Canyon Landfill, including any proposal to reduce or limit the hours during which the Sunshine Canyon Landfill may receive waste.
- 3. All COMMUNICATIONS referring or relating to any proposal to reduce or limit the hours of operation of the Sunshine Canyon Landfill, including any proposal to reduce or limit the hours during which the Sunshine Canyon Landfill may receive waste.
- 4. All RECORDS referring or relating to any proposal to reduce or limit the amount or tonnage of waste that the Sunshine Canyon Landfill may receive each day (or other time period) for disposal.
- 5. All COMMUNICATIONS referring or relating to any proposal to reduce or limit the amount or tonnage of waste that the Sunshine Canyon Landfill may receive each day (or other time period) for disposal.
- 6. All RECORDS referring or relating to the proposed issuance by the South Coast Air Quality Management District of an order of abatement directed at the Sunshine Canyon Landfill.
- 7. All COMMUNICATIONS referring or relating to the proposed issuance by the South Coast Air Quality Management District of an order of abatement directed at the Sunshine Canyon Landfill.
- 8. Any plans of the Los Angeles Sanitation Bureau for rerouting waste collection or delivery vehicles to locations other than the Sunshine Canyon Landfill if the South Coast Air Quality Management District issued an order of abatement limiting the hours of operation of the Sunshine Canyon Landfill.
- 9. Any plans of the Los Angeles Sanitation Bureau for rerouting waste collection or delivery vehicles to locations other than the Sunshine Canyon Landfill if the South Coast Air Quality Management District issued an order of abatement limiting the amount or tonnage of waste that the Sunshine Canyon Landfill could receive daily (or during any other period of time).

Los Angeles Sanitation Bureau June 30, 2016 Page 3

Please direct all communications regarding this request to the undersigned. Thank you for your anticipated cooperation in this matter.

Sincerely,

Erik A. Reinertson